

## PRIVACY INFORMATION NOTICE – WHISTLEBLOWER

(pursuant to Art. 13 of the Regulation (EU) 2016/679 - General Data Protection Regulation with the specific reference to the reporting of violations under the Legislative Decree n. 24/2023)

Pursuant to Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter "GDPR") and the applicable legislation on the protection of personal data, we inform you that the personal data provided as a Whistleblower (of also referred to as "Interested Party") through the "Form for reporting violations - (Whistleblowing)" or otherwise provided in the event of internal reporting of a violation pursuant to Legislative Decree 24/2023, will be processed in compliance with the aforementioned legislation and in accordance with the principles of correctness, lawfulness and transparency by personnel authorized by Tages Capital SGR S.p.A. pursuant to article 29 of the GDPR and article 2-quaterdecies of the code regarding the protection of personal data (Legislative Decree 196/2003).

### 1. Data controller and Data Protection Officer

Tages Capital SGR S.p.A. (hereinafter also "Company" or "Owner"), as data controller, with registered office in Milan, Corso Venezia n. 18, can be contacted at the email address [tagescapital@legalmail.it](mailto:tagescapital@legalmail.it).

The Company has appointed a Data Protection Officer (DPO) who can be contacted at the following email address [tages.dpo@avvera.it](mailto:tages.dpo@avvera.it)

### 2. Purpose and legal basis of processing

Personal data are processed for the management of internal reports of alleged violations, or behaviours, acts or omissions that harm the public interest or the integrity of the public administration or private entity, defined by art. 2 co. 1 letter a) of Legislative Decree 24/2023, of which the Reporting Person has become aware due to his/her collaboration relationship with the Data Controller. The personal data processed are those contained in the internal report, and/or in deeds and documents attached to it which refer to the Whistleblower.

Personal data may also be processed to carry out the necessary investigative activities aimed at verifying the validity of what has been reported, as well as, if necessary, for the adoption of adequate corrective measures and of appropriate disciplinary and/or judicial actions in address responsibility for violations. The legal basis that legitimizes the processing of personal data is represented by the fulfilment of a legal obligation to

which the Data Controller is subject (Art. 6 paragraph 1, letter c) of the GDPR), and specifically, provided for by the Legislative Decree. 165/2001, by Legislative Decree no. 231/2001 and by Legislative Decree no. 24/2023. The processing may also potentially concern particular data and data relating to criminal convictions and crimes if included in the report in accordance with the provisions of articles 9 and 10 of the GDPR.

### 3. Categories of data recipients

The personal data provided will be processed:

- by the "WB Manager" or by the "Back up Function" specifically authorized for processing by the Data Controller, in order to follow up and respond to the whistleblowing received, in compliance with the provisions of Legislative Decree 24/2023 and the Organisation, Management Model and Control pursuant to art. 6 of Legislative Decree 231/01.

If the Company entrusts the task of managing the reporting channel to a third party, the aforementioned personal data will be taken from this subject in the capacity of Data Processor designated by the Data Controller pursuant to art. 28 of the GDPR. Such data will be processed exclusively through expressly authorized personnel and in compliance with the provisions of Legislative Decree no. 24/2023.

Personal data will not be disclosed but may be transmitted to the Judicial Authority. None of the data collected will be transferred to Third Countries, meaning countries not belonging to the European Economic Area (EEA). If the report is external and is presented, as required by the articles. 6 and 7 of Legislative Decree 24/2023, to the National Anti-Corruption Authority (ANAC), information relating to the processing of personal data will be provided by the Authority itself through the appropriate channels.

### 4. Storage time

Whistleblowings and the related documentation will be kept for the time necessary to process the report and in any case no later than five years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations referred to in Article 12 of this Legislative

Decree 24/2023 and of the principle referred to in Articles 5, paragraph 1, letter e), of the GDPR and 3, paragraph 1, letter e), of Legislative Decree no. 51 of 2018. After the maximum period of five years, the information relating to the report may be retained by the Company in order to guarantee and preserve its right of defense and to provide proof, where required, of the correct management of the reports received. In this case the personal data of the Whistleblower will be anonymized.

Personal data that are clearly not useful for processing a specific report are not collected or, if collected accidentally, are deleted immediately.

## 5. Data processing methods

The processing of personal data will be carried out exclusively by expressly authorized personnel, in such a way as to guarantee the confidentiality of the identity of the Whistleblower and the content of the internal reports and the related documentation, adopting adequate technical and organizational measures to protect them from unauthorized or illicit access, from destruction, from loss of integrity and confidentiality, even accidental. Aimed to guarantee the confidentiality of the Whistleblowing for the entire duration of the management of the internal report, the identity of the same will be known by the subjects expressly authorized to manage the reports. Except for cases in which liability for slander and defamation is configurable pursuant to the provisions of the penal code or art. 2043 of the civil code or, where applicable, in the context of criminal proceedings and in the ways and limits of the provisions of the art. 329 c.p.p., the identity of the Whistleblower is protected in every context following the report. Therefore, without prejudice to the aforementioned exceptions, the identity of the Whistleblower cannot be revealed without his express consent, and all those who receive or are involved in the management of the report are required to protect the confidentiality of this information.

## 6. Provision of data

The provision of personal data is optional. Failure to provide information could, however, jeopardize the investigation of the report: anonymous reports, in fact, will be taken into consideration only if they are adequately substantiated and provided in detail, to bring out facts and situations connected to specific contexts.

## 7. Rights of interested parties

The rights referred to in articles 15-22 of the GDPR can be exercised, within the limits of the provisions of the art. 2-undecies, co. 3, of Legislative Decree no. 196/2003, by contacting the Data Controller or the DPO via the contacts indicated above. In particular, the rights identified above cannot be exercised with a request to

the Data Controller or the DPO, or with a complaint pursuant to Article 77 of the GDPR to the Guarantor Authority, if the exercise of these rights could result in actual and concrete prejudice to the confidentiality of the identity of the person who reports violations of which he or she becomes aware due to his or her employment relationship or the functions performed. The exercise of the aforementioned rights may, in any case, be delayed, limited or excluded with motivated communication made without delay by the Owner, unless the communication could compromise the purpose of the limitation, for the time and within the limits in which this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the Reporting Person, the Person involved or the people in various capacities involved in the reports. In such cases, pursuant to art. 2-undecies, co. 3, of legislative decree n. 196/2003 the interested party has the right to exercise the aforementioned rights through the Guarantor Authority in the manner set out in the art. 160 of the aforementioned legislative decree. In cases where it is believed that the processing of personal data occurs in violation of the provisions of the GDPR, it is possible to lodge a complaint with the Guarantor Authority, as provided for by the art. 77 of the GDPR itself (with the exclusion of the limitations on the exercise of the rights reported above and provided for by art. 2-undecies, co. 3, of Legislative Decree no. 196/2003), or to take action in the appropriate judicial offices ( art. 79 of the GDPR).