

PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA OF THE REPORTING PERSON FOR REPORTS MADE PURSUANT TO THE WHISTLEBLOWING LAW

Unieuro S.p.A., before being able to acquire your personal data for the purpose of managing reports pursuant to the legislation on the so-called "Whistleblowing" (legislative decree n. 10 March 2023, n. 24), invites you to carefully read this privacy notice concerning the processing of personal data issued pursuant to art. 13 of EU Regulation 2016/679 (hereinafter, the "**Regulation**" or "**GDPR**")

The Data Controller makes this portal (hereinafter, the "**Portal**") available to allow the reporting of any illicit or illegitimate conduct or behaviour, whether committed or omitted, in the working context of Unieuro S.p.A. which constitute or may constitute a violation (direct or induced) of the Code of Ethics, of its Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001 (hereinafter, the "**231 Model**") or of the policies and/or rules which regulate company processes, as well as violations that consist of administrative, accounting, civil or criminal offenses or other violations of specific national and European provisions (of hereinafter, "**Report**").

Access to the Portal can be made in three ways: i) by registration, for users who intend to make a Report by releasing their identification data (name, surname, e-mail to confirm registration on the portal); ii) without registration, anonymously, for users who do not intend to release any identification data; iii) without registration, but with entry of identification data. Unieuro S.p.A. suggests making Reports using method i) or method ii), but in any case guarantees the protection and confidentiality of the whistleblower's identity through technical measures (encryption system integrated into the Portal) and organization (identification of specific internal functions in charge to the management of Reports and obliged to confidentiality). Further details on how Unieuro protects the confidentiality of the identity of the whistleblower are below, in the section dedicated to "Categories and types of personal data subject to processing".

For more information on the Portal, its functioning, the methods for forwarding Reports and their management by the internal functions appointed by Unieuro, you can consult the specific [FAQs](#).

1. Data Controller, Data Protection officer

The Data Controller of your personal data, or the subject who defines means and purposes of the processing of your personal data, is Unieuro S.p.A., with registered office in Via Piero Maroncelli n. 10, 47121 - Forlì (FC), at Palazzo Hercolani, Tax Code and VAT number 00876320409 (hereinafter, "Unieuro" or "Owner"). For any information regarding the processing of personal data by Unieuro, please fill in using the form available [here](#).

The Data Controller's structure is equipped with a Data Protection Officer (hereinafter, the "**DPO**") who is available for any information relating to the processing of your personal data at the address dpo@unieuro.com.

2. Categories and types of personal data subject to processing

In case of access through registration, the Portal will acquire the strictly necessary data to identify the reporting person and create a user account through which the user can track the progress of their Report (name, surname, email address). However, to ensure the protection and confidentiality of the reporting person's identity, the Portal transforms the reporting person's name and surname into an alphanumeric code (Unique Identification Code) that does not allow even the office responsible for managing the Reports to have visibility of the identifying data (e.g., name, surname) of registered users, unless they themselves choose to provide some for verification purposes (e.g., phone number). Such information may only be made visible to the Controller in the following cases: i) by obtaining the express consent of the reporting person for the disclosure of their identity, as provided by law (art. 12 of Legislative Decree no. 24 of March 10, 2023); ii) upon a specific request sent by the Controller to the Portal manager (including at

the behest of the judicial authorities), which must be adequately justified, only in cases required by law or by Model 231 where knowledge of the reporting person's identity is essential for disciplinary purposes or for the prosecution of a crime (defamation, slander, or, in general, cases of bad faith reporting provided for in the Whistleblowing Policy adopted by Unieuro).

In cases of access without registration, the Portal is set up so that the reporting person avoids entering identifying information. This is made possible by preselecting the option "NO" for entering identifying data and by suggesting to the reporter: 1) to register, obtaining the immediate encoding of their data, or 2) to make an anonymous report (to which a Unique Identification Code will be assigned, allowing Unieuro S.p.A. to provide feedback on the report). It should be noted that when the reporting person makes an anonymous report, in the cases mentioned in points i) and ii) above, the impossibility of identifying the reporting person may prevent Unieuro S.p.A. from managing the report in disciplinary, administrative, or criminal proceedings. The option for the reporting person to not register on the Portal remains available, and at the same time, even if they report without registering, they can choose to enter their identifying data, which will be visible in plain text to the internal functions responsible for managing the reports.

To further ensure the confidentiality and protection of the reporting person's identity, access to the Portal is subject to a "no-log" policy. This means that: i) if access is made from a device not connected to the company network, the data systems of the Data Controller are unable to identify the access point to the portal (IP address); ii) in cases where access occurs through a device connected to the company network (monitored by the Data Controller for legitimate purposes of safeguarding its information assets), Unieuro reserves the right to implement technical and organizational solutions to prevent tracing back to the user making the report.

During the investigative and inquiry activities following the receipt of a Report, the Data Controller may potentially request additional information (through the authorized functions and enabled features of the Portal) only to the extent that it is strictly necessary for evaluating the admissibility of the Report itself (verifying that the report falls within the scope of the Whistleblowing Policy and that relevant data and information have been provided for an initial assessment). If necessary, in cases required by law, the Data Controller may also request you to disclose your identity: in such cases, Unieuro will only use your data with your explicit consent

During the submission of a Report through the Portal, we kindly ask you not to provide data falling under the so-called "special categories" as defined in Article 9 of the GDPR. This includes data revealing racial or ethnic origin, religious or philosophical beliefs, political opinions, membership in political parties, trade unions, associations or organizations of a religious, philosophical, political, or trade union nature, as well as personal data revealing health status, sexual life, or criminal records as defined in Article 10 of the GDPR. Unless strictly necessary for the submission of the Report, please refrain from including such information.

3. Purpose and legal basis for the processing of personal data

The purpose of the processing of your personal data is the management of the whistleblowing procedure. In particular, the processing entails: i) the need to assess the admissibility of the Report; ii) the need to verify its validity and, if applicable, to investigate the causes and consequences of the reported incidents, as well as the related responsibilities; iii) the implementation of corrective and preventive measures, as well as any disciplinary actions and, if necessary, reporting to the relevant authorities.

The legal basis for the processing of personal data provided in relation to the Reports is the legal obligation (Article 6(1)(c) of the GDPR) in accordance with the legislation set forth in Legislative Decree no. 24 of March 10, 2023.

4. Internal functions responsible for the processing

For the Data Controller, the internal functions involved in the examination process of the reports are Internal Audit, Head of the Legal Department, and Supervisory Body.

In cases specified by the Whistleblowing Policy – or whenever deemed appropriate – the functions responsible for managing the reports may: i) involve additional internal parties who are specifically designated and required to adhere

to specific instructions regarding the receipt, analysis, and management of the Reports; ii) inform the Board of Directors and the Board of Statutory Auditors.

5. Recipients and Transfer of personal data

Your personal data and, more generally, all personal data communicated with the Report, together with supporting documentation, may be shared, to the extent strictly necessary, with the following parties bound by confidentiality:

- a) any external legal consultants with whom Unieuro has entered into contracts for the processing of personal data pursuant to Article 28 of the GDPR, who therefore act as data processors and can provide consulting services regarding the management of the Report;
- b) Unione Fiduciaria S.p.A., with registered office in Milan, VAT number 01513210151, the provider of the Portal, specifically appointed as the data processor pursuant to Article 28 of the GDPR;
- c) subjects, entities, or authorities - autonomous data controllers - to whom it is mandatory to communicate personal data by virtue of legal provisions or orders from authorities.

6. Transfer of Data outside the EU

Your personal data will not be transferred outside the European Economic Area.

7. Data Retention

Your personal data will be retained only for the time necessary for the purposes for which it is collected, in accordance with the principle of minimization as stated in Article 5(1)(c) of the GDPR. Specifically, your personal data will be retained for five years from the submission of the Report, based on the statute of limitations period for any actions arising from the same Report.

Further information is available from the Data Controller, who can be contacted using the contact details provided above.

8. Means for processing personal data

The processing of personal data will be carried out through computer, manual, and/or telematic means, with methods strictly related to the purposes of the processing, ensuring the confidentiality and security of the data, and in compliance with the Regulations.

The processing of personal data will be conducted using processing methods related to the purposes described in this notice, ensuring the security and confidentiality of the data, with particular reference to the data of the reporting person, which will normally be protected by anonymity unless the reporting person consents to disclose their identity.

9. Your Rights

You have the right to request from the Data Controller, at any time, further information about the processing of your personal data, access to your personal data, rectification, or erasure of the same. Furthermore, you have the right to request the restriction of processing in cases provided for by Article 18 of the Regulation.

In cases where, upon explicit request from the Data Controller, you provide consent for the disclosure of your identity, you may revoke your consent at any time, provided that the Data Controller has not already disclosed your identity based on the previously and legitimately given consent.

Requests should be made in writing to the Data Controller or the Data Protection Officer using the contact channels indicated above.

In any case, you always have the right to lodge a complaint with the competent supervisory authority (Italian Data Protection Authority) in accordance with Article 77 of the Regulation if you believe that the processing of your personal data is in violation of applicable laws, or to take appropriate legal action (Article 79 of the Regulation).

Privacy Notice Whistleblowing – v. 2.0 – 15/07/2023