

PRIVACY INFORMATION NOTICE FOR CALLERS

1. Introduction

Safestore Italia Trading S.r.l. trading as EasyBox (hereinafter referred to as "**EasyBox**", "**Company**" or "**Data Controller**"), acting in its capacity of data controller, hereby informs any caller or recipient of inbound or outbound calls of the EasyBox Customer Service (hereinafter, the "**Caller**") about the methods and purposes of the processing of their personal data in the context of the Customer Service, in compliance with Legislative Decree. no. 196/2003 as subsequently amended and supplemented by Legislative Decree no. 1010/2018 (hereinafter, "**Privacy Code**") and with the European General Data Protection Regulation no. 679/2016 (hereinafter, "**GDPR**").

In particular, any calls received from Data Subjects will be managed by the Company in accordance with Article 130 of the Privacy Code, as well as, more generally, with the provisions of the GDPR and the measures and guidelines issued by the Italian Data Protection Authority concerning the management of calls with the Company.

Please note that this notice is intended to supplement the short-form notice provided during any conversations with the Company's operators.

2. Who Is the Data Controller?

Safestore Italia S.r.l trading as EasyBox, with registered office in Milan, VAT No. 13603260962 which can be contacted at the email address PrivacyOfficer@Safestore.co.uk, is the data controller in relation to the processing of Callers' personal data described in this privacy information notice (hereinafter, "**Privacy Notice**").

3. Who Does This Privacy Notice Apply To?

This Privacy Notice applies to the processing, by the Data Controller, of the personal data of its Callers, including clients and prospects, be they natural persons or sole proprietors, who request information and/or subscribe the self storage services offered by the Data Controller by telephone through EasyBox Customer Service (hereinafter, also the "**Data Subjects**").

4. What Personal Data Are Collected?

The Company processes the following categories of personal data relating to Callers:

- **Personal details**, including name and surname, and date of birth;
- **Contact details**, including address, telephone number, and e-mail address;
- **Personal identification documents**, such as a driving license and utility bill;
- **Company information**, including the company name, registered and secondary office addresses (if any), VAT number and/or tax code;
- **Sales call recordings**, where necessary for the activation of the self storage services and/or for quality control purposes in relation to the customer care services provided by the Company. In this respect, calls between stores and employees using the Company's phone will not be recorded; and
- **Any additional personal data** relating to the Caller that may be collected by the Data Controller during the conversation with EasyBox Customer Service

(hereinafter collectively referred to as the "**Personal Data**").

During their conversation with EasyBox Customer Service, Data Subjects are recommended not to provide the Data Controller with Personal Data that is not necessary for the pursuit of the purposes set forth in this Privacy Notice.

5. What Are the Purposes of the Personal Data Processing?

The Company processes Personal Data for the following purposes:

- a) **Handling any requests for information** received by the Data Controller from Callers through EasyBox Customer Service;
- b) **Provision of the Company's self storage services**, including the conduct of any negotiations and the activation of requested services by telephone through the EasyBox Customer Service; and
- c) **Management of any claims and/or complaints** submitted by the Callers through EasyBox Customer Service.

(The purposes referred to under letters a), b), and c) are jointly defined as the "**Contractual Purposes**")

- d) **The compliance with the applicable legislation** (hereinafter, "**Law Purposes**");
- e) **Quality control purposes** relating to the customer care services provided directly by the Company;
- f) **Assessment of the effectiveness of customer care services** and proper orientation of training activities for individuals authorized to process Personal Data;
- g) **To exercise or defend the Data Controller's rights**, also with regard to credit recovery procedures, against Data Subjects or third parties in any dispute;
- h) **The performance of activities functional to completing a potential merger, sale of assets or business transfers or other transformations**

(the purposes as per letter e), f), g) and h) are jointly referred to as "**Legitimate Interest Purposes**").

6. On Which Legal Basis Does the Company Process Data?

The processing of Personal Data is necessary for the Contractual Purposes and Legal Purposes, as it is essential to manage any Callers' requests handled through the Company's Customer Service and/or complaints submitted by the Data Subject, as well as to comply with applicable legislation. Should the Data Subject fail to provide Personal Data for these purposes, the Company will be unable to address any requests submitted through EasyBox Customer Service.

In addition to the above, any calls received from Data Subjects may be carried out by the Company on the basis of Article 130 of the Privacy Code and, in any case, in compliance with the provisions issued by the Italian Data Protection Authority regarding call related operations, where applicable.

The processing of the Personal Data with regard to the Legitimate Interest Purposes is carried out pursuant to Article 6, letter f) of the GDPR, for the pursuit of the Company's legitimate interest, which is adequately balanced with the interest of the Data Subjects since the data processing is performed within the limits strictly necessary to perform the required economic activities and the other activities described in letters g) and h) above. The processing for the Legitimate Interest Purposes is not mandatory and the Data Subject can object to the data processing at any time as per paragraph 11 of this Privacy Notice, but in such case no data processing will be carried out for the Legitimate Interest Purposes, without prejudice to an overriding interest of the Data Controller in continuing the processing.

7. How Is Data Processed?

Personal Data is processed for the purposes above through adequate paper and electronic means and will be protected by appropriate measures to ensure the confidentiality and security of Personal Data. In particular, the Data Controller adopts appropriate organizational and technical measures to protect Personal Data against loss, theft, as well as unauthorized use, disclosure or modification of the Personal Data.

8. Who Can Have Access to Personal Data?

For the purposes set forth in paragraph 5 above, the following categories of recipients can access to Personal Data:

- The personnel belonging to the Data Controller or the subjects indicated below as data processors, within the scope of their respective duties and within the limits established by law;
- Any person the Data Subject has named as a contact to discuss the account or agent or representative given authority such as power of attorney, legal guardian or executor;
- Providers of support services, as well as of assistance or advice, to those carried out by the Data Controller, such as, by way of example but not limited to, legal, administrative and tax consultants, banks for the management of collections and payments arising from the execution of the Contract, auditing companies, suppliers of technological services, as independent data controllers or data processors;
- Customer enhanced liability cover (Store Protect) and/or Business or Company insurances and/or third-party insurance brokers or services;
- Sub-providers and/or sub-contractors engaged in activities connected to the management of the Customer Service, in their quality as data processors;
- Public bodies and/or judicial and/or control authorities, whose right to access the Personal Data is provided for by the applicable legislation, acting as independent data controllers; and
- Other companies belonging to the group the Data Controller is part of and/or subjects transferring a company or business, companies resulting from possible mergers or any other transformation involving the Data Controller, acting as autonomous data controllers.

The complete and updated list of the data processors is available upon request to the contact details indicated in paragraph 11 of this Privacy Notice.

In any case, Personal Data will not be disseminated.

9. Are Personal Data Transferred Abroad?

Personal Data may be transferred to countries outside the European Economic Area and, in particular, in the UK. In case of data transfer outside of the European Economic Area, Data Subjects' Personal Data will be transferred in the respect of the appropriate and suitable safeguards to carry out such transfer, pursuant to articles 44 et seq. of the GDPR.

10. Which Is the Data Retention Period?

Personal Data will be retained by the Data Controller for the time strictly necessary to achieve the purposes set out in paragraph 5 above and, with specific reference to the:

- a) Contractual Purposes, for the management of the Data Subject's request and for 10 years following the processing of the request, except in cases where further storage is required for possible legal disputes, requests by the competent authorities or pursuant to the applicable legislation;
- b) Law Purposes, for the duration prescribed for each type of Personal Data by the relevant laws;

- c) Legitimate Interest Purposes, for the management of the Data Subject's request and for the following 10 years, in the event the Personal Data are necessary to protect and enforce the Data Controller's rights against the Data Subject and/or third parties in any legal disputes. In the event the processing is aimed at carrying out activities functional to the transfer of a company or business, acquisitions, mergers or other transformations, the retention periods above will apply with respect to the main processing performed.

Please note that with specific reference to recordings and transcriptions of inbound and outbound calls to and from the Company's Customer Service, they will be retained after 30 days from their collection. Besides, there will be a deletion in less than 24 hours of call recordings that will not be made accessible to anyone relating to (i) calls with existing clients, (ii) calls that are not categorized as sales calls; (iii) calls that are not categorized within 24 hours. And to further limit the risk of retention of call recordings for longer than necessary, the Company instructs its employees to immediately categorize the call so that only sales calls with non-existing customers are retained for 30 days.

At the end of the retention period Personal Data will be deleted or anonymized.

11. What Are the Data Subject's Rights?

Notwithstanding the possibility for the Data Subjects to not provide their Personal Data, the Data Subjects, free of charge and at any given time, can:

- a) obtain confirmation of the existence of Personal Data relating to them;
- b) know the origin of the data, the purposes of the processing and its methods, as well as the logic applied to the processing carried out by electronic means;
- c) verify the accuracy of Personal Data and request its integration, update or amendment;
- d) request the erasure, anonymisation or restriction of the processing of Personal Data processed in breach of the applicable laws, and object, on legitimate grounds, to the processing of Personal Data;
- e) withdraw the previously given consents, if any;
- f) request the Company to limit the processing of the Personal Data where (i) the Data Subjects contest the accuracy of the personal data until the Company has taken sufficient steps to correct or verify its accuracy; (ii) the processing is unlawful but the Data Subjects do not want the Company to erase the Personal Data; (iii) the Company no longer needs the Personal Data for the purposes of the processing, but the Data Subjects require them for the establishment, exercise or defence of rights; or (iv) the Data Subjects have objected to processing justified on legitimate interests according to Article 21 of the GDPR, pending verification as to whether the Company has compelling legitimate grounds to continue the processing;
- g) object to the processing of the Personal Data for the Legitimate Interest Purposes;
- h) request the erasure of the Personal Data without undue delay;
- i) obtain the Personal Data portability.

Data Subjects will also have the right to lodge a complaint with the *Garante per la protezione dei dati personali* to the contact details available on the website www.garanteprivacy.it, provided that the legal requirements are met.

In case of the Data Subject's death, the aforesaid rights relating to its Personal Data may be exercised by anyone who has a personal interest or acts to protect the Data Subject as its representative, or for family reasons worthy of protection pursuant to article 2-*terdecies* of the Privacy Code. Data Subjects may expressly prohibit the exercise by its assignees of some of the rights above by written notice to be sent to the Data Controller as indicated below, without prejudice to their right to withdraw or modify such expressed intention later on according to the same procedure.

Requests for the exercise of rights may be made in writing to the Data Controller, who can be contacted at the following

e-mail address PrivacyOfficer@Safestore.co.uk

12. Changes and Updates

This Privacy Notice is valid from the date of effectiveness below. However, the Company may subsequently update or integrate, with prior notice, this Privacy Notice, also as consequence of possible subsequent amendments and/or integrations of the applicable laws. Changes will be notified in advance and Data Subjects will be able to consult the constantly updated version of this Privacy Notice on the Data Controller's website at www.easybox.it

15 December 2025