

ENG

Privacy Notice

Date: July 3, 2026

This privacy notice is provided pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “GDPR”) to data subjects whose personal data are processed in the context of the licensing relationship relating to the artificial intelligence model “ENGGPT”.

This document explains the purposes and means by which your personal data are processed, the categories of personal data processed, the rights of data subjects and how such rights may be exercised.

1. Data Controller and Data Protection Officer

Pursuant to Article 4 GDPR, the Data Controller of your personal data referred to in this privacy notice is Engineering Ingegneria Informatica S.p.A., with registered office at Piazzale dell'Agricoltura 24, 00144 Rome, Italy, VAT No. 05724831002 (“Data Controller” or “Engineering”).

The Data Controller has appointed a Data Protection Officer (“DPO”), who can be contacted at the following email address: dpo.privacy@eng.it.

2. Categories of personal data processed

The Data Controller will collect and process ordinary personal data relating directly to the client or to individuals within the client’s organization, such as the client’s collaborators, employees and/or contact persons. Where the personal data of the client’s collaborators, employees and/or contact persons are disclosed to the Data Controller by the client, the client undertakes to provide this privacy notice to the individuals whose personal data are disclosed.

The data collected and processed include identification and contact data relating to data subjects acting as contact persons in commercial relationships carried out in the performance of license agreements, to the extent that such data are necessary for the proper management of that relationship or are voluntarily provided by the data subject. Information relating to service usage levels may also be processed for reporting/billing purposes.

Engineering does not collect, process or store any personal data that may be contained in prompts submitted by users to the licensed model or in the related generated content. Such data remains under the client’s control and is managed independently by the client through the technological infrastructure used to make the service available.

3. Purposes of Processing and Legal Bases

The Data Controller will process your personal data for the performance of license agreements, for internal customer management purposes and for compliance with legal obligations applicable to the Data Controller.

In particular, your personal data will be processed:

- A. for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract [Article 6(1)(b) GDPR];
- B. in order to comply with legal obligations to which the Data Controller is subject [Article 6(1)(c) GDPR];
- C. in order to ascertain facts, perform data and network security checks and prevent and combat cybercrime, thus pursuing the legitimate interests of the Data Controller in maintaining the protection of its internal IT systems and implementing appropriate security measures, as well as in establishing, exercising or defending legal claims [Article 6(1)(f) GDPR];
- D. for the sending, via email, of commercial and/or promotional communications relating to products or services similar to those already purchased (so-called “soft spam”). You always have the right to object to the sending of such communications by contacting the addresses indicated in this privacy notice. The legal basis for soft-spam communications is the Data Controller’s legitimate interest in promoting products or services similar to those already purchased [Article 6(1)(f) GDPR].

The provision of your personal data for purposes A, B and C is mandatory. Failure to provide such data will prevent the Data Controller, as a whole or in part, from establishing the commercial relationship with you or your company.

4. Authorised Persons and Data Recipients

The Data Controller will share your personal data with its employees and collaborators who have been specifically designated and instructed in writing pursuant to Article 29 GDPR (“Authorised Persons”), who will process the data, under the authority of the Data Controller, exclusively for the performance of their respective duties.

Your personal data may also be shared with third parties appointed by the Data Controller as data processors pursuant to Article 28 GDPR or, where provided for under applicable law, acting as independent data controllers.

With regard to such categories of recipients, your personal data may be shared with:

- public bodies and authorities where disclosure is required in compliance with legal provisions or orders issued by competent authorities;
- other companies of the Engineering Group;
- natural or legal persons, associations or professional firms providing consultancy and assistance services to the Data Controller;
- business partners supporting the Data Controller in carrying out and managing the purposes described above;
- banks, credit institutions and insurance companies.

5. Transfers of Personal Data Outside the EU

For the purposes described above, some of your personal data may be shared with recipients located outside the European Union / European Economic Area.

In such circumstances, the Data Controller ensures that any transfer of personal data is carried out in compliance with Chapter V of the GDPR (“Transfers of Personal Data to Third Countries or International Organisations”), including on the basis of an adequacy decision adopted by the European Commission pursuant to Article 45 GDPR or, where no such decision exists, by implementing the appropriate

safeguards provided for under Article 46 GDPR, such as the Standard Contractual Clauses in their latest version adopted by the European Commission.

6. Data retention period

Your personal data will be retained using measures strictly related to their security and to the resilience of the systems used for their processing, for no longer than is necessary to achieve the purposes for which they were collected. In particular, the retention and processing of your personal data will be carried out in full compliance with the principles of data minimisation and storage limitation pursuant to Article 5 GDPR.

In addition, the Data Controller may retain your personal data for a longer period in order to comply with contractual and legal obligations applicable to it and, where necessary, to establish, exercise or defend legal claims in judicial and extrajudicial proceedings, in any event for no longer than the maximum period permitted by applicable law from time to time.

7. Rights of Data Subjects

Under applicable data protection legislation, you are entitled to the following rights.

- **Access:** the right to obtain access at any time to the personal data concerning you held by the Data Controller, as well as any useful information regarding the processing carried out by the Data Controller;
- **Rectification:** the right to obtain the rectification and/or correction of inaccurate personal data concerning you held by the Data Controller;
- **Erase:** where the relevant conditions are met, the right to request and obtain, without undue delay, the erasure of your personal data held by the Data Controller;
- **Restriction of Processing:** where the relevant conditions are met, the right to obtain restriction of the processing of your personal data;
- **Data Portability:** where processing is carried out by automated means and based on your consent or on the performance of a contract, the right to receive the personal data you have provided to the Data Controller in a structured, commonly used and machine-readable format, as well as the right to transmit such data to another controller without hindrance;
- **Objection:** the right to object at any time, on grounds relating to your situation, to the processing of your personal data based on the legitimate interests pursued by the Data Controller, unless the Data Controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms;

- Automated Decision-Making: the right not to be subject to a decision based solely on automated processing of your personal data, including profiling, where such decision significantly affects you.

You may exercise your rights in accordance with Article 12 GDPR and subject to the limitations provided for by Article 23 GDPR by contacting the Data Controller using the contact details indicated in this privacy notice or by contacting the DPO at: dpo.privacy@eng.it.

Without prejudice to any other administrative or judicial remedy, you also have the right to lodge a complaint with the competent supervisory authority (in Italy, the Italian Data Protection Authority – Garante per la protezione dei dati personali) where you believe that your rights relating to the protection of your personal data have been infringed. Further information is available on the website of the Italian Data Protection Authority: <https://www.garanteprivacy.it>.