

PRIVACY POLICY PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) NO. 2016/679 concerning the processing of personal data in the context of whistleblowing

Pursuant to articles 13-14 of European Regulation 2016/679 ("GDPR"), we wish to inform you that NARDI S.p.A. processes the personal data ("Data") of people who report alleged unlawful conduct or violations that come to their attention in the work context, as identified by art. 3, para. 3 of Italian Legislative Decree 24/2023, as well as of the parties specified in art. 3, par. 5 of the aforementioned Decree (e.g. facilitators) and of parties other than those indicated above whose personal data is contained in whistleblowing reports and/or otherwise processed within the context of handling said reports (e.g. third party data) (hereinafter, all the aforementioned parties are referred to as "Data Subjects"). Therefore, in accordance with the principle of transparency, the following information is hereby provided to Data Subjects.

DATA CONTROLLER: IDENTITY AND CONTACT DETAILS. The Data Controller is NARDI S.p.A., VAT number 02114700244, with registered offices in Via delle Stangà 14, Chiampo (Vicenza, Italy) (hereinafter the "Company" or "Data Controller"). For any information, doubts or clarifications regarding the processing of data, you can contact the Data Controller by sending a registered letter with return receipt to the registered offices of the Company or by e-mailing marketing@nardioutdoor.com.

PURPOSES OF PROCESSING DATA. Data is processed for the sole purpose of managing and following up on whistleblowing reports received by the Company pursuant to the *Whistleblowing* legislation concerning the protection of persons who report violations that come to their attention in the work context (under Italian Legislative Decree No. 24/2023). "*Managing Whistleblowing Reports*" refers both to managing the channel(s) set up by the Company and to managing the reports received (e.g. for the purpose of carrying out the necessary investigations so as to verify the merits of the reported fact and taking subsequent action), in accordance with the procedure adopted by the Company for handling whistleblowing reports.

CATEGORIES OF DATA PROCESSED. In order to achieve the above purpose, the Data Controller processes any personal data contained in the report and any collected during its management. In particular, as appropriate, the Data Controller shall process:

- Personal data of a common nature (art. 6 of the GDPR), such as identification data (e.g. first and last name), location data (e.g. home address), contact data (e.g. telephone number, email), job/role, company, etc.;
- Special categories of personal data (art. 9 of the GDPR), such as data revealing racial or ethnic origin, political opinions, religious beliefs or trade union membership, or data relating to the health, sex life or sexual orientation of the data subject.
- Judicial data (art. 10 of the GDPR), i.e. data relating to criminal convictions and offences or related security measures.

LEGAL BASIS FOR PROCESSING. Data is processed:

- for personal data of a common nature: pursuant to art. 6, par. 1(c) of the GDPR, for compliance with a legal obligation to which the Company is subject (Italian Legislative Decree No. 24/2023);
- for special categories of personal data: pursuant to art. 9, par. 2(b) of the GDPR, for compliance with a legal obligation to which the Company is subject;
- for judicial data: pursuant to art. 10 and 88 of the GDPR (*). It should be noted that, as a general rule, the company does not process data of a judicial nature. The aforementioned data will only be processed by the Data Controller if: (i) the *whistleblowing* report contains such data; (ii) the processing of such data is necessary to manage the report; (iii) the cases referred to in articles 10 and 88 of the GDPR apply. Otherwise, the Data Controller will refrain from processing said data and will delete it whenever possible.

(*) See Measure No. 304 dated 6 July 2023 issued by the Italian Data Protection Authority.

It should be noted that, whenever the whistleblower uses the voice messaging system made available by the Company via the online platform, subject to the consent of the whistleblower pursuant to art. 14, para. 2 of Italian Legislative Decree No. 24/2023, the report shall be documented by recording it on a device suitable for storage and listening or by means of a full transcription.

PROCESSING METHOD. The processing of personal data will be carried out using paper and computerised methods in compliance with the provisions on the protection of personal data and, in particular, the appropriate technical and organisational measures pursuant to art. 32.1 of the GDPR, and with adoption of all the precautionary measures that guarantee its integrity, confidentiality and availability. In particular, please note that, in compliance with Italian Legislative Decree No. 24/2023, among other things the Company adopts encryption as a security measure, in order to guarantee confidentiality of the identity of the whistleblower, of the persons involved and, in any case, of the persons mentioned in the report, as well as of the content of the report and the related documentation. The processing operations referred to in this Policy are not subject to automated decision-making processes.

SOURCE OF PERSONAL DATA. NATURE OF THE CONFERRAL OF DATA AND CONSEQUENCES OF NON-CONFERRAL. Data, also from parties other than the whistleblower, may be included in the report and/or

collected subsequently while managing the report. The provision of personal data is necessary for submitting and managing a *whistleblowing* report. Anonymous reports will only be treated as regular reports if they are duly substantiated so as to bring to light facts and situations related to specific contexts.

CATEGORIES OF DATA RECIPIENTS. Data shall not be disseminated. The Company's personnel in charge of handling reports have been specifically authorised to process Data pursuant to art. 29 of the GDPR, subject to specific operating instructions received from the Data Controller. Please note that, if a report is transmitted to the competent authorities, Data may be made known to and processed by the latter in their capacity as independent data controllers. Data may also be communicated and/or made known to the Data Controller's service providers, who may process same, as appropriate, in their capacity as independent data controllers (e.g. lawyers) or data processors, pursuant to art. 28 of the GDPR (e.g. external vendor entrusted with maintaining the whistleblowing channel; external consultants handling reports). An updated Register of Data Processors shall be kept at the registered offices of the Data Controller and may be consulted by the data subject upon request.

DATA TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS. Data shall not be transferred to countries outside the European Union/EEA or to international organisations. If such a transfer should become necessary in order to achieve the purposes referred to in this Policy, the Data Controller guarantees that this will take place in full compliance with the conditions set out in Chapter V of the GDPR (articles 44 *et seq.*), to ensure that the level of protection of natural persons guaranteed by the GDPR is not undermined. Such transfers, therefore, will only take place to countries that the European Commission has deemed to guarantee an adequate level of protection, in accordance with the provisions of art. 44 of the GDPR or in compliance with specific standard contractual clauses approved by the European Commission pursuant to art. 46 of the GDPR, provided that the data recipient provides appropriate safeguards, and on condition that enforceable data subject rights and effective legal remedies for data subjects are available. Any derogation from the above will only take place in compliance with art. 49 of the GDPR.

STORAGE PERIOD OF THE PERSONAL DATA COLLECTED. Reports and the related documentation shall be kept for as long as is necessary to process same and, in any case, for no more than five years from the date of communication of the final outcome of the whistleblowing procedure, subject to confidentiality requirements. Please note that, once the aforementioned term has elapsed, data will be irreversibly erased or anonymised. Data may be stored for longer subject to legitimate requests made by the authorities or due to the Data Controller participating in legal procedures involving the processing of data.

RIGHTS OF THE DATA SUBJECT. LODGING A COMPLAINT WITH THE SUPERVISORY AUTHORITY. By contacting the Data Controller in the manner indicated in the section "DATA CONTROLLER: IDENTITY AND CONTACT DETAILS" of this Policy, data subjects have the right to exercise the rights granted to them by the GDPR - **within the limits of the provisions of art. 2 *undecies* of Italian Legislative Decree No. 196/2003 (**)** - that is: a) to request access to data concerning them; b) to request rectification of data; c) to request erasure of data, within the limits provided for by the GDPR; d) to request restriction of data processing, when the conditions set out in art. 18 of the GDPR apply; e) to request data portability in a structured format, in the cases referred to in art. 20 of the GDPR; f) to object to processing of data, pursuant to art. 21 of the GDPR. If the data subject considers that the processing of personal data relating to him or her infringes the provisions of the GDPR, he or she shall also have the right to lodge a complaint with the Supervisory Authority. Please note that, in Italy, this Authority is represented by the *Garante per la Protezione dei Dati Personali* (the Italian Data Protection Authority), which is based in Rome. Data subjects who do not reside in Italy may lodge a complaint with the designated Supervisory Authority in their country of residence.

In order to ensure the confidentiality of data subjects who seek to exercise their rights, requests should be sent with the wording "**REQUEST TO EXERCISE PRIVACY RIGHTS - WHISTLEBLOWING REPORT**" stated in the subject line of the email or on the envelope of the registered letter with return receipt.

()** Please note that the rights under articles 15 to 22 of the GDPR may not be exercised, either by sending a request to the Data Controller or by lodging a complaint with the Supervisory Authority, if the exercising of said rights were to prejudice, in real, concrete terms, the confidentiality of the identity of whistleblowers who report violations that come to their attention as a result of their employment relationship or their role within the work context.