



PRIVACY POLICY

DHH S.p.a, with its registered offices in Italy, 20153 Milano, Via Caldera 21 - Tax Code and VAT n° 09150720960 (hereinafter “DHH”) it’s an Italian stock company listed at the Euronext Growth Milan of Borsa Italiana Stock Exchange.

This Privacy Policy, in compliance with the Regulation (EU) 2016/679 (General Data Protection Regulation – “GDPR”) and the Italian Legislative Decree 2003/196 as modified by the Italian Legislative Decree 2018/101 (Privacy Code), describes the process of the personal data made by DHH through the website www.dhh.international

This Privacy Policy may be amended from time to time, so please check it regularly to keep yourself informed on updates.

In this page, you will find the following information:

1. WHAT KIND OF PERSONAL DATA RELATED TO ME DOES DHH PROCESS AS DATA PROCESSOR?
2. FOR WHAT PURPOSE AND ON WHAT LEGAL BASES AND HOW LONG DOES DHH USE AND COLLECT MY PERSONAL DATA?
3. WITH WHO DHH SHARES MY PERSONAL DATA?
4. ARE MY PERSONAL DATA TRANSFERRED OUTSIDE THE ECONOMIC EUROPEAN SPACE (SEE)?
5. ARE MY PERSONAL DATA SECURE, AND WHERE THEY WILL BE STORED?
6. YOUR RIGHTS AS A DATA SUBJECT
7. CONTACT DETAILS

1. WHAT KIND OF PERSONAL DATA RELATED TO ME DOES DHH PROCESS AS DATA PROCESSOR?

DHH website

We collect information about how you browse on our website, including the information that your browser or your device sends to our server when you visit the website. To collect this information, DHH may use cookies and similar technologies. You can find more information about cookies in our [Cookie policy](#).

DHH contact

When you use the form on the website to contact DHH, we collect some information about you, such as name, email address, subject and the information you freely insert in the message text. Such information is processed only to reply to your kind request. Such field is completely free, you may use it to disclose voluntarily more sensitive categories of Personal Data, such as data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership.

We kindly invite you to refrain from such disclosure unless you consider this to be strictly necessary. Please mind that sensitive categories of Personal Data can be processed with your explicit consent only, in compliance with the GDPR, therefore, you must express your explicit consent to process this kind of personal data, where you decide to share them, otherwise we will immediately delete them.



DHH newsletter

On our website you have the chance to sign you up for the newsletter in order to receive updates about our activities and corporate periodical information. In order to send you the e-mail we need only your e-mail address. Such information will be shared with our provider for sending the e-mail through its digital platform.

2. FOR WHAT PURPOSE AND ON WHAT LEGAL BASES AND HOW LONG DOES DHH USE AND COLLECT MY PERSONAL DATA?

In most cases, DHH will use your personal data on the following legal basis:

Consent: to send you marketing communication (newsletter) via electronic means, such as e-mail.

Performance of a contract or corporate duty: when processing is necessary to perform a service requested by you, such as replying to the contact form, and in general to execute a contract in which you are part or in order to take steps at your request prior to entering into a contract.

Legal obligation: when processing is necessary for compliance with a legal obligation to which DHH is subject, such as a tax or other regulatory obligations and requirements.

Legitimate interest: the processing takes place when DHH sends to you, by e-mail, the corporate notices (which can include, for example, Shareholders meetings minutes, reports, procedure, financial statements, corporate initiatives) published by the Investor Relation on the website to peoples/entities which are involved in the company statutory organization (i.e shareholders, corporate entities members, EGA, Tax consultants and audit members). Such legitimate interest has been valued by DHH through a balancing test, available on request.

We only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, DHH takes into account the volume and nature of the personal data, the potential risk due to unauthorised use or disclosure of your personal data, the purposes for which DHH processes your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

The table below includes a general overview of relevant purposes for which DHH processes your data in the context of various activities, the relevant legal basis and the retention period.



Purpose/Activity	Data Category	Legal basis	Retention period
Corporate communications (not marketing related) To manage our relationship with you which can include your role as Shareholder, Investor, BoD and Supervisor member, Euronext Growth Advisor (EGA), employee and collaborator of one of DHH group companies.	(1) Identity data (2) Contact data (3) e-mail address	(1) Performance of a contract/corporate duty (2) Legal obligation (3) Legitimate interest	(1) 10 years from the end of the contract/corporate role (2) the end of the legal obligation (3) the end of the legitimate interest
Marketing communications (newsletter) To send you our corporate communications and/or marketing communications	(2) e-mail address	(1) consent	24 months
Contact To reply to your contact form request	(1) Identity data (2) Contact data	(1) Performance of a contract (corporate duty)	1 year from the last contact request received

3. WITH WHO DHH SHARES MY PERSONAL DATA?

DHH works with different corporate entities and commercial partners that support our business, part of which are of the same company group. These companies supply us with some services such as issuing of receipt for the hosting services, newsletter provider.

Sometimes these companies have access to some of your personal data in order to supply their services or for dealing with their corporate and regulatory duties. They are not allowed to use your personal data for their own purpose, and they are nominated as data controller or data processor, in the latter case by a specific agreement for the process of your personal data.

4. ARE MY PERSONAL DATA TRANSFERRED OUTSIDE THE ECONOMIC EUROPEAN SPACE (SEE)?

DHH does not transfer your personal data outside the European Economic Area (EEA).

Whenever DHH transfers your personal data outside of EEA, DHH will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:



- a. we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see: European Commission: Adequacy of the protection of personal data in non-EU countries.
- b. where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see: European Commission: Model contracts for the transfer of personal data to third countries.
- c. where we use providers based in the US, we may transfer data to them if they are certified with the (USA) Data Framework Act which requires them to provide similar protection to personal data shared between the Europe and the US.

5. ARE MY PERSONAL DATA SECURE, AND WHERE THEY WILL BE STORED?

We understand that the security of your personal data is important. We provide reasonable administrative, technical, and physical security controls to protect your personal information. All information you provide us is stored on secure servers managed by providers of our company group. Unfortunately, the transmission of information via internet is not completely secure. Although we will do our best to protect your personal data, we cannot warrant or guarantee the security of your data transmitted to us; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. In case you would like to have more information on the specific security measures taken in order to save your data then please contact us.

DHH puts in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on DHH's instructions, and they are subject to a duty of confidentiality.

Finally, we have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. YOUR RIGHTS AS A DATA SUBJECT

YOUR RIGHT TO ACCESS

You have the right to access your personal data, including requesting information on whether DHH processes your data, which data are processed, and you may also request a copy of the data that you or a third person provided to DHH and which data is being processed by DHH.

If you request that DHH confirms whether or not DHH processes your personal data, then you have the right that obliges DHH to confirm that it processes your personal data or does not process your personal data.

YOUR RIGHT TO RECTIFICATION

You have the right to the correction of your personal data without undue delay. This enables you to ask that any incomplete or inaccurate data we hold about you to be corrected.



YOUR RIGHT TO ERASURE (or “right to be forgotten”)

Subject to certain conditions and in certain cases, you have the right to the erasure of your personal data. This means that you may request that we delete your personal data that we may have processed unlawfully or where the use of your data is no longer needed for a purpose. Please keep in mind that DHH may not be able to meet your request for specific legal reasons that will be referred to you, if applicable.

YOUR RIGHT TO THE RESTRICTION OF PROCESSING

You may also request the restriction of the processing of your personal data. For instance, you may request that we suspend the processing of your personal data where our use of the data is unlawful, but you do not want us to delete it.

YOUR RIGHT TO DATA PORTABILITY

Where the processing of your data is either based on your consent or is necessary for the performance of a contract, and the processing is carried out by automated means, then you may request the provision of your personal data that you have provided to us in a standard format, and you may also request such data be transferred to another entity.

YOUR RIGHT TO OBJECT

Importantly, when we process your data on the basis of our legitimate interests, you may object to such processing and request any of those activities be stopped.

YOUR RIGHT TO WITHDRAW CONSENT

Also, you have the right to withdraw your consent at any time where we rely on your consent for processing your data. You may do this at any time by contacting us at privacy@dhh.international. Remember that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal and that in some cases we may need time to process the request.

YOUR RIGHT TO LODGE A COMPLAINT

Without prejudice to any other administrative or judicial remedy that you may have (such as the right to claim compensation for damages suffered as a result of DHH’s breach of the GDPR), you have the right to lodge a complaint with the Italian Data Protection Authority, supervisory authority, or another data protection supervisory authority in the Member State of your habitual residence, place of work or place of the alleged infringement if you find that the processing of personal data relating to you infringes the GDPR.

The contact details are as follows:

Italian Data Protection Authority

Piazza Venezia 11 – 00187 Roma

Phone: +39-06-696771

e-mail: urp@gdpd.it



In any case, DHH would highly appreciate the chance to deal with your concerns before you approach the regulatory authority above, so please contact us in the first instance if you have any problems.

RESTRICTION ON THE ABOVE RIGHTS

Please be advised that, based on GDPR, Member States are allowed to restrict by way of a legislative measure the scope of the rights you may have as per the above. In case such a restriction is applicable in your respect, DHH will advise you accordingly when you contact us to exercise any of your above rights.

7. CONTACT DETAILS

In order to exercise the above-mentioned rights, please contact us. To this purpose please use the following contact details:

DHH S.p.a.

Via Caldera 21, Milano (MI) Italy

Phone: +39 02 87 365 100

e-mail: privacy@dhh.international

DATA PROTECTION OFFICER'S CONTACT

Our Data Protection Officer (DPO) is Mrs. Valentina Apruzzi, you can contact her by email at dpo@dhh.international

VERIFICATION OF YOUR IDENTITY

DHH may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. DHH may also contact you to ask you for further information in relation to your request to speed up our response.

WHO CAN I CONTACT IF I HAVE ANY DOUBT?

If you have any questions or complaints related to Privacy matters, please write an e-mail to our DPO at dpo@dhh.international.

Milano, 13/05/2024

DHH S.p.a.