

This notice is addressed to whistleblowers, to anybody who assists whistleblowers in their reporting process (“facilitators”) and to any person that may be involved in the whistleblowing process, either as alleged wrongdoer or in any other role.

In accordance with Articles 13 and 14 of the General Data Protection Regulation (EU) 2016/679 (“GDPR”), Royalstampi S.r.l., acting as Data Controller, informs the recipients of this notice that their personal data collected within the framework of the Whistleblowing Procedure (“WP”) will be processed with the methods and for the purposes described below.

**Data Controller** The data controller is **Royalstampi S.r.l.**, V.le Lombardia 16 M/N, 20081 Cassinetta di Lugagnano (MI).

The following types of personal data may be processed:

**Which data are processed?**

- Identification and contact details of the whistleblower;
- Identification details of the persons involved in the whistleblowing; information relating to the reported breaches, including any personal data relating to special categories or to criminal convictions and offences;
- Any other information concerning the whistleblower, the persons involved in the whistleblowing, and any other third party the whistleblower involves to better describe the alleged infringement;
- Identification, contact details and details of the accounts used by whistleblowing managers to access the IT platform.

**The nature of data and their collection**

The personal data that will be processed are those provided by the whistleblower, and those that may be collected independently in the course of the necessary investigation activities, to ascertain the circumstances disclosed by the whistleblower.

Data must be provided in order to allow for the management of the information received from the whistleblower in accordance with the conditions described in the Whistleblowing Policy.

**Purpose of the processing**

Personal data will be collected and processed during all the activities required to address the reported misconduct, which may include:

- a) (a) a criminal offence which may result in a liability for Royalstampi S.r.l., including the crimes referred to in Legislative Decree no. 231/01, committed in the interest of to the benefit of the Company;
- b) a breach of the requirements of the Model (and its protocols), of the Code of Ethics, of internal procedures or policies;

in accordance with the procedures and instruments described in the Whistleblowing Policy.

**Legal basis**

Data are processed as required by the provisions of Legislative Decree no. 24/2023, as well as by the Organization and Management Model adopted by the company pursuant to Legislative Decree no. 231/2001 and the Code of Ethics.

**Retention period**

All the documentation relating to whistleblowing cases shall be kept for as long as necessary for the processing of the case and, in any event, for no more than five years from the date of notification of the final outcome of the whistleblowing procedure, in compliance with the confidentiality requirements that protect the whistleblower.

Any personal data that is not clearly useful for the assessment of the case shall be deleted immediately.

Personal data will be processed by the recipient of the whistleblowing, the Whistleblowing Manager, identified by the Company's Supervisory Board from among its external members (attorney Mr. Maurizio Monterisi and Mr. Diego Annarilli). In accordance with the applicable legislation and with the procedure adopted by Royalstampi S.r.l., the Whistleblowing Manager is required to protect the confidentiality of the identity of the whistleblower and of the information shared by them.

#### Recipients of of personal data

The identity of the whistleblower, or any other information which may directly or indirectly reveal his or her identity, can be disclosed only with the express consent of the whistleblower. Where necessary for investigational purposes, some information related to the whistleblowing may be processed by other functions and offices of the Company, such as the Supervisory Body created under Legislative Decree no. 231/2001, the Company's Directors, the Head of Human Resources, the Site Manager, and the Head of the function involved, in compliance with specific instructions and provided that these functions and offices have no conflict of interests with the subject matter of the whistleblowing. All these persons may also be informed of the outcome of the investigation that ascertained the grounds of the violation or wrongdoing.

The Whistleblowing Manager may also use external consultants, but only under additional confidentiality agreements protecting the identity of the whistleblower.

Where the Whistleblowing Manager is the alleged wrongdoer or the whistleblower, the whistleblowing case may be submitted to the Head of Human Resources.

The IT platform for the management of whistleblowing cases is called Secure Blowing and is managed by the company MOTI-F S.r.l., with registered office in Via Benedetto Croce n. 34 - Rome (Italy), which has been designated as data processor. The encryption system of the platform does not allow the person in charge to access the identity of the whistleblower or the content of the whistleblowing cases.

Finally, certain data may be transmitted, in the cases specified by the legislation, to the judicial authority and/or to other competent authorities.

Data Subjects may exercise rights on their personal data, as set out in CHAPTER III of Regulation (EU) no. 2016/679 ("GDPR").

Specifically, whistleblowers may exercise their right of accessing their data, rectify or integrated them, erase or restrict their processing by using the same procedure used for the whistleblowing

#### Rights of the Data Subject

Whistleblowers, as defined in Art. 77 of the GDPR, are also entitled to lodge complaints with the Data Protection Authority in the event that they consider that the processing of their data has violated the aforementioned Regulation.

Please be informed that the exercise of said rights by the other Data Subjects, such as the alleged wrongdoer and any other person involved, may be delayed, limited or excluded where such exercise could seriously and adversely affect the confidentiality of the identity of the whistleblower, as provided for in Art. 2-undecies, letter f, of the Privacy Code (implementing Art. 23 of the GDPR). In these cases, the aforementioned rights may be exercised through the authority for the protection of personal data ("Garante"), following the procedure specified in Art. 160 of the Privacy Code.