

LUISAVIAROMA

Information according to Articles 13 and 14 of the EU General Data Protection Regulation 2016/679 WHISTLEBLOWING

In accordance with Articles 13 and 14 of the EU Regulation 2016/679 ("GDPR"), LUISA VIA ROMA S.p.A. ("LUISAVIAROMA" or the "Data Controller") - with registered office in Via Benedetto Varchi, 61, 50132 Florence, Italy -, in the quality of Data Controller, in the person of its legal representative pro tempore, informs you that your personal data will be processed by LUISAVIAROMA itself by means of manual processing or electronic or automated, computer or telematic tools, with logics strictly related to the purposes listed below and, in any case, in such a way as to guarantee the security and confidentiality of the data.

Identity and contact details of the Data Controller and Data Protection Officer

The Data Controller is LUISA VIA ROMA S.p.A., in the person of its legal representative pro tempore, with registered office in Via Benedetto Varchi, 61, 50132 Florence.

The Data Controller has designated Ms. Angela Tavaglione as Data Protection Officer, whom you may contact in order to execute your personal data protection rights or to obtain information regarding the same and/or this Information Notice, by writing to LUISA VIA ROMA S.p.A., Via Benedetto Varchi, 61, 50132 Florence or by sending an e-mail to dpo@luisaviaroma.com.

Categories of personal data

The categories of personal data collected and processed are the common type of data (personal and contact data), fiscal code, home address, telephone number, e-mail, relationship with LUISAVIAROMA useful for the registration of a non-anonymous Report, the common type of data of the persons involved in the Report (e.g. name, surname, qualification) as well as any data contained in the identity document or other documentation produced for the purposes of the Report or otherwise necessary to verify the validity of the Report itself. In addition, the voice of the person making the report will be processed if he/she decides to use the voice messaging system available on the IT platform used.

In the instance of anonymous alerts, the voice of the reporter, if any, acquired by voice message will be appropriately masked and thus made unrecognisable.

According to the principle of minimisation, only the personal data necessary to enable the request to be fulfilled will be processed. Special categories of personal data and legal data, if not relevant to the case of the Report, should not be included in the Report by the user. In any case, should they be present, the Company shall not make any use of them, except in cases where the processing is necessary to ascertain, exercise or defend a right in a court of law and is authorised by law or by an order of the Authority for the protection of personal data or in any case by order of the Public Authority.

Purpose and lawfulness of the processing

The lawful basis for the processing of the data relating to the Report by the Data Controller can be found in the accomplishment of a legal obligation of the Data Controller (Art. 6(1)(c) GDPR).

The processing of the data of the whistleblower, of the reported person and of any subject provided in the context of the report, is carried out in the performance of its tasks of ascertaining possible offences/violations notified in the interest of the integrity of LUISAVIAROMA, pursuant to Art. 13- of Legislative Decree no. 24 of 10 March 2023 as well as of any regulations in force from time to time on the subject of internal systems for reporting violations.

The data provided by the whistleblower to represent alleged violations of which he/she has become aware, by reason of his/her relationship with LUISAVIAROMA or of the relationship with LUISAVIAROMA itself of the company to which the whistleblower is linked, committed by the persons who interact with him/her for various reasons, shall be processed in order to carry out the necessary investigative activities aimed at verifying the reported fact and at adopting the consequent measures.

The above data may also be used for the purpose of exercising or defending a right in judicial or extrajudicial proceedings, should this become necessary as a result of the Report, always in compliance with the confidentiality obligations set out in Article 12 of Legislative Decree 24/2023 pursuant to Article 6, paragraph 1(f) of the GDPR.

The whistleblower's consent is required, in accordance with the law, to record on a device suitable for storing and listening to the voice of the Whistleblower using the voice message function to make the Report and/or to communicate

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with the Report Manager (i.e. the person responsible for receiving and following up the Report designated by the Data Controller) within the dedicated IT platform.

The consent given may be revoked by the whistleblower at any time, without prejudice to the legality of the processing based on the consent given before the revocation.

Revocation of consent for voice messages must be communicated to the Report Manager via the platform's internal messaging system so that the procedure for inhibiting the listening in of voice communications already transmitted can be activated.

Nature of provision of data and consequences of failure

The provision of the above is mandatory for the registration of a non-anonymous Report and for verifying the validity of the Report. In the absence of the provision of the whistleblower's identification data, the Report will be treated as an anonymous Report and may be taken into account by the Report Manager if it provides sufficient information for verification of the Report.

The provision of the data required to record on a device suitable for storing and listening to the voice of the whistleblower using the voice message function, the lawfulness of which is based on consent, is, on the other hand, only optional.

Personal data processing methods

The data will be processed exclusively for the purposes set out above with the support of paper and/or electronic instruments, also automated with logic strictly related to the purposes and, in any case, in such a way as to ensure the security and confidentiality of the data.

In order to guarantee the confidentiality of the whistleblower, of the persons involved or in any case mentioned in the Report, of the content of the Report and of the relevant documentation during all the activities relating to the management of the Report itself, the process identified and the communication channels established by the Company are implemented in such a way as not to make the information and documentation mentioned above accessible to persons other than those authorised (the Report Manager and any additional persons appointed for verification and investigation activities), also by means of encryption tools.

Categories of personal data recipients

Personal data may also be communicated for the above-mentioned purposes to third parties belonging to the following categories who process them as autonomous Data Controllers

- a) Competent Public Authorities, Police Forces, Judicial Authorities
- b) Lawyers and freelance professionals who, by virtue of the type of profession they perform, act as autonomous data controllers.

In addition, the data may be processed by the following categories of persons as Data Processors specifically designated by the Data Controller, pursuant to Article 28 of the GDPR:

- a) external parties assigned for verification and investigation activities (e.g. consultants, law firms, investigative agencies)
- b) Moti-f s.r.l., owner of the Secure Blowing IT platform for the management of Reports and in the role of Reporting Manager designated by the Data Controller. This Data Processor has implemented security measures to ensure the utmost confidentiality, integrity and privacy of the personal data processed within the application platform and the management of the reports.

You have the possibility of requesting from LUISAVIAROMA the list of the Data Processors involved in these purposes by means of the communication methods present in the "Data Controller and Data Protection Officer" section.

Personal data may be processed by manual, computerised or telematic means, but always under the supervision of appropriate technical and organisational measures to ensure the security, integrity and confidentiality of the data and of the reporter, of the persons involved or referred to in the report, of the contents of the report and of the relevant documentation during all the activities involved in the management of the report itself, including, where possible, the

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use of encryption tools, in order to reduce the risks of destruction or leakage, even accidental, of the data, of unauthorised access, or of processing that is not permitted or does not comply with the purposes of collection. Personal data that identify or make the whistleblower identifiable are disclosed to parties other than the Report Manager only with the whistleblower's prior authorisation.

In any case, personal data processed for the handling of the report are not diffused.

Transfers outside the EU

For the pursuit of the processing purposes described above, your personal data may be transferred to the above recipients in Italy and abroad.

Under no circumstances will your personal data be transferred outside the European Union.

Data Retention Period

Personal data processed as part of a Reporting procedure are retained for as long as necessary for the processing of the Report and are deleted or anonymized after five years from the date of the communication of the final outcome of the Reporting procedure, unless their further processing is necessary for one or more of the following purposes: i) resolution of pre-litigation and/or litigation initiated before the expiration of the retention period; ii) to follow up on possible investigations/inspections by internal control functions and/or external authorities initiated before the expiration of the retention period; (iii) to comply with requests from Italian and/or foreign public authorities received/notified to LUISAVIAROMA before the expiration of the retention period. In case of application of one or more of the above mentioned hypotheses of suspension of the process of irreversible deletion/anonymization of personal data, the right of the Data Controller to restrict access to the identifying data of the Whistleblower remains unaffected, in accordance with and to the effects of art. 2-undecies, first paragraph lett. f) of Legislative Decree 196/2003, as amended by Legislative Decree 101/2018.

Automated decision-making process

In the pursuit of the processing purposes described above, no decision is made based only on the automated processing that produces legal effects concerning you or similarly significantly affects you.

Rights of data subjects

In accordance with and for the purposes of the GDPR, you are granted the following rights as a Data Subject, which you may exercise against LUISAVIAROMA, where the conditions are met and with the limits indicated below:

- a) access to and confirmation as to whether or not personal data concerning you are being processed, including for the purpose of being aware of the processing and to verify the lawfulness as well as the correctness and updating of such data. In such a case, you may obtain access to your personal data and to your information, in particular to information about the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the personal data have been or will be disclosed, the storage period, etc;
- b) the rectification, where inaccurate, of personal data concerning you, as well as the integration of the same where considered incomplete always in relation to the purposes of processing. During this period, the Data Controller is committed not to present the data as certain or definitive, especially to third parties;
- c) the cancellation of data concerning you, where the data are no longer necessary in relation to the purposes for which they were collected. Note that deletion is subordinated to the existence of valid reasons. If the Data Controller has disclosed data concerning you to other Data Controllers or Data Processors, it is obligated to delete them, adopting reasonable measures, including technical measures, to inform other Data Controllers who are processing the personal data in question to delete any links, copies or reproductions thereof (so-called "right to be forgotten"). Deletion cannot be performed if the processing is necessary, inter alia, for the fulfilment of a legal obligation or the performance of a task in the public interest and for the establishment, exercise or defense of a right in court;
- d) limitation of processing. Limitation of processing means, inter alia, the possibility of transferring the processed data to a system that is no longer accessible, for storage only, and unchangeable. This does not mean that the data are deleted but that the Data Controller must avoid using them during the period of the relevant blocking. This would be especially necessary in the event that persistent use of inaccurate data and unlawfully stored data would harm you. In such a case You may oppose the deletion of personal data and instead request that

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its use be restricted. In the case of rectification of data or opposition You may request the restriction of the processing of those data for the period during which the Data Controller is carrying out the rectification or is considering the request for opposition. A further case is due to the fact that personal data are necessary for you to establish, exercise or defend a right in court, but the Data Controller no longer needs them for the purpose of processing;

- e) opposition, at any moment, on grounds related to your particular situation, to the processing of personal data concerning you in cases where the processing itself is necessary for the performance of a task carried out in the public interest or in connection with the exercise of public powers vested in the Data Controller or if the processing is necessary for the pursuit of the legitimate interest of the Data Controller or of third parties. Finally, the Data Controller is committed to refrain from processing your data unless it can demonstrate that there are compelling legitimate grounds for processing or for the establishment, exercise or defense of a legal claim;
- f) right to withdraw consent at any moment without affecting the lawfulness of the processing based on the consent given before the withdrawal, only for the purposes whose legal basis is consent;
- g) to request, the portability of the data that the Data Subject has provided to the Data Controller, i.e. to receive, in a structured, commonly used and machine-readable format, the personal data concerning him or her provided to the Data Controller and the right to transmit it to another data controller without impediments, if the processing is based on consent or contract and is carried out by automated means. In addition, the Data Subject has the right to have personal data transmitted directly from the Data Controller to another third-party Controller if this is technically feasible.

In accordance with and for the purposes of Article 2-undecies, first paragraph, letter f) of Legislative Decree 196/2003 as subsequently amended and in implementation of Article 23 of the GDPR, the above rights (Articles 15 to 22 of the GDPR) may not be exercised, or their exercise may be delayed or limited, if the exercise of such rights may result in actual and concrete prejudice to the confidentiality of the identity of the person reporting violations of which he or she has become aware by reason of his or her employment relationship or duties performed. In such a case, data subjects may also exercise their rights through the Data Protection Authority in the manner provided for in Article 160 of the Legislative Decree 196/2003. The Data Subject shall receive reasoned and timely notice from the Data Controller of the limitation, delay or exclusion of the exercise of his or her right, unless the notice would jeopardize the very purpose of the limitation.

These rights may be exercised by contacting the Data Protection Officer (DPO) by request sent by certified mail to the following address: Via Benedetto Varchi, 61, 50132 Florence, or by sending e-mail to: dpo@luisaviaroma.com.

You may also promptly report to the DPO, using the contact details above, any circumstances or events from which a personal data breach may result, even if only potentially (i.e., any breach of security capable of resulting, accidentally or unlawfully, in the destruction, loss, modification, unauthorized disclosure of, or access to data), in order to allow for immediate assessment and, where necessary, action to be taken to counteract such an event.

Finally, note that you have the right to file a complaint with the Data Protection Authority or other supervisory authority in accordance with Article 13, second paragraph, letter d) of the GDPR.

Changes to this Notice

This Notice is subject to change. Therefore, you are advised to regularly check the section on the Secure Blowing portal, on the website www.luisaviaroma.com in the Whistleblowing Regulations section and on the Factorial portal.