

Privacy Notice for the Reported Party

Art. 14, Data Protection Reg. (EU) 2016/679 regarding personal data

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 Notice regarding the processing of your personal data. We inform you as of now that the data provided 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 dealing with internal whistleblowing of Prelios SGR.
- **Data:** means Personal Data and Special Categories of Personal Data.
- **Personal Data:** is 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 identity of the reporter.
- **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.

- **Reported Party:** the person who is reported under the Whistleblowing Procedure and to whom the Data refer.
- **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 Controller:** Prelios Società Gestione del Risparmio S.p.A., which determines the purposes and means of the processing of the Data Subject's Personal Data autonomously and independently.
- **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 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 the e-mail address: privacy@prelios.com

3. Personal data

Personal Data related to the Reported Party are collected through the Report and related documentation provided by the Whistleblower. Personal Data related to the Reported Party will be included in the following categories:

- Personal Data (e.g., first name, last name, place and date of birth);
- Contact information (e.g., e-mail address, phone number, mailing address);
- Data related to the work contract (e.g., hierarchical level, company area of membership, company role, type of relationship held with the Data Controller or other third parties, profession);
- any other information referring to the Reported Party that the Whistleblower decides to share with the Data Controller in order to better substantiate his or her Reporting, in relation to:
 - unlawful conduct relevant under Legislative Decree No. 231/2001 or violations of the entity's organization and management model;
 - irregularities and/or illegal conduct, commission or omission, which constitute or may constitute a violation of the principles enshrined in the Code of Ethics of the Prelios Group, company policies and rules and/or which may result in fraud or damage, even potential, to colleagues, shareholders and stake holders in general or which constitute acts of an illicit nature or detrimental to the interests and reputation itself of the Data Controller.

It should be noted that the Personal Data of the Reported Party and that are the subject of a Report cannot be known prior by the Data Controller but, based on the setting of the system used and the instructions included in the Prelios Group Whistleblowing Procedure, it is presumed that they may fall within the categories indicated above. In addition to the above and within the limits better specified below, it is specified that the Data Controller will inform the Reported Party again at the time of any actual receipt of a Report concerning him.

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 under Legislative Decree No. 24/2023.; (ii) allow the conduct of internal investigations aimed at verifying their worthiness and (iii) take appropriate actions to mitigate/eliminate their effects, submit requests, questions, expose various issues and/or add information to the Report made.

The legal basis for the Processing is the fulfillment of regulatory obligations imposed by the legal system. In particular, 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 accordance 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 Reporting Person, the protection of the persons involved and the Reporting Person, and to prevent access by unauthorized personnel.

6. Data Retention Period

Any Personal Data disclosed will be retained for the period useful for the management of the Report and the verification of its substantiation for a maximum period of 5 years.

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 supervising the operation of and compliance with the company's organizational, management and control models, who may process them 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 inform you 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 Report, except where it is necessary to delay the notice to ensure the integrity of the investigation and the preservation of relevant information.

8. Data Transfer

As part of the Processing activity, the Personal Data subject to the Report 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 into, if necessary, agreements ensuring an adequate level of protection and/or the adoption of standard contractual clauses provided by the European Commission.

9. Rights of data subjects

In general, under the Regulations, the Data Subject has the right to access his or her Data, in particular to obtain at any time confirmation of the existence or non-existence of the same and to know their content, origin, geographical location, as well as to request a copy. The Interested Party also has the right to verify their accuracy or request their integration, updating, rectification, restriction of Processing, cancellation, transformation into anonymous form or blocking of Data processed in violation of the law, as well as to oppose their Processing in any case. In addition, the Data Subject has the right to request the portability of his or her Personal Data. The Data Subject always has the possibility to lodge a complaint with the Data Protection Authority, which can be contacted at <https://www.garanteprivacy.it/>.

However, in the present case and in your capacity as a Reported Party, the rights under Articles 15 to 22 GDPR may not be exercised (by request to the Data Controller or by complaint to the Data Protection Authority

pursuant to Article 77 GDPR) if actual and concrete prejudice to the confidentiality of the identity of the Reported Party (see Article 2-undecies of the Privacy Code and Article 23 GDPR) and/or to the pursuit of the objectives of compliance with the legislation on Reporting of unlawful conduct may result. In particular, the Reported Party is informed that the exercise of these rights:

- will be carried out in accordance with the provisions of the law or regulations governing the sector (including Legislative Decree No. 231/2001 as amended by Law No. 179/2017);
- may be delayed, limited or excluded by reasoned communication made without delay to the Reported Party, unless the communication would jeopardize the purpose of the limitation, for the time and to the extent that this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the Interested Party, in order to safeguard the confidentiality of the identity of the Whistleblower;
- where appropriate, in such cases, the rights of the data subject may also be exercised through the Data Protection Authority in the manner set forth in Article 160 of the Privacy Code, in which case the Data Protection Authority shall inform the Data Subject that it has carried out all necessary verifications or has conducted a review, as well as of the Data Subject's right to seek judicial review.

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

The request will be analyzed by the appropriate bodies in order to balance the need to protect the rights of individuals with the need to combat and prevent violations of the rules of good corporate governance or applicable regulations in this area.

10. Timing of disclosure

In accordance with the indications of the European Supervisory Authorities, it is clarified that the specific disclosure with respect to the Personal Data processed by the Data Controller as a result of the Specific Report may also be made beyond the 30-day period referred to in Article 14(3) GDPR if making the disclosure would jeopardize internal investigations.

11. 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/>.