

Information ("Information")
pursuant to articles 13 and 14 of EU Regulation 2016/679 ("Regulation")

Madigest Firenze S.r.l. is the data controller (hereinafter "**Data Controller**") of personal data collected in the context of reports of violations of national or European Union regulatory provisions that harm the public interest or the integrity of the Data Controller (hereinafter "**Report Whistleblowing**").

This document integrates the additional information already provided previously (e.g. employees, suppliers, etc.) and therefore the information already provided there will not be repeated.

The Data Controller has appointed a Personal Data Protection Officer ("DPO") who you can contact by writing to dpo.madigest@vretreats.com

The personal data processed could be, only if you decide to reveal your identity, your personal data, as well as the identification data of the reported subject and the names of other subjects who can report on the facts subject to the Whistleblowing Report, as well as all the facts connected to your Whistleblowing Report.

In the context of reporting you could reveal particular data or judicial data; however, we encourage you not to do so unless strictly necessary for the purpose of Whistleblowing Reporting.

Your data is processed for the following purposes: to receive, analyze and manage the Whistleblowing Report. The legal basis for this treatment is the legal obligation and in particular the provisions of Legislative Decree 24/2023.

Any processing of personal data falling into the categories of particular data or judicial data is processed by the Data Controller in fulfillment of obligations regarding occupational safety and social security.

We specify that once the Whistleblowing Report has been managed, its content could be further used for the protection of the Data Controller in court and for the necessary defense actions. In this case, the legal basis for the processing of such personal data is the legitimate interest of the Data Controller.

The Whistleblowing Report could also be used for the establishment of disciplinary or sanctioning actions in the event that specious, retaliatory or discriminatory behavior is put in place to the detriment of the subject of the report or the whistleblower. This treatment is carried out on the basis of the applicable regulatory provisions (Legislative Decree 24/2023).

We remind you that you can also send a Whistleblowing Report anonymously which will still be taken into consideration and analysed. With reference to the identity of the reported subject, the provision of his data is similarly optional but the Whistleblowing Report could not be taken into consideration if this is not materially possible.

We specify that if you have decided to reveal your identity, your personal data will be processed only by authorized personnel who are committed to confidentiality, without prejudice to the communication obligations prescribed by law.

Your personal data may be shared, to the extent strictly necessary, for the aforementioned purposes with:

- Collective Bodies of the Data Controller in charge and only the subjects strictly necessary to follow up on the Whistleblowing Report who are committed to confidentiality, including the **facilitator**, where present;
- **subjects, entities or authorities** to whom it is mandatory to communicate your personal data by virtue of legal provisions or orders from the authorities;
- **any external legal advisors, as well as platform providers** with whom the Data Controller has entered into contracts for the processing of personal data and who act as data processors.

The processing of your personal data will be carried out both in an automated and manual form, guaranteeing the security and confidentiality of your personal data. This with particular reference to the data of the whistleblower who will be protected by anonymity (unless he does not want to report his identity).

The Data Controller, for the processing activities described up to now, does not transfer personal data outside the European Economic Area. Further information is available from the Owner.

Whistleblowing Reports will be handled within three months of the date of the acknowledgment of receipt or, in the absence of such notice, within three months of the expiry of the seven-day deadline from the submission of the Whistleblowing Report. Whistleblowing Reports and the related documentation are kept for the time necessary to process the Whistleblowing Report and in any case no later than five years from the date of communication of the final outcome of the Whistleblowing Report procedure, in compliance with the confidentiality obligations pursuant to article 12 Legislative Decree 24/2023 and the principle pursuant to art. 5, paragraph 1, letter e), of the Regulation

At any time you can ask:

- to **access your data**: we will provide you with the data we have about you, where applicable, the source of your data. This right cannot be effectively exercised by the person subject to a Whistleblowing Report;
- make your data **portable**: where applicable, we will provide you with an excel file containing the data we hold about you;
- **rectify** your data if you believe it is incorrect or needs to be updated;
- **limit** the processing of your data: for example, if you believe that our processing is illegal and/or that some processing carried out on the basis of our legitimate interest is inappropriate;
- **delete** your data;
- **object** to the processing of your personal data.

The response time required by the European legislation to which we are subject is 1 month from your request (extendable up to a further 2 months in case of particular complexity).

We specify that pursuant to art. 2 undecies Legislative Decree 196/2003, the rights referred to in articles 15 to 22 of the Regulation cannot be exercised with a request to the Data Controller or with a complaint pursuant to article 77 of the Regulation if the exercise of these rights could result in an effective and concrete prejudice to the confidentiality of the identity of the person who makes a Whistleblowing Report, prejudice which will be assessed on a case-by-case basis, in practice, and only where it is a necessary and proportionate measure. If the Data Controller makes use of this

limitation, it will be communicated to you without delay, in writing. We remind you that, in these cases, your rights can also be exercised through the Guarantor in the manner set out in art. 160 of Legislative Decree 196/2003 and subsequent amendments.

You can exercise your rights by writing an email to privacy.madigest@vretreats.com

You can always contact the DPO by writing to dpo.madigest@vretreats.com

In any case, you have the right to lodge a complaint with the competent Supervisory Authority (Guarantor for the Protection of Personal Data), pursuant to art. 77 of the Regulation, if you believe that the processing of your personal data is contrary to the legislation in force, without prejudice to the limits set out in art. 2 undecies of Legislative Decree 196/2003 above.