VEDRAI

PRIVACY POLICY FOR USERS ('POLICY')

Last updated: November 2026

1. Why we ask you to read this document

Because we want to be transparent about how we process your personal data ('Data' or 'Personal Data') and also because the following European and national laws require it:

- Regulation (EU) 2016/679 ('GDPR')
- Legislative Decree No. 196 of 30 June 2003 ('Privacy Law')
- Legislative Decree No. 101 of 10 August 2018.

We reserve the right to amend and/or update the Privacy Information whenever we are required to do so by any additions or amendments to the European and national regulations set out above or by changes in the types of processing or services offered. The new versions of the Privacy Information will replace the previous ones and will be valid, effective and applied from the date of its publication on the portal or from the date of communication to the parties concerned.

2. Who is the 'Controller' of the processing of your personal data and what it means

The data controller (the "Controller") is Vedrai S.p.A. with registered office in Milan, Piazza Vetra, 17 - 20123 (MI) ("Vedrai").

In a nutshell, it means that Vedrai decides 'why' and 'how' to process your data when using https://vedrai.com/it (hereinafter the 'Site') and when you receive the emails we send you.

3. Personal Data Protection Officer (DPO) and how you can contact us

Vedrai has appointed a Data Protection Officer (DPO).

If you have any questions about the Policy, or how your information is handled, you can write to us at: legal@vedrai.com.

We will explain more in the various sections, what information you can request and what privacy rights you can exercise, in section 10 of this policy.

4. What data we process

a) Data directly provided by you (User)

Personal Data is collected by filling in the online forms available in some sections of Our Site, by accessing the contact us area, by subscribing to the newsletter, by accessing other areas that may be available from time to time and/or by using the communication tools available on the Site. By filling in the Data collection forms on the Site, you may provide us with Personal Data (e.g. first name, last name, email address, VAT number, mobile phone number, and/or other personal data).

b) Data collected for the following services

- HubSpot CRM is a User database management service provided by HubSpot, Inc., which Vedrai also uses to send the emails described in letter d). Personal data processed: first name, last name, email address, VAT number, mobile phone number, email open and click data, and/or other personal data.
- Hotjar is a heat mapping and session recording service provided by Hotjar Ltd. Hotjar respects generic 'Do Not Track' headers. This means that the browser can instruct the script not to collect any user data. This is a setting that is available in all major browsers. Personal Data Processed: Usage Data; Tracking Tools; various types of Data as specified by the privacy policy of the service.
- Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited. Use of the reCAPTCHA system is subject to Google's privacy policy and terms of use. For an understanding of Google's use of data, please refer to Google's partner policy. Personal Data processed: clicks; Usage Data; keypress events; motion sensor events; touch events; mouse movements; scrolling position; answers to questions; Tracking Tools.
- Google Tag Manager is a tag management service provided by Google Ireland Limited. Personal Data Processed: Usage Data; Tracking Tool.
- Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc. Personal Data processed: various types of Data as specified by the privacy policy of the service.
- LinkedIn Conversion Tracking (LinkedIn Insight Tag) is a statistical and behavioural targeting service provided by LinkedIn Corporation that links data from the LinkedIn ad network with actions taken within this Website. The

LinkedIn Insight Tag tracks conversions that can be attributed to LinkedIn ads and allows targeting of groups of Users based on their previous use of this Website. Users can opt-out of behavioural advertising features through their device settings, their LinkedIn account settings or by visiting the AdChoices opt-out page. Personal Data Processed: Usage Data; Device Information; Tracking Tools.

- Meta ads conversion tracking (Meta pixel) is a statistics service provided by Meta Platforms Ireland Limited that links data from the Meta ad network with actions taken within this Website. The Meta pixel monitors conversions that can be attributed to Facebook, Instagram and Audience Network ads. Personal Data Processed: Usage Data; Tracking Tools.
- Hotjar Form Analysis and Conversion Funnels (Hotjar Ltd.) is a statistics service provided by Hotjar Ltd. Hotjar respects generic 'Do Not Track' headers. This means that the browser can instruct the script not to collect any user data. This is a setting that is available in all major browsers. More information on opting out of Hotjar is available here. Personal Data Processed: Usage Data; Tracking Tools.
- Google Analytics 4 is a statistics service provided by Google Ireland Limited ("Google"). Google uses the Personal Data collected in order to track and examine the use of this Website, compile reports and share them with other services developed by Google. Google may use Personal Data to contextualize and personalize ads in its advertising network. In Google Analytics 4, IP addresses are used at the time of collection and then deleted before the data is stored in any data center or server. To learn more, you can consult Google's official documentation. To learn about Google's use of Data, you can consult their partner policy and their Commercial Data page. Personal Data processed: Usage Data; number of Users; session statistics; Tracking Tools.

c) Collected navigation data and cookies

The device you use to connect to the Site has an identification code (the IP address) which, thanks to the logic of the Internet, is communicated to Vedrai and recorded. Thanks to other tracking and functional computer tools ("Cookies or other technologies"), Vedrai is also able to obtain other information on how you use the Site

(e.g.: time of access, content clicked and pages visited, length of stay on pages, preferences, route taken on the Site, etc.).

In some cases, we process Browsing Data, Cookies or other technologies and other data resulting from the application of computer procedures and technologies to technically enable you to use the Site and, in other cases, we process such Data to better understand how you use the Site and to perform statistical analysis - including by comparing it with the use made by other users - in order to improve the Site and customize the services offered.

If you would like to learn more about Browsing Data, Cookies or other technologies and methods of tracking, measurement and analysis, we suggest that you read the Cookie Policy, which explains in detail what Cookies or other technologies we use and how you can enable (or disable) them by giving us your consent (or revoking it).

d) Data collected through the emails we send you (tracking pixels and tracked links)

The newsletter and the promotional communications that Vedrai sends you through HubSpot may contain a tracking pixel, i.e. a very small image, usually invisible, hosted on a remote server and downloaded by your email program when you open the email, and links modified so as to record the click before taking you to the destination page. Through these tools Vedrai records, for each recipient, whether and when the email was opened and how many times, which links you clicked, the IP address, and the type of device and email program used; this information is associated with your contact record in HubSpot.

The tracking pixel works only if your email program downloads images: if you read emails in plain text, or if you have disabled the automatic download of images, the pixel is not loaded. The purposes for which we use this data, the legal basis and how to withdraw your consent to tracking alone are set out in section 5, letter b).

5. Why we use your Data (purpose and legal basis)

Your Personal Data collected as described in the section ‘What data we process’ is used for the following purposes:

a) to provide our Services and respond to your requests

Therefore, the Personal Data collected may be used to fulfill any contractual, pre-contractual and any other obligation arising from a legal provision. Legal basis: execution of contract, legal obligation.

b) for further purposes:

- to organize, access and modify your data (management of user databases). Legal basis: legitimate interest
- to send you the newsletter and promotional communications about Vedrai's products, services, events and webinars (mailing list management), also with the tracking pixels and tracked links described in section 4, letter d), in order to measure the effectiveness of campaigns and improve their content, subject lines and sending times. Legal basis: consent (Article 6(1)(a) GDPR and, for the tracking pixel, Article 122 of the Privacy Law). Consent to tracking is included in your consent to receive the communications, but you can withdraw your consent to tracking alone at any time from the preferences page reached through the "Manage preferences" link at the bottom of every email, by unticking the question "Can we track opens and clicks on future emails sent to this email address?": you will keep receiving the communications, without tracking. From the same page you can also unsubscribe from all communications;
- to convey advertising information that is most relevant to You based on Your browsing behavior, Your preferences and Your interactions with the emails we send you, including opens and clicks recorded through tracking pixels and tracked links (Commercial purposes and profiling). Legal basis: consent (Article 6(1)(a) GDPR and, for the tracking pixel, Article 122 of the Privacy Law);
- if you have purchased a Vedrai product or service, to send you, at the email address you gave us on that occasion, communications about similar products and services, even without your consent, as permitted by Article 130(4) of the Privacy Law. You can object at any time, free of charge, through the link in every email or by writing to legal@vedrai.com. These emails contain tracking pixels and tracked links only if you have consented to Commercial purposes and profiling. Legal basis: legitimate interest (Article 6(1)(f) GDPR);
- to analyze the characteristics of data traffic related to the Site (analysis purposes). Legal basis: legitimate interest

- to counter fraudulent use of e-mail and/or the Site by third parties (e-mail address verification purposes). Legal basis: legitimate interest
- to be contacted after filling in the form on the website and/or using other communication tools on the website. Legal basis: consent, legitimate interest

Please note that it is not compulsory to provide your data for any of the above purposes. Without it, however, we will not be able to fulfill one or more of these purposes. Failure to provide the "Data provided directly by You (User)" makes it impossible to provide the Services. If you refuse or withdraw your consent to email tracking, you will keep receiving the communications you have consented to, without any limitation.

c) Purpose and legal basis for use of specific services

User Database Management

These types of services allow Vedrai to build user profiles from an email address, name or any other information you provide to this Web Site, as well as track your activities through statistical features, including the email opens and clicks described in section 4, letter d). This Personal Data may also be cross-referenced with your publicly available information (such as social network profiles) and used to build private profiles that Vedrai may view and use to improve this Web Site. Some of these services may also allow for the scheduled sending of messages, such as emails based on specific actions you take on this Web Site. Legal basis: consent

Service: HubSpot CRM (HubSpot, Inc.)

Heat mapping and session recording

Heat mapping services are used to identify the areas of this Website that you interact with most frequently, in order to detect which areas attract the most interest. These services monitor and analyze traffic data and serve to track your behavior. Some of these services may record sessions and make them available for later viewing. Legal basis: consent

Service: Hotjar Heat Maps and Recordings (Hotjar Ltd.)

SPAM protection

This type of service analyzes the traffic of this Website, potentially containing your Personal Data, in order to filter it from parts of traffic, messages and content recognised as SPAM. Legal basis: legitimate interest in the security of the Site and its forms (Article 6(1)(f) GDPR)

Service: Google reCAPTCHA (Google Ireland Limited)

Tag Management

This type of services is functional for the centralized management of the tags or scripts used on this Website. The use of these services implies the flow of your Data through them and, if applicable, their retention. Legal basis: legitimate interest in the technical management of the Site; the tools activated through the service that require consent are loaded only after you have given it

Service: Google Tag Manager (Google Ireland Limited)

Hosting and backend infrastructure

These types of services have the function of hosting data and files that allow this Website to function, enable its distribution and provide a ready-to-use infrastructure to deliver specific functionalities of this Website. Some of the services listed below, if any, may operate on geographically dispersed servers, making it difficult to determine the actual location where Personal Data are stored. Legal basis: legitimate interest

Service: Amazon Web Services (AWS) (Amazon Web Services, Inc.)

Advertisement

Some of the services mentioned below may use tracking tools to identify you, or use the technique of behavioral retargeting, i.e. displaying advertisements tailored to your interests and behavior, or measuring the performance of advertisements. For more information on this, we suggest that you check the privacy policies of the respective services. Generally, services of this type offer the possibility to disable such tracking. In addition to any opt-out function provided by any of the services listed in this document, you can give or withdraw your consent to these tools through the Cookie Policy. Legal basis: consent

Services: LinkedIn Conversion Monitoring (LinkedIn Insight Tag) (LinkedIn Corporation); Meta ads conversion monitoring (Meta pixel) (Meta Platforms Ireland Limited); Hotjar Form Analysis and Conversion Funnels (Hotjar Ltd.)

Statistics

The services contained in this section allow Vedrai to monitor and analyze traffic data and serve to track your behavior. Legal basis: consent

Services: Google Analytics 4 (Google Ireland Limited)

In general: to enable or revoke consent to the tracking tools on the Site see the Cookie Policy; for email tracking use the “Manage preferences” link at the bottom of every email.

6. How we use your data

The processing of your Personal Data will be carried out by means of paper and computerized instruments, with organizational methods and logics strictly related to the purposes indicated in the section “Why we use your Data (purpose and legal basis)” above. If necessary, Vedrai may entrust a part of the processing of Personal Data to third parties, also by virtue of specific appointment of data processors by Vedrai itself. For example, your Personal Data may be processed by the hosting service provider for the operation of the Site as well as by other service providers for the maintenance of the Site and/or the provision of other services by Vedrai.

Your Personal Data collected will not be subject to any processing and/or automated decision-making process, including profiling, which may produce legal effects for You or which may significantly affect You.

7. With whom we share your data

We may share your data with the following categories of entities (“Recipients”):

- persons authorized by us: these are our employees and collaborators, including system administrators, who have signed a confidentiality agreement and specific rules for the processing of your Data.
- Your Data may be communicated and shared with external parties (persons, companies, public bodies and authorities), including but not limited to:

- service providers for the development and implementation of websites and web pages;
- e-mail service provider;
- hosting and cloud service providers;
- service providers and technology platforms (CRM, marketing, advertising);
- provider of the user behavioral analysis and profiling software platform;
- credit institutions and online payment intermediaries;
- consultants and professionals (e.g. lawyers, accountants and labour, tax and accounting consultants);
- insurance companies;
- public bodies and authorities.

In some cases, the entities listed act completely independently, so they will themselves be the data controllers of your Data (for example, public entities to which we disclose your Data in order to fulfill tax obligations).

In other cases, the listed entities act and process your data on our behalf and within the limits of the service contract or agreements in place with us and are specifically appointed as data processors in accordance with Article 28 GDPR. Upon request we can make available the list of data processors contracted by Vedrai.

You may at any time request more information on how your Personal Data is stored by sending an e-mail to: legal@vedrai.com

8. Where your data is stored

Your Personal Data will be stored at Vedrai's operational headquarters and at any other location of the parties involved, including any external data processors. Your Personal Data will also be stored in cloud computing on servers provided by Amazon Web Services (Amazon AWS) in accordance with the GDPR.

Some of the providers listed in section 4, letter b), are established in the United States (HubSpot, Inc., Amazon Web Services, Inc., LinkedIn Corporation) or belong to groups established in the United States (Google, Meta) and may process your Personal Data outside the European Economic Area. In that case the transfer is based on the European Commission's adequacy decision of 10 July 2023 on the EU-U.S. Data Privacy Framework (Article 45 GDPR), for the providers that participate in it, or, failing that, on

the standard contractual clauses adopted by the European Commission (Article 46 GDPR). You can obtain information on the safeguards in place by writing to legal@vedrai.com.

You may at any time request more information on how your Personal Data is stored by sending an e-mail to: legal@vedrai.com

9. How long we keep your data

Your Personal Data processed for the above purposes will be retained for as long as is strictly necessary to achieve those same purposes for which it was collected. Your Personal Data will be retained for the duration of Your use of the Site, for as long as is necessary to fulfill the additional purposes set forth in Section 5(b), for as long as is necessary to comply with applicable legal and regulatory obligations, and for purposes of Your own or third party defense.

Where the processing of your Personal Data is based on your consent, your Personal Data may be retained by Vedrai until you withdraw your consent (to enable or withdraw consent see the Cookie Policy and, for emails, the “Manage preferences” link). Your Personal Data may, however, be retained for a longer period if necessary to comply with a legal obligation or an authority order. All Your Personal Data will be deleted or stored in a form that does not allow identification of You (anonymization) within 30 days after the end of the retention period.

Email open and click data collected through tracking pixels and tracked links (section 4, letter d)) is retained until you withdraw your consent to tracking and, in any case, for no longer than 24 months from its collection. After withdrawal, it is no longer used to measure campaigns or for Commercial purposes and profiling.

For more information on storage criteria and periods, please write to legal@vedrai.com

10. How to Control Your Data and Exercise Your Rights

At any time you may request, also through a third party proxy, to:

- access to your data: we will provide you with the data we have on you;
- make your Data portable: where applicable, we will provide you with the Data we have on you in an interoperable, machine-readable format;

- rectify your data: for example, you can ask us to change the e-mail or telephone number you have provided if they are incorrect;
- limit the processing of your data: for example, if you believe that processing by us is unlawful and/or you believe that certain processing carried out on the basis of our legitimate interest is not appropriate;
- deletion of Your Data: in the cases provided for by applicable law;
- object to the processing of your Data: on grounds relating to your particular situation, where the processing is based on our legitimate interest, and at any time, without giving any reason, where your Data is processed for direct marketing purposes (Article 21 GDPR);
- update your preferences for consent-based processing of your data: for example, you can ask us not to send you promotional communications;
- withdraw your consent at any time, including for email tracking alone, without affecting the lawfulness of processing based on consent before its withdrawal (Article 7(3) GDPR): for email tracking you can use the “Manage preferences” link at the bottom of every email.

The response time under European law to which we are subject is 1 month from your request (extendable to a further 2 months in the case of particular complexities).

Requests shall be made in writing to Vedrai S.p.A. via:

- registered mail with return receipt: Vedrai S.p.A. with registered office in Milan, Piazza Vetra, 17 - 20123 (MI)
- e-mail: legal@vedrai.com

You may also contact our Data Protection Officer (DPO) at any time by writing to: legal@vedrai.com

11. What you can do if you are not satisfied with how we handle your Data

Despite our focus on data protection, it is still possible that you feel that your rights have been violated or that the way in which we process your data seems to you to be contrary to or inconsistent with the law. In these cases, if you wish, you can lodge a complaint or report to the national authority that monitors compliance with the law. In

Italy, this is the Italian Data Protection Authority (here is the link to its web portal: https://www.garanteprivacy.it/).

In any case, you can always contact us before turning to the authorities for clarification and to discuss your requests.