

**Leonardo - Società per azioni**

Ordinary Shareholders' Meeting 13 and 20 May 2020 (I and II call)

**Information policy pursuant to Articles 13 and 14 of (EU) Regulation 679/2016 as amended and supplemented (the "GDPR"), and the Italian and European laws that integrate it as amended and supplemented ("Privacy Applicable Law")**

Dear Shareholder,

pursuant to and for the purposes of the Privacy Applicable Law, Leonardo S.p.a. (hereinafter, in short, referred to as "Company"), as Data Controller, provides you the information on the processing of personal data you supplied to the Company, also through credit Institutions and companies of Financial Intermediation, in relation to your status as a Shareholder and your participation in the Shareholders' Meeting through the Designated Representative (the "**Information Policy**").

**1) Purpose and legal basis of the processing**

Your personal data will be processed exclusively for the following purposes:

- (i) for the purpose of managing relations with you as a Shareholder, including corporate and Shareholders' Meeting fulfillings and, in particular, for the following purposes: (1) updating of the Register of Shareholders and activities related to your status as a Shareholder; (2) updating the *mailing list* (name, address and any other contact details) in order to send corporate communications and documentation; (3) registration for the attendance, also by proxy, at the Shareholders' meetings and to other corporate events, registration and recording of votes, statistics for the check of the shareholding base of the Company or participation in the Shareholders' Meetings and other corporate events;
- (ii) fulfilling further obligations provided by law, regulations or EU legislation and, in any case, in relation to the obligations connected with your status as a Shareholder;
- (iii) enforcing or defending a right in court or in a preliminary phase to the judgment;
- (iv) for purposes related to extraordinary corporate transactions (i.e. mergers, sales of business units, etc.), based on the legitimate interest of the Data Controller.

Your personal data will be processed without the need for prior consent, as the aforementioned processing takes place only for the purposes listed above, in accordance with and in compliance with the guarantees provided by the Privacy Applicable Law.

## **2) Processing methods and data retention period**

The processing is carried out manually (for example, on paper) and/or through the use of automated tools (for example, using electronic procedures and supports and, in some cases, even tools for recording events) and, in any case, in compliance with the Privacy Applicable Law, with the implementation of adequate technical and organizational measures in accordance with the provisions of Article 32 of the GDPR. The processing is carried out by specially trained and authorized parties, in compliance with the provisions of Article 29 of the GDPR. In any case, its logical and physical security and confidentiality will be guaranteed.

The processing of personal data will be carried out according to the principles of proportionality and necessity, so that unnecessary personal data are not collected or processed. The processing of personal data will be fair and transparent and therefore adequate information will always be given to the Data Subject about the processing carried out, and in compliance with the requirement of adequacy of security measures.

In compliance with the principles of lawfulness, limitation of purposes and minimization of data, pursuant to Article 5 of the GDPR, your data will be kept for the entire duration of your status as a Shareholder and for the time strictly necessary for the fulfilment of the related obligations and, in any case, according to the prescribed terms provided for the exercise of the rights deriving from the company relationship.

## **3) Data Controller, Processors and categories of the Persons in charge of Leonardo S.p.a.**

The Data Controller of your personal data is Leonardo S.p.a., with its registered office in P.zza Monte Grappa 4 - 00195 Roma, email: [leonardo@pec.leonardocompany.com](mailto:leonardo@pec.leonardocompany.com) (“Data Controller”).

The Data Controller has provided to designate more Data Processors. The list of names of the Data Processors, pursuant to Article 28 of the GDPR, is available to the Data Subjects, upon request to be sent by email to the address of the DPO shown below.

The Data Controller has appointed a Data Protection Officer (DPO), as required by the GDPR, with tasks of surveillance, supervision and specialist consultancy in the area of privacy that can be contacted for any support at the following email address: [DPO.leonardo@leonardocompany.com](mailto:DPO.leonardo@leonardocompany.com).

## **4) Categories of third parties to whom the data could be disclosed**

Your data will be publicly disclosed, to the extent necessary and in compliance with the laws in force and with CONSOB regulations, as well as in cases where communication or disclosure is required, in accordance with the law, by Police forces, by the judicial authority, by information and security bodies or other public entities for purposes of defence or state security or prevention of the detection or repression of crimes.

While carrying out its activity and for the pursuit of the processing purposes indicated above, the Data Controller could disclose the data to:

- public administration bodies in compliance with legal obligations;
- the judicial authority;
- companies entrusted with managing the Shareholders' Register of Leonardo S.p.a.;
- companies acting as Shareholders' Representative designated by the Company pursuant to Article 135-undecies of Legislative Decree No. 58/98 (TUF - Consolidated Law on Finance), to collect voting proxies/sub-delegation relating to the Shareholders' Meeting. Limited to this purpose and in

compliance with the obligations inherent in the representation in the Shareholders' Meeting and the expression of the vote of the person represented in compliance with the instructions given by the same, the Designated Representative acts as an independent data controller;

- companies involved in the management and maintenance of information systems, auditing firms, professional offices or freelancers for the performance of consultancy and assistance in corporate operations.

Your data could be disclosed to subsidiaries and related companies of the Data Controller for administrative purposes.

These parties will, as a rule, act as autonomous holders of the respective processing operations, except in the event that they act on behalf of the Data Controller in their capacity as Data Processors and have, therefore, entered into a specific contract that punctually governs the processing assigned to them, pursuant to Article 28 of the GDPR.

In this context and for the purposes described above, the data could also be transferred to countries outside the EU, in which case, the Data Controller undertakes to ensure that the recipient complies with the same standards established by the European Union legislation, by signing the clauses that shall be prepared by the European Commission or by the competent supervisory authority pursuant to Article 46, paragraph 2, sub paragraph c) and d) of the GDPR.

### **5) Rights of the Data Subjects**

Pursuant to Articles 15 to 22 of the GDPR, you have the right to obtain, from the Data Controller, confirmation that it is or is not processing your personal data and, in this case, to obtain access to your data. You are also entitled to:

- a) ask the Data Controller to confirm the existence of your personal data, the origin of such data, the logic and purpose of their processing, the categories of subjects to whom the data may be disclosed, as well as the identification details of the Data Controller and of its Processors;
- b) know, when possible, the expected data retention period or, if this is not possible, the criteria used to determine this period;
- c) request access to personal data, transformation into anonymous form, blocking, rectification, updating, integration, deleting of such data or limitation of their processing;
- d) opposing to the processing of personal data, for any reason related to your particular situation, within the limits established by the Privacy Applicable Law and, in particular, to oppose, at any time, to the sending of communications and/or information material by the Data Controller (right to opt-out) pursuant to Article 17 of the GDPR, through the "Cancel" function contained in the lower part of each electronic communication received by the Data Controller or by sending an explicit request to the email address [DPO.leonardo@leonardocompany.com](mailto:DPO.leonardo@leonardocompany.com);
- e) in the cases and with the limits established by the GDPR and by the Privacy Law, obtain the portability of the data, that is to receive them from the Data Controller, in a structured format, commonly used and readable by an automatic device, and to send it to another holder of the processing without impediments;

- f) made aware of the existence of an automated decision-making process, including profiling pursuant to Article 22, paragraphs 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of this processing for the Data Subject;
- g) withdraw consent at any time (where this is the legal basis of the processing), without compromising the lawfulness of the processing based on the consent given before the revocation;
- h) submit a complaint to the Authority for the Protection of personal data, following the procedures and instructions published on its official website ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

Any change or cancellation or limitation to the processing carried out at your request - unless this is impossible or involves a disproportionate effort - will be communicated by the Data Controller to each of the recipients to whom the personal data were communicated. The Data Controller may communicate such recipients to the Data Subject upon request.

For the purposes of exercising the aforementioned rights, as well as for any clarifications, you can directly contact the Data Controller by sending an email to the contact details of the DPO: [DPO.leonardo@leonardocompany.com](mailto:DPO.leonardo@leonardocompany.com).