

## Privacy Notice for Whistleblowers

### Art. 13, Data Protection Reg. (EU) 2016/679

Pursuant to the European Regulation 2016/679 ("**Regulation**" or "**GDPR**") and national legislation on the protection of personal data, Prelios Società di Gestione del Risparmio S.p.A. (hereinafter also "**Prelios SGR**") invites you to carefully read this Privacy Notice on the processing of your personal data, informing you as of now that the data you provide will be processed by the Data Controller in the manner indicated below.

#### 1. Definitions

The meanings the following terms used in this Notice are given in order to facilitate the comprehension:

- **Reporting Channel:** the portal for the management of Internal Reporting for the purposes of this Operational Standard managed externally and accessible from the Prelios Group website at the following page <https://prelios.com/it/governance/compliance/whistleblowing>;
- **Special Categories of Personal Data:** Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health or sex life or sexual orientation.
- **Whistleblowing Function ("Function"):** Internal office in charge of Whistleblowing Channel management activities. Three Whistleblowing Functions have been established within the Prelios Group: Whistleblowing Function of Prelios S.p.A., Whistleblowing Function of Prelios Credit Servicing S.p.A and Whistleblowing Function of Prelios SGR S.p.A. The latter is responsible for internal whistleblowing related to Prelios SGR.
- **Data:** means Personal Data and Special Categories of Personal Data.
- **Personal Data:** is such any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable person is one who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more characteristic elements of his or her physical, physiological, genetic, mental, economic, cultural or social identity.
- **Decree:** means Legislative Decree No. 24 of March 10, 2023.
- **Directive:** means EU Directive 2019/1937.
- **Prelios Group:** Prelios S.p.A. and its subsidiaries, namely: Prelios Agency S.p.A.; Prelios Credit Servicing S.p.A.; Prelios Credit Solutions S.p.A.; Prelios Innovation S.r.l.; Prelios Integra S.p.A.; Prelios Società di Gestione del Risparmio S.p.A.; Prelios Valuations & e-Services S.p.A.; Prelios Credit Agent S.r.l.
- **Law No. 179/2017:** means the Law on Whistleblowing, passed on 11/15/2017 to protect public and private employees, which requires that at least one alternative reporting channel be set up that is suitable for ensuring, by means of computer methods, the confidentiality of the Whistleblower identity.
- **Supervisory Body ("SB"):** means the body established by Prelios Group companies with the task, among others, of (i) supervising the functioning, compliance, effectiveness and adequacy of the Organizational, Management and Control Model of the companies pursuant to Legislative Decree No. 231/2001, and (ii) and updating the above mentioned documentation.
- **Whistleblowing Procedure:** the process adopted by the Data Controller in order to comply with the provisions of Legislative Decree No. 24/2023 regarding reports of unlawful acts

concerning behaviors, acts or omissions that harm the public interest or the integrity of Prelios Group companies.

- **EU Regulation 2016/679 ("Regulation" or "GDPR"):** means the Regulation of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).
- **Data Controller:** is the natural or legal person, public authority, service, or other body that processes Personal Data on behalf of the Data Controller. For the Whistleblowing portal adopted by the Prelios Group, Unione Fiduciaria S.p.A. was appointed.
- **Whistleblower:** the individual making a report.
- **Report:** the report submitted by a Whistleblower in accordance with the principles and rules set forth in the Whistleblowing Procedure adopted by the Data Controller in accordance with Legislative Decree No. 24/2023.
- **Data Processor:** Prelios Società di Gestione del Risparmio S.p.A. which determines the purposes and means of the processing of Personal Data of the Data Subject autonomously and independently each for its own business organization.
- **Processing:** means any operation or set of operations, performed with or without the aid of automated processes and applied to Personal Data or set of Personal Data, such as collecting, recording, organizing, structuring, storing, adapting or modifying, extracting, consulting, using, communicating by transmission, dissemination, or any other form of making available, comparing or interconnecting, limiting, erasing or destroying.

## 2. Data Controller

The Data Controller is Prelios Società di Gestione del Risparmio S.p.A. with headquarters at 15/17 Via Valtellina, 20159 Milan (MI).

In accordance with the provisions of Art. 37 et seq. GDPR, Prelios SGR has appointed a *Data Protection Officer* ("**DPO**"), who can be contacted at [privacy@prelios.com](mailto:privacy@prelios.com).

## 3. Personal Data

Depending on whether the Reporting is done anonymously or non-anonymously, the following Personal Data will be processed:

- Anonymous reporting:
  - In relation to the reported party: (i) personal data; (ii) employment status; (iii) relationship to the reported party;
  - In relation to any witnesses: (i) personal data; (ii) employment status; (iii) relationship to witness;
- Non anonymous Report: in addition to Data on the reported person and any witnesses:
  - In relation to the Whistleblower: (i) personal data; (ii) Contact Data; (iii) work qualification; (iv) Tax Fiscal Code (in italian: *codice fiscale*); (v) National ID (vi) any additional Data that is voluntarily provided as part of the report by the Whistleblower. In addition to Personal Data and Contact Data, the Data Processing may also refer to special categories of Data in accordance with Article 9 GDPR. Such Data will be used only where strictly necessary for the management of the Report, in full compliance with the principles of proportionality and necessity and, if deemed irrelevant for the purposes of the Report, will not be subject to further Processing.

The Processing of Personal Data is carried out through a special portal in the manner specified below.

#### **4. Purpose and legal basis for processing**

The Processing will be carried out in order to (i) collect and manage Reports from employees and collaborators of the Data Controller in relation to the commission of the offenses relevant according to the Legislative Decree No. 24/2023; (ii) allow the conduct of internal investigations aimed at verifying their substantiation and (iii) take appropriate actions to mitigate/eliminate their effects, submit requests, questions, expose various issues and/or add information to the Report made. In case of worthiness of the Report, additional information may be requested, including the indication of the Reporting Party's Personal Data in case it was not previously indicated, i.e. in case the Report was made anonymously.

The legal basis for the Processing is the fulfillment of regulatory obligations imposed by the legal system. In particular, the compliance with Law No. 179/2017 and Legislative Decree No. 24/2023, which transposed Directive (EU) 2019/1937 on Whistleblowing.

The internal investigation activities carried out in the course of the procedure are also carried out in accordance with the provisions of Legislative Decree No. 231/2001, where the Reports are relevant to the entity's administrative liability for crime.

#### **5. Methods of processing**

Your Personal Data will be processed in compliance with the applicable regulatory provisions on the Processing of Personal Data, both electronically and automatically and manually through the use of a special portal, which can be reached via the Internet at the following URL: <https://digitalplatform.unionefiduciaria.it/whistleblowingnew/it/accessoprincipale/identificazionegruppo?TOKEN=PRELIOS>

The portal ensures anonymous, untracked use of technical data related to the network or device being used and is designed, implemented, and managed to ensure the confidentiality of the identity of the Whistleblower, the protection of the persons involved and the Whistleblower, and to prevent access by unauthorized personnel.

#### **6. Data Retention Period**

Any Personal Data disclosed will be retained for the period useful for handling the Report and verifying its worthiness for a maximum period of 5 years. Within 7 days of receipt of the internal Whistleblowing Report, the Whistleblowing Function sends an acknowledgement of receipt to the Whistleblower via the Whistleblowing Channel. Within three months from the date of the acknowledgement of receipt, an acknowledgement is sent to the Whistleblower, which may consist of a notice of dismissal, a purely interlocutory notice aimed at requesting documentary or informational additions, the initiation of an internal investigation and, if necessary, the results thereof, the measures taken to address the issue raised, or referral to the competent authority for further investigation.

#### **7. Recipients of the Data**

The Personal Data communicated by you, or those relating to your person in the case of an identified Report, will be transmitted exclusively to:

- Competent Whistleblowing Function for Prelios SGR: each Internal Report will be viewable and manageable only by the competent Whistleblowing Function;
- only in the case of relevance under Legislative Decree No. 231/2001, the members of the Controller's Supervisory Board, the body responsible for overseeing the operation of and compliance with the company's organizational, management and control models, who may process them in their capacity as authorized subjects for Processing.

Your Data may be disclosed to external law firms and consultants as well as to local public authorities, where required by specific national and/or international regulations. We specify as of now that the portal used by the Prelios Group is managed by an external provider, appointed as Data Processor pursuant to Article 28 GDPR. The Data Processor does not have access to the content of the Report, in view of the security measures applied, including encryption tools.

In exceptional cases, referred to in Legislative Decree No. 24/2023, Personal Data could be processed by the Judicial Authority, the Court of Auditors and ANAC, as an external channel of the Reporting. The Company will inform anyone who is the subject of a Reporting, except where it is necessary to delay the notice to ensure the protection of the Reporting Party, the integrity of the investigation, and the preservation of relevant information.

## **8. Data Transfer**

As part of the Processing activity, Personal Data subject to the Reporting will not be transferred to countries outside the European Union.

In case of transfer of Data outside the European Union, the Data Controller ensures as of now compliance with the applicable legal provisions by entering, if necessary, into agreements that guarantee an adequate level of protection and/or the adoption of standard contractual clauses provided by the European Commission.

## **9. Rights of data subjects**

Pursuant to the GDPR, data subjects may exercise the rights set forth below:

- Obtain indication of the origin of the Personal Data as well as the purposes and methods of Processing, the logic applied in case of processing carried out with the aid of electronic instruments, the identification details of the Data Processor and managers as well as the subjects or categories of subjects to whom the Personal Data may be communicated;
- obtain the updating, rectification or, when interested, the integration of the data; the cancellation, transformation into anonymous form or blocking of Data processed in violation of the law, including those that do not need to be kept in relation to the purposes for which the Data were collected or subsequently processed; certification of the operations that have been brought to the attention of third parties, also as regards their content; of those to whom the Data have been communicated or disseminated, except where this proves impossible or involves the use of means manifestly disproportionate to the protected right.
- **object**, in whole or in part, for legitimate reasons to the Processing of Personal Data concerning them, even if relevant to the purpose of collection.

All Prelios Group companies have their registered offices at Via Valtellina, 15/17, 20159 Milan (MI) and act, with reference to the Reports addressed to each of them as autonomous Personal Data Controllers.

To exercise your rights as well as for any information related to the Processing of Personal Data, you can email [privacy@prelios.com](mailto:privacy@prelios.com) at any time.

## **10. Lodge to the Data Protection Authority**

The Data Subject always has the option of lodging a complaint with the Data Protection Authority, which can be contacted at <https://www.garanteprivacy.it/>.