

ATALANTA BERGAMASCA CALCIO S.R.L. INVESTOR PORTAL PRIVACY POLICY

This Privacy Policy was last updated on December 12th 2022

OUR COMMITMENT TO PRIVACY

Your privacy is important to Atalanta Bergamasca Calcio S.r.l. and our affiliates or group companies, meaning controlling, controlled or under common control companies (together, 'our', 'us', 'we', 'company' or 'Atalanta').

This Privacy Policy describes how we gather and use personal data of individuals who access the investor section of the Atalanta website available at investorrelations.atalanta.it ('**Investor Portal**'). Personal data is any information that can be used to identify you as an individual.

Please read this Privacy Policy carefully. This Privacy Policy does not apply to any processing of personal data by or on behalf of Atalanta that is covered by a more specific privacy notice. For the purposes of applicable data protection legislation, Atalanta and each of Atalanta's group companies (as applicable) will each be an independent data controller of any personal data collected by us. If you have any questions regarding our use of your personal data, or this Privacy Policy, please contact privacy.atalanta@percassi.com.

We rely on various legal bases under applicable data protection legislation in order to process your personal data according to section "*Why we use your personal data*" below. We use the personal data we collect to operate our business and provide you with the services (including investor services) and products we offer and perform essential or legitimate business operations.

If we require your personal data due to a legal requirement or obligation or in order to perform a contract with you, we will make you aware of this at the time we collect your personal data, and the possible consequences of you failing to provide this personal data. For example, we may require your passport details to verify your identity for the purposes of anti-money laundering regulations, and failure to provide this information means that we cannot provide our services or products to you. In this case, we may have to cancel an existing service or investment you have with us but we will notify you if this is the case at the time.

You do not need to take any action as a result of this Privacy Policy, but you do have certain rights as described below in the section headed "*Your rights*".

HOW WE OBTAIN YOUR PERSONAL DATA

Personal data you provide to us

We collect your personal data when you decide to interact with us, including when you provide us with personal data via the Investor Portal. The personal data we collect about you may include, but is not limited to, your name, name of your employer, email address, postal address, title, telephone number, passport or other government-issued identification and financial information. We only collect the personal data necessary to carry out our business for the purposes set out in the next section headed "*Why we use your personal data*".

We may also collect personal data (such as navigation data, IP addresses, domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier) notation addresses of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment) through

automated technology, such as cookies or other online identifiers. Please see the section headed “*Cookies*” below for information about how we use such technologies.

Personal data provided by third parties or publicly available sources

We also process personal data in relation to companies that we are evaluating in connection with a potential investment in or purchase of such companies. This personal data is obtained via third parties (i.e., the company in question). Personal data is also obtained from placement agents that we engage to market our applicable services.

We may, in certain circumstances, combine personal data that we receive from a potential investor with personal data that we collect from, or about such potential investor. This will include personal data collected in an online or offline context.

WHY WE PROCESS YOUR PERSONAL DATA

To the extent that you provide us with, or we otherwise collect, any personal data, including through or in connection with the Investor Portal, we may process such personal data for the below purposes. Note that we may process your personal data on more than one legal basis depending on the specific purpose.

Purpose	Legal Basis	Duration
To provide you with the services or products you have requested.	Performance of a contract of which you are a party	Contractual term and, after termination, for the ordinary limitation period of 10 years.
To register you as a potential investor and in order to provide access to the Investor Portal.		
To verify your status as an existing or legitimate potential investor in order to provide access to the Investor Portal.		
To keep a record of your relationship with us.		
To conduct due diligence activities in connection with an actual or prospective corporate transaction or investment with respect to which we are party to.		
Fraud and abuse prevention, including to protect against, identify and prevent money-laundering, cyber-attacks and other unlawful activity.	Legal obligation and/or legitimate interest (legal protection).	For the time indicated by the applicable laws. In the case of legal action, for the entire duration of the legal action, until the exhaustion of the time limits for appeal actions
Litigation management and conducting internal audits and investigations.		
To obtain advice from our professional advisors, including lawyers and accountants.		
To administer and protect our business and the Investor Portal.		
To respond to your contact requests via email, post or telephone.		

	provide the services and products securely).	
To send you information communications.	Consent (optional and revocable at any time)	Personal data and contact details: until consent is revoked Purchase detail data: 7 years after collection of each piece of data

No solely automated decision making, including profiling, is used when processing your personal data.

We may monitor communications where the law requires us to do so. We may also monitor communications, where required to do so, to comply with regulatory rules and practices and, where permitted to do so, to protect our business and the security of the Investor Portal and our systems.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

DISCLOSURE AND TRANSFER OF PERSONAL DATA

Although we do our best to protect your personal data, we cannot guarantee the security of any information or personal data transmitted to or through the Investor Portal; any transmission of information or personal data by you to or through the Investor Portal is at your sole risk.

Your personal data will be shared with and processed by us, including our affiliates and certain service providers as necessary to fulfil the purposes set out in this Privacy Policy, including consultants, agents, contractors, professional advisors, lenders and data hosting providers and in some instances, placements agents and other fund administrators, and persons employed and/or retained by any of the foregoing. We make sure anyone who provides a service to, or for us, enters into an agreement with us and meets our standards for data security. We may also share your personal data with regulatory authorities, as well as with tax authorities, auditors and tax advisers (where necessary or required by law).

To the extent your personal data is transferred to a Non-Equivalent Country, such transfers will only be made in accordance with applicable data protection legislation. Such transfers may be based on the adequacy decision or Standard Contractual Clauses approved by the European Commission. For further information about such transfers, please contact privacy.atalanta@percassi.com. For the purposes of this Privacy Policy, "Non-Equivalent Country" shall mean a country or territory other than (i) a member state of the European Economic Area; (ii) the United Kingdom; or (iii) a country or territory which has at the relevant time been decided by the European Commission or the Government of the United Kingdom (as applicable) in accordance with applicable data protection legislation to ensure an adequate level of protection for personal data.

We reserve the right to disclose your personal data as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator, national security, for the purposes of public importance or any other legal or investigatory process involving us. Should we, including any of our

affiliates, be the subject of a takeover, divestment or acquisition we may disclose your personal data to the new owner of the relevant business and their advisors.

SECURITY AND RETENTION OF PERSONAL DATA

We are committed to protecting the personal data you entrust to us. We adopt robust and appropriate technologies and policies, so the personal data we have about you is protected to the extent possible from unauthorized access and improper use. 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 our instructions and they are subject to a duty of confidentiality.

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.

We will keep your personal data only for as long as is reasonably necessary for the purposes set out in this Privacy Policy, and in any case within the durations indicated in the section headed "*Why we use your personal data*", unless a longer retention period is required by law. We will not keep more personal data than we need for those purposes. For further information, please contact privacy.atalanta@percassi.com].

MARKETING COMMUNICATIONS

We will only send you marketing newsletters, updates, alerts and similar marketing or promotional communications where you have requested information from us relating to our business or services which you might be interested in. If you receive a marketing communication from us by email, you may also opt out of receiving future email marketing communications by following the opt-out instructions provided in that email. Please see the section headed *Your rights* below.

CHILDREN'S PRIVACY

The Investor Portal is only intended for individuals who are at least 13 years of age. We do not knowingly encourage or solicit visitors to the Investor Portal who are under the age of 13 or knowingly collect personal data from anyone under the age of 13 without parental consent. If we learn we have collected or received personal data from an individual under the age of 13, we will take steps to delete that information.

COOKIES

Information regarding how you access the Investor Portal (e.g., browser type, access times, and Internet Protocol (IP) address) and about your hardware and software is automatically collected through the use of cookies (a small text file placed on your hard drive) or other technologies or tools. This information is used to improve the site performance of our Investor Portal and for our business purposes. Where cookies are not necessary for us to provide the products or services you have requested or for the functioning of the Investor Portal, we will ask you to consent to their use. You may also opt-out of cookies by changing the settings on your browser. If you opt-out of certain cookies, you may not be able to access certain parts of the Investor Portal.

On the Investor Portal we use the cookies listed below.

Name	Type	Purpose (EN)	Expiry
TS#	Necessary	This cookie only collects a session ID to ensure an equal distribution of all requests via our server. Valid until the end of the browser session.	Session
IRPages2_Session	Necessary	This cookie is used to identify a session instance for the user.	Session
cgi-bin/fncls.ssp	Statistic	This is not a cookie, but it will load a pixel image to count the requests/number of visits on the 'Financial News' webpage of the Investor Portal; this does not process personal data or online identifiers. If you open the news body it will load from cockpit domain.	Session
wordpress_	Necessary	This cookie is used to identify a session instance for the user.	1 day
XSRF-TOKEN	Necessary	This cookie ensures user browsing-security by preventing cross-site request forgery. This cookie is essential for the security of the user and the Investor Portal.	1 day
Cookie Consent	cookieconsent_status	This cookie remembers whether a user has accepted the cookie disclaimer at the point of first access to / first loading the Investor Portal.	7 days.

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. A website cannot function properly without these cookies.

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

You may wish to visit www.aboutcookies.org, which contains comprehensive information about types of cookies, how they are used, and how you manage your cookie preferences.

YOUR RIGHTS

You have the right to reasonable access to the personal data that we hold about you, and there are a number of ways you can control the way in which and what personal data we store and process about you. To exercise these rights and controls, please contact privacy.atalanta@percassi.com.

- **Access:** You have the right to ask for a copy of the personal data that we hold about you free of charge, however we may charge a 'reasonable fee', if we think that your request is excessive, to help us cover the costs of locating the personal data you have requested. Additionally, in accordance with applicable data protection legislation, we may limit or deny access to your personal data where the burden or expense of providing access would be disproportionate to the risks to your privacy, or where the legitimate rights of persons other than you would be violated. We reserve the right to take reasonable steps to authenticate the identity of any individual seeking access to personal data.
- **Correction:** We take reasonable steps to make sure that the personal data that we collect, use, and disclose is accurate, complete, and up-to-date, but you may notify us of changes to your personal data if it is inaccurate or it needs to be updated. We may provide web

pages or other mechanisms on the Investor Portal through which you can correct or update your personal data.

- **Deletion**: If you think that we should not be holding or processing your personal data any more, you may request that we delete it. Please note that this may not always be possible due to legal obligations.
- **Restrictions on use**: You may request that we stop processing your personal data (other than storing it), if: (i) you contest the accuracy of it (until the accuracy is verified); (ii) you believe the processing is against the law; (iii) you believe that we no longer need your personal data for the purposes for which it was collected, but you still need your personal data to establish or defend a legal claim; or (iv) you object to the processing and we are verifying whether our legitimate grounds to process your personal data override your own rights.
- **Object**: You have the right to object to processing, including: (i) for direct marketing; (ii) for research or statistical purposes; or (iii) where processing is based on legitimate interests.

If you receive a marketing communication from us by email, you may opt-out of receiving future email marketing communications by following the opt-out instructions provided in that email. We may also provide web pages or other mechanisms on the Investor Portal through which you can elect to change your preferences regarding our future use or sharing of your personal data with third parties for marketing purposes. Please note that we reserve the right to send you certain communications relating to your use of the Investor Portal, or other business matters, to the extent permitted under applicable data protection legislation, and these communications may be unaffected if you choose to opt-out from marketing communications.

- **Portability**: If you wish to transfer your personal data to another organisation (and certain conditions are satisfied), you may ask us to do so, and we will send it directly if we have the technical means.
- **Withdrawal of consent**: If you previously gave us your consent to allow us to process your personal data for a particular purpose, but you no longer wish to consent to us doing so, you can contact us to let us know that you withdraw that consent.

We 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. We may also contact you to ask you for further information in relation to your request to speed up our response.

NOTIFICATION OF CHANGES

We reserve the right to amend this Privacy Policy from time to time. If we decide to change our Privacy Policy, we will post those changes so users of the Investor Portal are always aware of what personal data we collect, how we use it, and under what circumstances, if any, we disclose it. You should check this Privacy Policy periodically. If at any point we decide to collect personal data or use any collected personal data in a manner different from that stated at the time it was collected, we will notify applicable users of the Investor Portal. We will use personal data only in accordance with the Privacy Policy under which the personal data was collected.

CONTACT US

If you have any questions or concerns about this Privacy Policy, please contact privacy.atalanta@percassi.com.

COMPLAINTS

If you are not happy with any aspect of how we collect and use your personal data, we invite you to contact us and tell us at privacy.atalanta@percassi.com. If you're not satisfied with our response, you can make a complaint as follows, under:

1. the UK GDPR and/or Data Protection Act 2018, please contact the UK Information Commissioner's Office – <https://ico.org.uk/global/contact-us>,
2. the EU GDPR, please contact your local supervisory authority in the EU Member State of your habitual residence, place of work, or place of the infringement, concern or complaint.

Your right to lodge a complaint is without prejudice to any other administrative or judicial remedy.