

**PRIVACY STATEMENT MADE PURSUANT TO ARTICLE 13 OF
REGULATION (EU) 2016/679 ON THE PROCESSING OF PERSONAL
DATA OF PERSONS WHO REPORT WRONGDOING
("WHISTLEBLOWING")**

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This information is provided by Studio Legale Grompe Redaelli e Associati with respect to the processing of personal data carried out by the same through the special channel for reporting violations of wrongdoing or irregularities, so-called Whistleblowing. If the report comes from a person linked by an employment or collaboration relationship with the STUDIO, this information must be understood as supplementing and not replacing the information given to personnel for the management of the employment relationship.

Who are we and where can you contact us?

STUDIO (C.F. 12994740152 / P. IVA 12994740152), headquartered in 20122 Milan, Corso Italia, 8, henceforth "Data Controller", or "Data Controller", protects the confidentiality of your personal data and provides them with the necessary protection from any event that may put them at risk of being breached.

What do we do with your personal information?

To this end, the Controller implements appropriate technical and organizational measures regarding the collection, use of personal data and the exercise of your rights under applicable regulations. Accordingly, the Controller takes care to update the regulations and procedures adopted for the protection of personal data whenever necessary and in any case in case of regulatory and organizational changes that may affect the processing of your personal data.

What are the legal bases for processing?

The Holder carries out processing based on the needs of:

- Legitimate interest: implementation of UNI PDR 125:2022 and Gender Equality Policies

What are the purposes of processing?

Personal information about you will be processed for the purpose of ensuring:

1. The proper and complete management of the Whistleblowing process in accordance with UNI PDR 125:2022;

2. the necessary investigative activities aimed at verifying the merits of the reported fact and the adoption of the consequent measures;
3. The protection in court of a right of the Data Controller;
4. The response to a request from the Judicial Authority or Authority assimilated to it.

How does the STUDIO collect and process data?

The Holder collects and/or receives the information provided by you by entering it on the internal Whistleblowing channel set up by STUDIO according to the technical-operational indications of Legislative Decree 24/2023, the Provisional Guidelines published by ANAC in June 2023 and the Guidelines published by Confindustria in October 2023.

The information collected concerns:

- 1 Personal and identified data of the reporter;
- 2 Personal and identifying data of the reported person(s) and/or third parties.
- 3 Voice stamp data in case the Report is recorded with your consent

What happens if you do not provide the data?

Providing the data of the reporter is mandatory in "reporting by name." Any refusal to provide the data in the "reporting by name" means that it is impossible for the Holder to follow up on the report you made.

To whom can the data be disclosed?

The communication of the collected personal data is mainly towards third parties and/or recipients whose activity is necessary for the performance of activities related to the management of the report, as well as to respond to certain legal obligations. In particular, the transmission may be made only to:

- 1 Whistleblowing Manager identified by the Owner;
- 2 external consultants (e.g., law firms) who may be involved in the investigation phase of the report;
- 3 corporate functions involved in receiving, reviewing and evaluating reports;
- 4 responsible for the function(s) affected by the report;
- 5 organizational positions in charge of conducting investigations of the report in cases where their knowledge is indispensable for understanding the reported facts and/or conducting the related instruction and/or processing activities, without revealing the identity of the reporter;
- 6 Institutions and/or Public Authorities, Judicial Authority, Police Bodies, Investigative Agencies;

Your personal information will in no way be disseminated or disclosed to

parties other than those identified above.

Where will your data be transferred to?

The Data Controller does not transfer your personal data abroad to third countries.

How and for how long is your data stored?

The processing of data concerning you is carried out through paper documentation and/or by means of digital tools made available to individuals acting under the authority of the Data Controller and authorized and trained for this purpose. These are granted the access to your personal data to the extent and to the extent that it is necessary for the performance of the preliminary activities for the processing of the report.

The Data Controller, including through the persons authorized for processing, periodically verifies that:

1. your data are not collected, processed, stored or retained beyond what is necessary;
2. your data are kept with adequate guarantees of integrity and authenticity and of their use for the purposes of the processing actually carried out;
3. your data are kept for the time necessary for the completion of the activities related to the management of the report you made and, in particular, no longer than the time predetermined in advance.

Specifically, the personal data collected shall be kept for a period not exceeding the definition and closure of the reporting process, starting from the date of receipt of the Report.

What are your rights?

Compatible with the purposes and limits established for the processing of personal data concerning you, the rights you are granted to enable you to have control of your data at all times are:

- access;
- rectification;
- erasure;
- limitation of processing;
- opposition to processing;
- portability.

Your rights are guaranteed to you without special charges and formalities for requesting their exercise in accordance with EU Regulation 679/2016.

Who can you complain to?

Without prejudice to any other administrative or judicial action, you may file a complaint with the Data Protection Authority.