

"PRIVACY NOTICE" FOR REPORTING VIOLATIONS pursuant to LEGISLATIVE DECREE NO. 231/2001 and LEGISLATIVE DECREE NO. 24/2023 (so-called WHISTLEBLOWING)

Introduction

Digital Bros S.p.A. needs to process personal data that you will provide in the event of reporting alleged unlawful conduct and/or asserted irregularities of which you have become aware, in compliance with current regulations and ensuring from now on the full confidentiality of your identity, as outlined below.

The following provisions for the processing of personal data are therefore drafted in accordance with current European and Italian legislation, and in particular with the provisions of Regulation (EU) no. 2016/679 of April 27, 2016, General Data Protection Regulation ("Regulation"), as well as, if applicable, Legislative Decree June 30, 2003, no. 196 and subsequent amendments and in the context of carrying out the obligations provided for by Legislative Decree no. 231/2001 and subsequent amendments and by Legislative Decree no. 24/2023. Users ("User") are strongly advised to consult this document frequently to be aware of possible variations or modifications that may be made to it mainly due to regulatory changes.

Data Controller

The provisions of this Notice govern the processing of personal data by **Digital Bros S.p.A. with registered office at Via Tortona, 37 20144 Milan (Italy) as data controller ("Controller")**.

Data Protection Officer

The Controller has appointed, in accordance with Section 4 and art. 37 of the GDPR, a Data Protection Officer ("DPO") in the person of lawyer Veronica Devetag Chalaupka who can be contacted for all matters relating to the processing of your Data and the exercise of your rights. The DPO can be reached at the following addresses: **dpo@digitalbros.com** or by sending a communication to our headquarters.

Origin of Processed Data, Type, Purpose, and Legal Basis of Processing

The personal data processed by the Controller are those voluntarily provided by the data subject through the reporting of alleged unlawful conduct and/or asserted irregularities made - through the reporting channel implemented by the Controller pursuant to art. 4 of Legislative Decree no. 24/2023, by electronic means (hereinafter the "Report") - to the Committee composed of the following company representatives: - Internal Audit Function; - General Counsel of the Company; - HR Manager of the Company duly appointed as Data Processor/authorized under art. 29 GDPR. TYPE: the information subject to processing consists of ordinary personal data and possibly also of special nature.

PURPOSE:

the personal data will be processed - both through computer tools and paper supports - exclusively to pursue the following purposes: a) collect the Report; b) carry out verification and investigation activities regarding the facts indicated in the Report; c) take the consequent measures and carry out all the obligations provided for by current regulations. d) if, following a report, liability profiles emerge, proceed to transmit the report to the competent authorities.

LEGAL BASIS:

the legal basis for the processing on which the processing of personal data is based is the fulfillment of legal obligations. Period of Retention of Personal Data The data controller will retain the aforementioned personal data for a period not exceeding that necessary for the purposes for which they are processed, in compliance with the principles of adequacy, relevance, and minimization, periodically verifying the need for their retention. From this perspective, personal data that are clearly not useful for the

processing of a specific report are not collected, or, if collected accidentally, will be immediately deleted. Reports, internal and external, and related documentation are kept for the time necessary for the processing of the report and in any case not more than five years from the date of communication of the final outcome of the report procedure, in compliance with the confidentiality obligations under article 12 of this decree and the principle under articles 5, paragraph 1, letter e), of Regulation (EU) 2016/679 and 3, paragraph 1, letter e), of legislative decree no. 51 of 2018. The terms may be extended in the event of judicial or disciplinary action against the reported subject or the reporting subject who has made false and/or defamatory statements; in such cases, the Controller will keep the personal data until the conclusion of the relevant proceedings and will proceed with their deletion or anonymization upon expiration of the deadlines for filing an appeal.

Categories of Recipients of Personal Data

The personal data processed will not be disclosed to third parties. However, the following may become aware of such data, in relation to the processing purposes previously outlined:

- Subjects and Authorities authorized to access such information by virtue of regulatory provisions provided by European Union law or by the law of the Member State to which the data controller is subject;
- subjects who are part of the OdV acting as Data Processing Agents on the basis of an appropriate appointment act pursuant to art 29 of the GDPR (as provided by the Opinion of the Italian Data Protection Authority of May 25, 2020 on the subjective qualification for privacy purposes of Supervisory Bodies provided for by art. 6, Legislative Decree of June 8, 2001, no. 231), ensuring the confidentiality of the identity of the reporting person;
- employees of the Controller responsible for managing the Reporting Channel provided for in art 4 of Legislative Decree no. 24/2023 who act as Data Processing Agents on the basis of an appropriate appointment act pursuant to art 29 GDPR, ensuring the confidentiality of the identity of the reporting person;
- subjects involved in the management of the Report also within the intra-group relationships, acting as Data Processing Agents on the basis of an appropriate appointment act pursuant to art 29 GDPR, ensuring the confidentiality of the identity of the reporting person;
- subjects who operate, within the European Union or outside the EU, as Data Processors appointed by the Controller, auxiliary purposes to the activities referred to in paragraph 3., and therefore - for purely exemplary and non-exhaustive purposes - Consulting Companies, Law Firms, Subjects providing IT assistance and consultancy services or other companies and/or consultants appointed to provide specific services to the Data Controller, within the limits of the purposes for which personal data were collected and in compliance with the European Regulation and the technical and organizational measures prepared by the Controller to ensure an adequate level of security and respect for confidentiality.

The complete list of data processing managers is available by writing to privacy@digitalbros.com

Transfer of Personal Data to Third Countries

The data controller transfers your personal data to third countries. Your Data will be processed and stored by the Navex platform based in the UK and possibly in our management database located in Italy. For more information on the parties and countries involved, please send a request to the following email address: privacy@digitalbros.com

Any Automated Decision-Making Processes

The data controller does not intend to use automated decision-making processes, including profiling pursuant to Article 22, paragraphs 1 and 4, of the European Regulation. Therefore, the data controller believes it is not necessary to provide information on the logic used, as well as on the significance and consequences for the data subject relating to this type of processing. Data Subject Rights

Your Rights

At any time and without charges and particular formalities for your request, you have the right to obtain:

access to the data

data portability;

objection to processing;

rectification of data,

restriction of data processing,

erasure (right to be forgotten) of data; as well as the right to: withdraw consent; lodge a complaint with the supervisory authority (Privacy Guarantor).

If you believe that processing is in violation of your rights, you may lodge a complaint with the Data Protection Authority (www.garanteprivacy.it) if you believe that the processing of your data is contrary to the regulations in force (Article 77 of the GDPR) or take legal action (Article 79 of the GDPR).

You may exercise your rights at any time by writing to Digital Bros S.p.A. with registered office at Via Tortona, 37, 20144 Milan (Italy), attention of the Legal Representative, or by sending an email to the email address: privacy@digitalbros.com to the appointed DPO dpo@digitalbros.com.