

PRIVACY NOTICE — PROCESSING OF PERSONAL DATA

APPLICANTS FOR ADMISSION · ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

This Privacy Notice governs the processing of personal data collected when an individual expresses interest in, requests information about, or applies for admission to SM&P Executive Club™. Each application is assessed individually and does not confer any right to admission. Activities following any subsequent admission are covered, where necessary, by supplementary privacy notices.

01 DATA CONTROLLER

The Data Controller is Gian Andrea Magnani, a sole proprietorship operating under the commercial name Studio Magnani™ & Partners and promoting SM&P Executive Club™. Registered and operating address: Via San Gregorio 55, 20124 Milan (MI), Italy. VAT number: 01637600550.

Contacts for data protection enquiries and the exercise of rights: segreteria@pec.magnanigroup.it; alternatively, info@studiomagnani.eu, with “Privacy — Executive Club” in the subject line. If a Data Protection Officer (DPO) is appointed, the relevant contact details will be published through official channels.

02 DATA SUBJECTS AND DATA CATEGORIES

Processing concerns persons requesting information, prospective Members and candidates introduced by a referee. Data collected may include: first name, surname, contact details, residence or domicile, professional role and position, company, industry, experience, reasons for applying, indicative Membership level requested, any introducing person, correspondence and documents voluntarily submitted.

Technical and logging data strictly necessary for the operation of forms and system security may also be processed (e.g. submission date and time, logs and IP address, depending on the actual settings). Health data, criminal-record information and special categories of

data under Article 9 GDPR are not ordinarily requested. Candidates should not provide such data unless expressly requested through a separate procedure.

03 PURPOSES AND LAWFUL BASES

Handling enquiries and applications. Receiving forms, responding to enquiries, arranging meetings, processing applications and communicating outcomes: steps taken at the data subject's request prior to entering into a contract (Article 6(1)(b) GDPR).

Assessment and protection of the Club environment. Assessing the candidate's alignment with admission criteria, preventing misuse and protecting reputation, confidentiality and security: the Controller's legitimate interests (Article 6(1)(f) GDPR), subject to an appropriate balancing assessment where applicable.

Legal obligations and protection of rights. Compliance with applicable legal requirements: legal obligation (Article 6(1)(c)); handling disputes and defending rights: legitimate interests (Article 6(1)(f)), to the extent relevant.

Separate promotional communications. Newsletters, events and offers not necessary to respond to or assess an application: specific, optional and withdrawable consent (Article 6(1)(a)), where required by applicable law. Withholding consent does not affect the consideration of an application.

04 PROVISION OF DATA AND CONSEQUENCES

Fields marked as mandatory are necessary to handle the enquiry and assess the application; failure to provide them may prevent the process from continuing. Optional information helps us understand the candidate's profile. Consent to promotional communications, where requested, remains separate and optional.

05 SOURCES OF PERSONAL DATA

Data are collected directly through landing pages, forms, emails, meetings and documents. They may also originate from an introducing Member, a professional contact or publicly accessible professional sources, solely to the extent relevant to the application.

Where data are not obtained from the data subject, the information required by Article 14 GDPR is provided within the statutory time limits, generally within one month of collection and in any event at the first communication, subject to applicable exceptions.

06 ADMISSIONS COMMITTEE AND ASSESSMENT

Applications are reviewed by the Membership Office and, in accordance with internal rules, by the Evaluation and Admissions Committee. Access to data is restricted to authorised persons involved in the process and bound by confidentiality obligations.

Assessment considers relevant information, professional experience and alignment with the Club's identity. No decisions producing legal or similarly significant effects are based solely on automated processing within the meaning of Article 22 GDPR, unless specifically disclosed in a future notice.

07 RECIPIENTS AND PROCESSORS

For handling enquiries, data are processed primarily by the sole proprietorship Gian Andrea Magnani, acting as Controller and operating under the commercial name Studio Magnani™ & Partners. Collection, recording, retention and management of data and forms may be performed using IT platforms and services provided by external parties engaged for the relevant technical and document-management activities. Such parties process data only within the scope of their services and, when acting on behalf of the Controller, under agreements compliant with

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Article 28 GDPR. Internal access is restricted to authorised personnel, the Membership Office, members of the Evaluation Committee and any advisers involved, within their respective responsibilities.

For the provision of services by approved partner providers to admitted Members, the Controller may disclose only the contact and identification data strictly necessary: first name, surname, email address, telephone number and Member identification number. As a rule, any further data needed to deliver a service are provided directly by the Member to the relevant provider, which issues its own privacy notice when acting as an independent controller. Submission of an application alone does not entail disclosure of data to approved service providers. No indiscriminate sale or disclosure of data for commercial purposes is envisaged.

08 INTERNATIONAL TRANSFERS

The use of IT platforms and external providers for collecting, managing, storing and archiving data may, depending on the infrastructure and subprocessors actually used, involve access to or transfers of data outside the European Economic Area. Where such transfers occur, the Controller applies the conditions and safeguards provided for in Chapter V GDPR, including, where appropriate, adequacy decisions or standard contractual clauses and any necessary supplementary measures. Information about the safeguards adopted may be requested from the Controller.

09 RETENTION

Data are retained for as long as necessary to manage the enquiry and assessment process. For unsuccessful or uncompleted applications, the Controller envisages a maximum retention period of 12 months from closure of the procedure, except where disputes, legal obligations or a duly justified request to

maintain future contact on an appropriate lawful basis apply.

If admitted, data required for the Membership relationship and access to partner services are processed under the specific Member Privacy Notice. Disclosures to service providers are subject to the principles of data minimisation and necessity described in Section 07. Records subject to administrative and tax obligations are retained for the statutory periods; promotional data are retained until consent is withdrawn or in accordance with formally adopted retention criteria.

10 SECURITY AND CONFIDENTIALITY

Technical and organisational measures appropriate to the risks are adopted, including access controls, authorisation management, credential protection, backups and supplier security measures, according to operational settings. Confidentiality of applications is an organisational principle of the Club, without implying that any IT system can guarantee zero risk.

11 DATA SUBJECT RIGHTS

Data subjects may request access, rectification, erasure, restriction and, where applicable, data portability; they may also object to processing based on legitimate interests on grounds relating to their particular situation. Consent may be withdrawn at any time without affecting the lawfulness of processing carried out before withdrawal.

Requests should be sent to the Controller using the contact details in Section 01. Data subjects also have the right to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it) and to seek a judicial remedy before the competent courts.

12 COMMUNICATIONS AND CONSENT

Responses to applications, acknowledgements of receipt, requests for additional information and outcome notifications form part of application management and do not require separate marketing consent.

Any checkboxes for promotional consent must be separate from the acknowledgement of having read this Notice, must not be pre-ticked and must be recorded as evidence of the individual's choice. Acknowledging the Notice does not constitute general consent.

13 UPDATES AND SCOPE

The Controller may update this Notice following legal, organisational or technological changes and make the revised version available through official channels. Material changes will be communicated where required by law.

This Notice concerns enquiries and applications only. Any subsequent Membership relationship, including management of approved partner services, will also be governed by a specific Member Privacy Notice. Notices issued by providers acting as independent controllers and the cookie policies of websites and landing pages remain separate.

14 DOCUMENT REFERENCES

SM&P Executive Club™ — Privacy Notice for applicants for admission. Document code EC-PRIV-003 · Master EN Rev.05 · Issue date: 10 October 2026.