ITALMOBILIARE
INVESTMENT HOLDING

REPORT MANAGEMENT
INFORMATION ON THE PROCESSING OF PERSONAL DATA
ARTICLES 13 AND 14 OF EU REGULATION 679/2016
FOR THE WHISTLEBLOWER AND FOR THE PERSON INVOLVED

Italmobiliare S.p.A. (hereinafter also referred to as just "**Italmobiliare**" or the "**Data Controller**"), as part of the process of managing reports of violations mentioned in Legislative Decree 24 of March 10, 2023, on *"Implementation of (EU) Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of EU law and laying down provisions concerning the protection of persons reporting breaches of national regulatory provisions"* (hereinafter "**Whistleblowing Report**" or "**Report**"), processes your personal data as a whistleblower (hereinafter the "**Whistleblower**") or as a person mentioned in the Report, i.e., as a person to whom the Report is attributed or as a person in any case involved (hereinafter "**Person Involved**").
We therefore provide you with information relating to the processing of your personal data, pursuant to and for the purposes of art. 13 and, limited to the **Persons Involved**, referred to in art. 14 of EU Regulation no. 679/2016 (hereinafter "**GDPR**").

	INFORMATION FOR WHISTLEBLOWERS	**INFORMATION FOR PERSONS INVOLVED**
Data Controller	Italmobiliare S.p.A. with registered office in Via Borgonuovo 20, 20121 Milan, Italy in the person of the legal representative *pro tempore* domiciled at the Data Controller's headquarters. You can contact the Data Controller at the following addresses: - by email: gdpr@italmobiliare.it - by ordinary mail: Via Borgonuovo 20, 20121 Milan, Italy The Data Controller may appoint other processors (hereinafter "**Processors**"), as well as persons authorised to carry out processing operations (hereinafter "**Authorised Persons**"). A complete and updated list of Processors and Authorised Persons is available by contacting the Data Controller at the contact details indicated above.	
Type of data processed	As part of the management of Whistleblowing Reports, only if the Data Controller decides to collect information concerning your identity, it may process personal data and in particular identification and personal data (including, by way of example and not limited to, name, surname, email address, images, voice, etc.) of the Whistleblower, as well as the data contained in the Report and the elements collected during the verification. The Data Controller may also process special categories of personal data (i.e. data capable of revealing racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of political parties, trade unions, associations or organisations of a religious, philosophical, political or trade union nature, as well as personal data suitable for revealing the state of health and sex life) and so-called "judicial" data (i.e. data relating to criminal convictions and crimes). We invite you to provide only the data necessary for the management of Whistleblowing Reports. Personal data that are clearly not useful for the processing of a specific Report, where possible, are not collected or, if collected accidentally, are deleted immediately.	As part of the management of Whistleblowing Reports, the Data Controller may process the data contained in the Report and the elements collected in the related verification. In particular, the Data Controller may process your personal data (including identification and personal data, images), special categories of personal data (i.e. data capable of revealing racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of political parties, trade unions, associations or organisations of a religious, philosophical, political or trade union nature, as well as personal data suitable for revealing the state of health and sex life) and so-called "judicial" data (i.e. data relating to criminal convictions and crimes). Personal data that are clearly not useful for the processing of a specific Report, where possible, are not collected or, if collected accidentally, are deleted immediately.

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Data source	Your data is collected directly from you when you send in a Report.	Your data is initially collected via a specific channel as part of the management of Whistleblowing Reports as a Person Involved. At a later stage, your data may be collected following a specific investigation by the Data Controller.
Purpose of processing your data	Your personal data will be processed, within the limits indicated above, for the purpose of receiving, analysing, documenting and managing the Whistleblowing Report, ascertaining the facts covered by it and adopting the consequent measures. If the Whistleblowing Report is deemed to be well founded, its contents will be used by the Data Controller to continue its investigations in order to ascertain the facts.	
Method of processing your data	The processing of your personal data takes place by means of personnel duly trained in the processing of personal data, specifically appointed as Authorised Persons or Processors by the Data Controller within the scope of their respective functions or professional appointment. In this regard, the Data Controller has formally appointed the Whistleblowing Manager (comprising the members of the Supervisory Body of Italmobiliare S.p.A.) in accordance with Article 29 of the GDPR and Article 2-quaterdecies of Legislative Decree no. 196 of 30 June 2003 (Privacy Code). The processing of your personal data can also take place through the use of electronic instruments or tools that are automated, computerised and telematic, following logic that is in any case strictly related to the purposes mentioned above in order to guarantee the confidentiality and security of your personal data. The Company processes the data in compliance with the principles of lawfulness, fairness, transparency, accuracy, integrity and without excess, relevance and necessity with respect to the purposes pursued, guaranteeing the protection of your privacy and your rights. The Report may be made through the following channels: - online platform [1], accessible from the “Whistleblowing” section of the Company's website; - ordinary mail, to be sent to: Italmobiliare S.p.A. – Via Borgonuovo 20, 20121 Milan (MI) – for the attention of the Supervisory Body – Italmobiliare; - meeting directly with the Supervisory Body. The Report may be documented in the following ways: - if a **recorded voice messaging system** is used, with the prior consent of the Whistleblower, the Report is documented by the Authorised Persons by recording on a device suitable for storage and listening or by means of a full transcription. In the case of transcription, the Whistleblower will be able to verify, rectify or confirm the content of the transcription by signing it; - when the Report is **made orally during a meeting with the Authorised Persons**, with the prior consent of the Whistleblower, the Report is documented by the Authorised Persons by recording on a device suitable for storage and listening or by taking minutes. In the case of minutes, the Whistleblower will be able to verify, rectify and confirm the minutes of the meeting by signing them.	
Storage times	Reports and related documentation are kept for the time necessary to process the Report and, in any case, for no longer than five years from the date of communication of the final outcome of the Report procedure. After these deadlines, the data will be deleted or rendered anonymous.	

[1] The online platform allows you to report both in written and oral form via voice messaging, appropriately disguised and therefore made unrecognisable thanks to an integrated voice distortion system.

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Provision of data and the consequences of any refusal	When you send in a Report, the provision of your personal data is absolutely optional. If you have expressly decided to reveal your identity when sending in the Report, your personal data will only be processed for the management of the Whistleblowing Report and any consequent actions. The disclosure of your identity and any other information from which such identity can be deduced directly or indirectly, to people other than those competent to receive or follow up on the Reports, even in the context of disciplinary proceedings, is only possible with your prior consent. Furthermore, if the Report is made via a recorded voice messaging system or orally during a meeting with the Authorised Persons, the Report may only be documented with your prior consent.	N/A
Legal basis of the processing	The legal basis for processing the data, including data relating to criminal convictions and offences, for the purposes of receiving, analysing and managing Whistleblowing Reports, as well as for ascertaining the facts covered by the Report and adopting the consequent measures, is compliance with the provisions of Legislative Decree 24 of 10 March 2023, "*Implementation of (EU) Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of EU law and laying down provisions concerning the protection of persons reporting breaches of national law*" and subsequent amendments pursuant to art. 6(1)c) of the GDPR. The legal basis of the processing operations indicated below, on the other hand, is the consent given pursuant to art. 6(1)(a) of the GDPR; and in particular, for: - revelation of your identity and any other information from which such identity can be deduced directly or indirectly, to persons other than those qualified to receive or follow up on Whistleblowing Reports; - revelation of your identity in disciplinary proceedings where the disciplinary charge is based, in whole or in part, on the Report and knowledge of your identity is indispensable for the defence of the person concerned; - documentation of the Report when it is made by means of a recorded voice messaging system or orally during a meeting with the Authorised Persons.	The legal basis for processing the data, including data relating to criminal convictions and offences, for the purposes of receiving, analysing and managing Whistleblowing Reports, as well as for ascertaining the facts covered by the Report and adopting the consequent measures, is compliance with the provisions of Legislative Decree 24 of 10 March 2023, "*Implementation of (EU) Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of EU law and laying down provisions concerning the protection of persons reporting breaches of national law*", as subsequently amended, pursuant to art. 6(1)c) of the GDPR.

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Categories of recipients	Your personal data and, more generally, all personal data communicated in the Whistleblowing Report, together with the supporting documentation, may be shared, in addition to the Supervisory Body in its capacity as Whistleblowing Manager, with the following parties bound by confidentiality (and to the extent strictly necessary): a) the Management Control Committee for Reports addressed to it; b) persons qualified to follow up on Reports; c) any external legal consultants who may provide consultancy services to the Company in relation to the management of Whistleblowing Reports; d) any third party acting as a Processor pursuant to Article 28 of the GDPR, which provides the cloud application used by the Company to manage Reports and retains the documentation uploaded thereto, as well as the Whistleblowing Report; e) subjects, bodies or authorities acting as independent data controllers, to whom the Company is required to communicate your personal data pursuant to legal provisions or orders issued by the authorities.
Transfer of data to third countries	Personal data will not be transferred to countries located outside the European Union.
Rights of data subjects	As provided for in arts. 13 and 14 of the GDPR, you can at any time: a) ask the Data Controller to access your personal data and rectify or erase them or limit how they are processed; b) revoke consent at any time without prejudice to the lawfulness of the Processing based on the consent given before the revocation; c) lodge a complaint with a supervisory authority. The above rights can be exercised with a request addressed without formalities to the Data Controller at the following addresses: - by email: gdpr@italmobiliare.it - by ordinary mail: Via Borgonuovo 20, 20121 Milan, Italy Note that the rights referred to in articles 15 to 22 of the GDPR cannot be exercised with a request to the Data Controller or with a complaint pursuant to article 77 of the GDPR if exercising these rights could result in actual and concrete prejudice: - to defensive investigations or to exercising a right in court; - to the confidentiality of the identity of the person making a Report pursuant to Legislative Decree 24/2023 and subsequent amendments.

November 11, 2026