

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

Shopfully S.p.A. is the data controller (hereinafter the "Data Controller") of the personal data collected in the context of reports of violations of national or European Union regulations that harm the public interest or the integrity of the Data Controller (hereinafter the "Whistleblowing Report"), as well as of the rules of conduct contained in the Code of Ethics and in the Organisational Model, pursuant to Legislative Decree 231/2001 by the Company.

This document integrates the further privacy notices already delivered. Therefore, the information already provided there will not be repeated.

The Data Controller has appointed a Data Protection Officer ('DPO'), whom you can contact by writing an email to dpo@shopfully.com.

The personal data processed could be, only if you decide to disclose your identity, your personal data, as well as the identification data of the reported person and the names of other persons who may report on the facts that are the subject of the Whistleblowing Report, as well as all facts related to your Whistleblowing Report.

In the context of the Whistleblowing Report, you may disclose particular or legal data; however, please do not do so unless strictly necessary for the purposes of the Whistleblowing Report.

Your data are processed for the following purposes: receiving, analysing and managing Whistleblowing Reports. The legal basis for such processing is a legal obligation and in particular the provisions of Legislative Decree 24/2023.

Any processing of personal data belonging to the categories of special data or legal data are processed by the Controller in accordance with labour safety and social security obligations.

Please note that once the Whistleblowing Report has been handled, its content may be further used for the Data Controller legal protection and necessary defence actions. In this case, the legal basis for the processing of such personal data is the legitimate interest of the Data Controller.

Whistleblowing reports may also be used to instigate disciplinary or sanctioning actions in the event that pretextual, retaliatory or discriminatory conduct is committed against the reported person or the whistleblower. Such processing is carried out on the basis of the applicable regulatory provisions (Legislative Decree 24/2023).

If a Whistleblowing Report is submitted orally, the Whistleblowing Report will be transcribed, subject to your express consent to the recording of the oral Whistleblowing Report. Please note that it is not compulsory to grant your consent to the recording of the Whistleblowing Report, and in the event of refusal to grant your consent, the Whistleblowing Report will still be handled, subject to transcription of its contents. Please note that you will always be able

to verify and confirm or amend the contents of the transcript of the Whistleblowing Report. The retention periods for this Whistleblowing Report are the same as those indicated below.

Please note that you may also submit a Whistleblowing Report anonymously, which will nevertheless be taken into account and analysed. With regard to the identity of the reported person, the provision of his/her data is similarly optional, but the Whistleblowing Report may not be taken into account if this is not materially possible.

Please note that if you have decided to provide your identity, your personal data will only be processed by authorised individuals who are committed to confidentiality, without prejudice to disclosure obligations prescribed by law. Your personal data may be shared, to the necessary extent, for the above purposes with:

- Collegial Bodies in charge of the Data Controller and only those persons strictly necessary to follow up the Whistleblowing Report who have committed themselves to confidentiality, including the **facilitator**, if any;
- **subjects, entities or authorities** to whom it is mandatory to communicate your personal data by law or by order of the authorities;;
- **any external legal advisers, as well as suppliers of the platform** with whom the Controller has entered into agreements for the processing of personal data and who act as data controllers.

The Controller, for the processing activities described above, does not transfer personal data outside the European Economic Area. Further information is also available from the Controller.

Whistleblowing Reports will be handled within three months from the date of the acknowledgement of receipt or, in the absence of such an acknowledgement, within three months from the expiry of the period of seven days from the submission of the Whistleblowing Report. Whistleblowing Reports and the related documentation shall be retained for the time necessary for the processing of the Whistleblowing Report and in any case no longer than five years from the date of the communication of the final outcome of the Whistleblowing Report procedure, in compliance with the confidentiality obligations set out in Article 12 of Legislative Decree 24/2023 and the principle set out in Article 5(1)(e) of the Regulation.

You can request at any time:

- to **access your data**: : we will provide you with the data we have on you, where applicable, the source of your data. This right is not actually exercisable by the person subject to Whistleblowing;
- to **correct** your data if you believe they are not accurate or need to be updated;
- **to restrict** the processing of your data: for example, if you believe that our processing is illegitimate and/or that some processing are carried out on the basis of our legitimate interest are inappropriate;;

- **to delete** your data.

The European response time to which we are subject is one month from your request (which can be extended up to a further two months in cases of particular complexity).

Please note that pursuant to Legislative Decree no. 196/2003, the rights set out in Articles 15 to 22 of the Regulation may not be exercised by making a request to the Data Controller or by submitting a complaint pursuant to Article 77 of the Regulation if the exercise of such rights would cause actual and concrete prejudice to the confidentiality of the identity of the person making a Whistleblowing Report, prejudice which will be assessed on a case-by-case basis, in concrete terms, and only where it is a necessary and proportionate measure. If the Data Controller makes use of this limitation, you will be informed of it without delay, in writing. We remind you that, in such cases, your rights may also be exercised through the Italian Data Protection Authority in the manner set out in Article 160 of Legislative Decree No. 196/2003 et seq.

You can exercise your rights by writing an e-mail to privacy@shopfully.com.
You can always contact the DPO by writing to dpo@shopfully.com.

In any case, you have the right to submit a complaint to the competent Supervisory Authority (Garante per la Protezione dei Dati Personali), pursuant to Article 77 of the Regulation, if you consider that the processing of your personal data is contrary to the legislation in force, subject to the limits set out in Legislative Decree 196/2003 above.