

## Directa Plus plc

### Shareholder Privacy Notice

This privacy notice was last updated on 30<sup>th</sup> October 2022.

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#### 1. ABOUT THIS PRIVACY NOTICE

This privacy notice applies if you are a current or former shareholder of Directa Plus plc ("**Directa Plus**", "**we**", "**our**", and "**us**"). As an individual shareholder of Directa Plus, we collect and process personal data about you in relation to your shareholding or interest in the shares of Directa Plus (whether that interest is legal or beneficial). We also collect personal data about individual contacts at our corporate shareholders.

This privacy notice describes what personal data we collect from you, what we use it for and on what basis. It also sets out your rights in relation to the personal data and how to exercise your rights.

#### 2. WHO WE ARE

We are Directa Plus plc (company number 04679109), an AIM listed company with its registered office at 7th Floor, 50 Broadway, London, SW1H 0DB, United Kingdom. We are the data controller of the personal data we collect and process, as described in this privacy notice.

Our trading subsidiary is Directa Plus S.p.A, with its operations based in Italy and primary office address at ComoNEXt Science Park, Via Cavour 2, Lomazzo 22074, (CO) Italy.

#### 3. CONTACTING US

We are not required to appoint a formal data protection officer under data protection laws. However, we have appointed a Privacy Manager who you can contact about any queries you may have in relation to this privacy policy. Our Privacy Manager is Giorgio Bonfanti.

If you have any questions about our privacy notice or your information, or to exercise any of your rights as described in this privacy notice or under data protection laws, you can contact us:

By post:

Privacy Manager  
Directa Plus plc, 7th Floor, 50 Broadway, London, SW1H 0DB, United Kingdom

By email:

[\[info@directa-plus.com\]](mailto:info@directa-plus.com)

#### 4. INFORMATION WE COLLECT

The categories of personal data that we collect from our shareholders include the following:

- your name;
- your contact details, including home address, email addresses and telephone number(s);
- details of your shareholding with Directa Plus, including number of shares held, dividends paid, date entered / removed from the share register;
- your bank sort code and account number.

##### *Information collected from third parties*

We collect personal information about our shareholders from the following third party sources:

- **Share Registrar** from which we collect the following categories of data: contact details, number of Directa Plus' shares held.
- **Brokers/Joint broker** from which we collect the following categories of data: contact details, number of Directa Plus' shares held.
- Publicly accessible sources i.e. Companies House.

#### 5. HOW WE USE YOUR INFORMATION

The purpose for which we use and process your information (excluding sensitive personal data) and the legal basis on which we carry out each type of processing is explained below.

Purposes for which we will process the information	Legal Basis for the processing
To include you on our shareholder register, administer your shareholding and keep your records on the shareholder register up-to-date	For the performance of our contract(s) with you, as set out in the memorandum and articles of association of Directa Plus and/or in any share scheme or plan trust deed or rules  To comply with our legal and regulatory obligations
To facilitate the payment of dividends	For the performance of our contract(s) with you, as set out in the memorandum and articles of association of Directa Plus and/or in any share scheme or plan trust deed or rules
To respond to queries in connection with your shareholding	For the performance of our contract(s) with you, as set out in the memorandum and articles of association of Directa Plus and/or in any share scheme or plan trust deed or rules  To comply with our legal and regulatory obligations
For communicating with shareholders in relation to shareholder meetings, voting instructions and other corporate actions	For the performance of our contract(s) with you, as set out in the memorandum and articles of association of Directa Plus and/or in any share scheme or plan trust deed or rules

	To comply with our legal and regulatory obligations
To complete transactions that you instruct us to undertake	For the performance of our contract(s) with you, as set out in the memorandum and articles of association of Directa Plus and/or in any share scheme or plan trust deed or rules
To comply with our legal and regulatory obligations and disclosure requirements to which Directa Plus is subject, as an AIM listed company	To comply with our legal and regulatory obligations
To enforce or defend our legal rights, including by bringing or defending claims made by or against Directa Plus in relation to your shareholding	It is in our legitimate interests to enforce or defend our rights. We consider this use to be necessary for our legitimate interests and proportionate.

Where we rely on legitimate interests as a lawful basis, we will carry out a balancing test to ensure that your interests, rights and freedoms do not override our legitimate interests. If you want further information on the balancing test we have carried out, you can request this from our Privacy Manager.

## 6. WHO WE SHARE YOUR PERSONAL DATA WITH

We do not share your personal data with third parties except as provided in this privacy notice.

We share your information with the following third parties:

- with our subsidiaries and affiliates;
- with our third party service providers, who perform services on our behalf including registrars who assist us with the maintenance of our share registers;
- with our professional advisors, such as auditors, lawyers, or other consultants;
- with Companies House.

Our third party service providers and professional advisors are subject to security and confidentiality obligations and are only permitted to process your personal data for specified purposes and in accordance with our instructions.

In addition, Directa Plus may disclose information about you in the following circumstances:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if all or substantially all of Directa Plus's assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation;
- to enforce or apply our terms and conditions or to establish, exercise or defend the rights of Directa Plus and its affiliates.

## 7. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the UK or the European Economic Area (EEA).

## 8. SECURITY OF YOUR PERSONAL DATA

We use industry standard physical and procedural security measures to protect information from the point of collection to the point of destruction. This includes encryption, firewalls, access controls, policies and other procedures to protect information from unauthorised access.

Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal data.

## 9. HOW LONG WE KEEP YOUR PERSONAL DATA

Your personal data will not be kept for longer than is necessary for the purposes for which it was collected and processed.

We will keep your personal data for as long as you hold shares or an interest in shares in Directa Plus and for a period of up to 5 years after you cease to hold shares or an interest in Directa Plus for the reasons noted below:

- to deal with outstanding matters relating to your shareholding, including where legal claims have arisen;
- to comply with our legal and regulatory requirements;
- to demonstrate that your instructions have been carried out properly.

## YOUR RIGHTS

### 10. ACCESS TO AND UPDATING YOUR PERSONAL DATA

You have the right to access information which we hold about you. If you so request, we shall provide you with a copy of your personal data which we are processing (“**data subject access request**”). We may refuse to comply with a subject access request if the request is manifestly unfounded or excessive or repetitive in nature.

You may also have the right to receive personal data which you have provided to us in a structured and commonly used format so that it can be transferred to another data controller (“**data portability**”). The right to data portability only applies where your personal data is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.

We want to make sure that your personal data is accurate and up to date. You have the right to have inaccurate personal data rectified, or completed if it is incomplete. You can update your details or change your privacy preferences by contacting us as provided in “*Contacting us*” above. We may refuse to comply with a request for rectification if the request is manifestly unfounded or excessive or repetitive.

### 11. RIGHT TO OBJECT

#### *Direct marketing*

You have the right to object at any time to our processing of your personal data for direct marketing purposes.

#### *Where we process your information based on our legitimate interests*

You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal data unless we can demonstrate compelling

legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

## **12. YOUR OTHER RIGHTS**

You also have the following rights under data protection laws to request that we rectify your personal data which is inaccurate or incomplete.

In certain circumstances, you have the right to:

- request the erasure of your personal data erasure (“**right to be forgotten**”);
- restrict the processing of your personal data to processing in certain circumstances.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply. We may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims. We may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive or repetitive in nature.

## **13. EXERCISING YOUR RIGHTS**

You can exercise any of your rights as described in this privacy notice and under data protection laws by contacting us as provided in “Contacting us” above.

Save as described in this privacy notice or provided under data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

## **14. COMPLAINTS**

If you have any questions or complaints regarding our privacy notice or practices, please contact us as provided in “*Contacting Us*” above.

You have the right to make a complaint at any time with a supervisory authority, in particular in the EU (or EEA) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is ICO who can be contacted at <https://ico.org.uk> or telephone on 0303 123 1113.

## **15. CHANGES TO OUR PRIVACY NOTICE**

From time to time, we may change this privacy notice. The current version of this Policy will always be available from us in hard copy or on our website. We will post a prominent notice on our website to notify you of any significant changes to this Policy or update you by other appropriate means.