

Information on the protection of personal data pursuant to Articles 13 and 14 of European Regulation No. 2016/679 - General Data Protection Regulation ("GDPR")

Please find below the information, pursuant to the GDPR, regarding the processing of personal data acquired in connection with the processing of the whistleblowing reporting.

The **Data Controller** is Kairos Partners SGR S.p.A., with registered office in Milan, Via San Prospero n.2, legally represented by the Chief Executive Officer.

The **Data Protection Officer (DPO)**, as defined in the GDPR, can be contacted at the following e-mail address: dpo@kairospartners.com.

The **Privacy Referent for data subjects** is domiciled for this purpose at the Data Controller - e-mail: privacy@kairospartners.com.

Processing purposes

This information is provided for the purpose of fulfilling the legal obligations regarding the protection of personal data provided for by the GDPR as well as by Legislative Decree 24/2023, implementing EU Directive 2019/1937 regulating the protection of individuals who report violations of national or European Union regulatory provisions that harm the public interest or the integrity of the public administration or private entity, of which they have become aware in a public or private employment context.

Legal basis of the data processing

The personal data being processed are collected and processed in order to: (i) manage the reporting of the violation; (ii) manage the disciplinary proceedings based in whole or in part on the reporting.

The processing of personal data is based on the legal obligation to which the Company is subject pursuant to Article 6(1)(c) of the GDPR and, in particular, the obligation for certain private entities to establish an internal reporting channel pursuant to Legislative Decree 24/2023. It is also in the legitimate interest of the Company to create an effective system for the prevention of offences that may result in economic, financial and/or image damage to the Company.

Any processing of special categories of personal data within the meaning of the GDPR may only be carried out if, depending on the circumstances, it is necessary for the purposes of the fulfilment of the Data Controller's obligations under labour law, or if the processing concerns personal data made manifestly public by the data subject, or if the processing is necessary for the establishment, exercise or defence of the Controller's rights.

In relation to the aforementioned purposes, personal data are processed by means of manual, computerised and telematic tools in a manner and logic strictly related to such purposes and, in any case, in such a way as to guarantee the security and confidentiality of such data.

Categories of personal data processed

The personal data that may be processed are the following: name, surname, e-mail address of the reporting person, as well as further data and information related to the conduct reported. The data will be processed by means of information and paper media in such a way as to guarantee appropriate security and confidentiality measures. Special categories of personal data (*i.e.* data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or membership of a labour association, as well as genetic data, biometric data intended to uniquely identify a natural person) should not be included in the report unless strictly necessary, data relating to the person's health or sexual life or sexual orientation), nor judicial data relating to the reporting person or to third parties, unless strictly necessary to adequately circumstantiate the report, and in any case in compliance with the principles of proportionality and necessity.

The transmission of the identification data of the reporting person is optional. Anonymous reports, *i.e.* without elements that can identify the person submitting the report, are allowed. However, reports must be adequately

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Appartenente al Gruppo Bancario Banco BPM e soggetta all'attività di direzione e coordinamento di Banco BPM S.p.A.

circumstantiated and based on precise and consistent elements, so that the facts or situations described in the report can be related to specific contexts and the necessary investigations and assessments can be carried out to evaluate their merits.

Data retention periods

In relation to the different purposes for which they have been collected, personal data shall be kept for the time necessary for the management of the report and for the conduct of any proceedings arising from the report, and in any case no longer than five years from the closure of the report. Storage will, however, follow the principles of necessity, purpose, relevance, and non-excessiveness set forth in the GDPR.

Communication and transfer of data

In compliance with the principle of necessity, relevance and non excess, for the pursuance of the purposes indicated above, the personal data collected may be made accessible and processed by:

- personnel of the Company entrusted with the management of the report, acting on the basis of specific instructions provided by the Company as to the purposes and methods of processing;
- third parties whose involvement is necessary for the operation of the platform made available by the Company for the submission of reports, such as IT service providers;
- Authorities or public subjects according to the modalities required by the regulations in force.

The personal data collected are processed within the European Economic Area and will not be transferred outside the European Union.

Rights of data subjects

Articles 15 to 22 of the GDPR confer specific rights on data subjects. In particular, in relation to the data processing described in this notice, data subjects have the right to:

- receive confirmation of the existence or otherwise of the processing of their personal data and access to such data (right of access);
- update, amend and/or correct their personal data (right of rectification);
- request the deletion or restriction of the processing of their personal data (right to erasure and right to restriction), subject to an overriding public interest or a legal obligation of the Company to retain them;
- object, on legitimate grounds, to the processing itself (right to object);
- withdraw of the consent, where given;
- receive, in a structured, commonly used, and machine-readable format, personal data concerning them and transmit such data to another data controller (right to data portability);
- file a complaint with the Data Protection Authority.

In order to exercise these rights, for requests concerning the identity of the Data Processors appointed by the Company, and for the requests referred to in this information notice, you may contact the Internal Privacy Referent for data subjects, as indicated above, by post, including by e-mail at: privacy@kairospartners.com.

The Data Controller

Kairos Partners SGR S.p.A.