

INFORMATION FOR WHISTLEBLOWING REPORTS

Information pursuant to articles 13 of EU Regulation 2016/679 and current national legislation on the protection of personal data - Reports of violations of national and European regulations (so-called *whistleblowing*).

Data controller : Land of Fashion Outlet Management S.r.l., with registered office in via Melchiorre Gioia 26 – Milano (MI), tax code and VAT number 06604130960 (hereinafter "**LFM**").

The Data Controller may process the personal data of the interested party in the context of the channels established in compliance with the applicable legislation, to allow the reporting of violations of national and community regulations that harm the public interest or the integrity of (so-called whistleblowing), as well as for the management of such reports.

whistleblowing reports " which contains, with different levels of detail, information on the violations that can be reported, on the conditions and methods for reporting and on the protections reserved by the applicable legislation to the subjects affected by the report.

Interested parties: the information applies to the subjects who report the aforementioned violations, to the reported subjects indicated as presumed responsible, to the subjects implicated in the violations, to the subjects aware of the facts or in any case mentioned in the report and to the facilitators.

Purpose and methods of processing: the Data Controller may process personal data for the receipt and management of the report, including the investigation phase, the application of corrective measures, the monitoring of their application and the updating of the reporter on the results of the procedure, his defense in court and/or the defense of the whistleblower.

The data processing takes place using manual, IT and telematic tools with logic strictly related to the purposes indicated and, in any case, in such a way as to guarantee the security and confidentiality of the data themselves, in compliance with current legislation on the subject and by applying technical and organizational measures. expected.

Legal basis: the processing activities are carried out on the basis of a legal obligation to which the Data Controller is subject (art. 6, par. 1, letter c) GDPR), pursuant to the applicable legislation on *whistleblowing* .

If, in the context of a report, particular categories of data are provided, the Data Controller will process them by virtue of the following exceptions provided for by the art. 9 GDPR consistent:

- in the need to fulfill the obligations and exercise the specific rights of the Data Controller or the interested party in matters of labor law and social security and social protection (art. 9, par. 2, letter b) GDPR);
- in the need to ascertain, exercise or defend a right in court or whenever the jurisdictional authorities exercise their jurisdictional functions (art. 9, par. 2, letter f) GDPR) with regard to the processing of personal data necessary in court of litigation or in pre-litigation proceedings, to assert or defend a right, including that of the Owner or a third party, in judicial proceedings, as well as in administrative or arbitration and conciliation proceedings.

Furthermore, with regard to the disclosure of the identity of the reporter to subjects other than those competent to receive the report and the usability of the report if the identity of the reporter is necessary for the defense of the reported person, in compliance with the provisions of art. 12 paragraphs 2 and 5 of Legislative Decree 24/2023 the legal basis is represented by consent.

The consent of the reporting party is also necessary for the storage of recordings and/or transcriptions of telephone calls, messages, conversations (art. 14 paragraphs 2 and 4 of Legislative Decree 24/2023).

Categories of personal data and sources of data origin: based on the experience of the Data Controller, the following personal data of interested parties may be processed:

- identification data;
- contact details;
- data relating to the alleged reported conduct, attributed to the reported person, in which the interested party could be involved or of which he could be aware;
- images and other documentation attached to the report;
- particular categories of personal data possibly contained in the report;
- contents of the communications exchanged between the reporting party and the subjects managing the report.
- any particular data subject to the report

The personal data of subjects other than the reporting party are usually provided by the reporting party through the report or by other interested parties (if these are interviewed during the investigation).

Communication of data: only subjects specifically authorized by LFM, possibly involved in the analysis and investigation, may become aware of the data. In any case, the identity of the reporter, and any other information from which it can be deduced, may be revealed

to parties other than those authorized/designated to manage the report or investigation on behalf of the Data Controller, only with the authorization of the reporting or when mandatory or legitimate pursuant to applicable legislation. In exceptional cases, if revealing the identity is indispensable for the defense of the reported person (as part of disciplinary proceedings) or of the person involved (as part of internal procedures), the reporting person will be informed, again via the platform, by LFM regarding the reasons for this communication which can only take place with your consent as indicated in the paragraph relating to the Legal basis. The protection of confidentiality is also guaranteed to other interested parties, until the conclusion of the procedure initiated due to the report and in compliance with the same guarantees provided in favor of the whistleblower. However, in the event that the report is reported to the competent authorities, the obligation to confidentiality of the identity of the people involved or mentioned in the report could cease in the ways and under the conditions established by the applicable legislation.

Furthermore, the data or part of the data may be shared with the following external parties, acting as independent data controllers or data processors as appropriate:

- lawyers and consultants, who provide consultancy or investigation services;
- judicial, supervisory, supervisory or police authorities, in the cases provided for by law.

To the extent strictly necessary and, in any case, subject to specific guarantees, the data may be processed by companies that provide the Data Controller with the platform for reporting, information systems and/or companies that are involved in their maintenance and security.

Personal data are not disclosed; are not transferred outside the EEA or, if they are, the transfer is supported by the guarantees referred to in Chapter V of the REG. EU 2016/679, furthermore the data will not be subject to fully automated decision-making processes.

Storage times: in compliance with the principles of proportionality and necessity, personal data will be stored in a form that allows the identification of the interested parties for the time necessary to process the report and, in any case, no later than five years from the date of the communication to the reporting party of the final outcome of the reporting procedure. This is without prejudice to any specific regulatory obligations or the arising need of the Data Controller to act or defend himself in court, which make it necessary to process and store the data for longer periods of time.

Mandatory provision of data: it is possible to submit a report anonymously or non-anonymously as indicated in the "Instructions for *whistleblowing reports*". In the event of an anonymous report, the Data Controller may not be able to effectively investigate the report. Therefore, where applicable, the reporting party is invited to report any violation by providing all the requested information, so as to allow the Owner to request further information. In any case, the Data Controller will ensure that all personal data processed in the context of the report remains strictly confidential.

Rights of the interested party: the interested party has the right at any time to obtain confirmation of the existence or otherwise of his data and to know its content and origin, verify its accuracy or request its integration or updating, or rectification (articles 15 and 16 of the GDPR). Furthermore, you have the right to request cancellation, limitation of processing, revocation of consent, data portability. The rights referred to in the articles. 15-22 of the REG: UE 2016/679 can be exercised through a complaint procedure to the Guarantor for the protection of personal data <https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>

LFM points out, however, that the exercise of the rights of the interested party could be limited or excluded, pursuant to the provisions of the Privacy Law, in the event that the exercise of these rights could result in an effective and concrete prejudice to the confidentiality of the identity of the reporter.

You have the right to lodge a complaint with the competent supervisory authority (for Italy, the Guarantor for the Protection of Personal Data, www.garanteprivacy.it), if you believe that the processing of your data is contrary to the legislation in force.

LFM has designated a Personal Data Protection Officer Inprivacy srl (so-called DPO Data Protection Officer) who can be contacted at: info@inprivacy.it

The Data Controller reserves the right to make any changes to this information that it deems useful, also in relation to the evolution of the legislation in force, giving it the widest visibility to interested parties.

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☐ Read and understood the information

☐ Possible consent to the processing of personal data for the disclosure of the identity of the reporter to subjects other than those competent to receive the report and the usability of the report if the identity of the reporter is necessary for the defense of the reported person, in compliance with the provisions from the art. 12 paragraphs 2 and 5 of Legislative Decree 24/2023 the legal basis is represented by consent.

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