

PRIVACY NOTICE

pursuant to Articles 13 and 14 of EU Regulation 2016/679 Reporting
of breaches of national and European regulations (so-called 'whistleblowing').

Contship Italia Group, with its registered office at Via I Maggio 1, 20066 Melzo (MI), VAT No.: 02960210108, in its capacity as the data controller (hereinafter also referred to as the '**Controller**'), provides the following notice.

1. Scope of processing

This notice concerns the processing of personal data carried out by the Data Controller in both verbal and electronic formats, through the channels established in accordance with applicable legislation, to enable the reporting of breaches of national and European regulations that harm the public interest or the integrity of the Bank (so-called 'whistleblowing'), as well as for the management of such reports.

This policy should be read in conjunction with **the Whistleblowing Procedure**, which contains information on the breaches that may be reported, the conditions under which a report may be made, and the safeguards provided by applicable legislation for those affected by the report.

This policy applies to individuals who report the aforementioned breaches, to those named in the report as alleged perpetrators, to those involved in the breaches, and to those aware of the facts or otherwise mentioned in the report.

2. Purposes of processing

The Data Controller processes personal data for the following purposes:

- i. The receipt and management of reports, including the preliminary examination and investigation thereof, the implementation of corrective measures, the monitoring of their implementation, and keeping the reporting person informed of the outcome of the proceedings.
- ii. Purposes related to obligations laid down by laws, regulations and EU legislation, as well as by provisions issued by authorities legitimately empowered by law and by supervisory and control bodies (for example, the obligations laid down by anti-money laundering legislation, etc.).

3. Data subject to processing

In relation to the purposes indicated, the following personal data of data subjects may be processed:

- i. identification data;
- ii. contact details;
- iii. data relating to the alleged conduct reported, attributed to the person reported, in which the data subject may be involved or of which they may be aware;
- iv. images and other documentation attached to the reports;
- v. special categories of personal data that may be contained in the reports;
- vi. the content of communications exchanged between the reporter and the parties handling the reports.

4. Sources of data

Personal data relating to individuals other than the reporter is usually provided by the reporter via the report or by the other individuals concerned (where these are interviewed during the preliminary examination or investigation of the reports).

CONTSHIP ITALIA SpA

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1720378 Share Capital €33,800,000.00 fully paid up - www.contshipitalia.com

5. Legal basis for processing

Data processing activities are carried out on the basis of a legal obligation to which the Data Controller is subject (Article 6(1)(c) of the GDPR), in accordance with the applicable legislation on whistleblowing, specifically the provisions of Legislative Decree 24/2023.

Should special categories of data be provided in the context of a report, the Data Controller will process them by virtue of the following derogations provided for in Article 9 of the GDPR, namely:

- i. the need to fulfil the obligations and exercise the specific rights of the Data Controller or the data subject in relation to employment law, social security and social protection (Article 9(2)(b) of the GDPR);
- ii. the need to establish, exercise or defend a legal claim in court or whenever the courts exercise their judicial functions (Article 9(2)(f) of the GDPR) with regard to the processing of personal data necessary in the context of litigation or pre-litigation proceedings, in order to assert or defend a right, including that of the Data Controller or a third party, in court, as well as in administrative or in arbitration and conciliation proceedings.

6. Scope of data disclosure

Only those persons specifically authorised by the Data Controller, who may be involved in the analysis, investigation or preliminary inquiry into the report, may become aware of the data.

In any event, the identity of the whistleblower, and any other information from which it may be inferred, may be disclosed to parties other than employees or external parties authorised to handle the report or the investigation on behalf of the Data Controller, only with the whistleblower's authorisation or where required or permitted under applicable legislation.

In exceptional cases, where disclosure of the identity is essential for the defence of the person against whom the report is made (in the context of disciplinary proceedings) or of the person involved (in the context of internal procedures), the whistleblower will be informed in writing by the Data Controller of the reasons for such disclosure.

Confidentiality is also guaranteed to other data subjects until the conclusion of the proceedings initiated as a result of the report, and in accordance with the same safeguards provided for the whistleblower. However, should reports be the subject of a complaint to the competent authorities, the obligation to maintain the confidentiality of the identity of the persons involved or mentioned in the report may cease to apply in the manner and under the conditions set out in the applicable legislation.

Furthermore, data may be shared with the following external parties, who, depending on the circumstances, may act as independent data controllers or data processors:

- i. lawyers and consultants who provide advisory or investigative services;
- ii. judicial, supervisory, regulatory or police authorities, in the cases provided for by law.

To the extent strictly necessary and, in any event, subject to appropriate safeguards, the data may be processed by companies that provide the Data Controller with information systems and/or companies involved in their maintenance and security.

The Data Controller does not transfer personal data to countries outside the European Union or the European Economic Area.

7. Retention period for personal data

In accordance with the principles of proportionality and necessity, personal data will be retained in a form that allows for the identification of data subjects for the time necessary to process the report and, in any event, for no longer than ten years from the date on which the final outcome of the reporting procedure is communicated to the reporter.

8. Characteristics and methods of data provision

Reports may be submitted either anonymously or non-anonymously.

In the case of an anonymous report, the Data Controller may not be able to investigate the report effectively or adequately protect the confidentiality of the reporter's identity.

Therefore, where applicable, we invite you to report any breach by providing all the information requested (including your identity), so as to enable the Data Controller to request further information. In any event, the Data Controller will ensure that all personal data processed in the context of the report remains strictly confidential.

9. Rights under Articles 15–22 of the GDPR

The EU Regulation grants data subjects the right to exercise specific rights vis-à-vis the Data Controller.

In accordance with the provisions of Chapter III, Section I of the GDPR, you may exercise the rights set out therein and, in particular:

- i. Right of access: to obtain confirmation as to whether or not personal data concerning you are being processed and, if so, to receive information relating, in particular, to: the purposes of the processing, the categories of personal data processed and the retention period, and the recipients to whom such data may be disclosed.
- ii. Right to rectification: to have inaccurate personal data concerning you rectified without undue delay and to have incomplete personal data completed.
- iii. Right to be forgotten (right to erasure): to have your personal data erased without undue delay, in the cases provided for by the GDPR.
- iv. Right to restriction of processing: to have the Controller restrict the processing of your personal data, in the cases provided for by the GDPR.
- v. Right to data portability: to receive, in a structured, commonly used and machine-readable format, the personal data concerning you that you have provided to the Data Controller, and to have that data transmitted to another data controller without hindrance, in the cases provided for by the GDPR.
- vi. Right to object: to object to the processing of your personal data, unless the Data Controller has legitimate grounds for continuing the processing.
- vii. Right to lodge a complaint with the supervisory authority: to lodge a complaint with the Italian Data Protection Authority, Piazza di Montecitorio 121, 00186, Rome (RM).

10. Exercising your rights

To exercise the rights set out in the previous paragraph, and to receive further information, data subjects may visit our branches in person or submit a written request to **Contship Italia Group**, whose registered office is at Via I Maggio 1, 20066 Melzo (MI), email address: **privacy@contshipitalia.com**.

Pursuant to Article 12 of the GDPR, the Data Controller has one month from the date of the request to provide a response, giving reasons for any decision not to comply with the request. This period may be extended by two months, if necessary, taking into account the complexity and number of requests. The Data Controller shall inform the data subject of such an extension, and of the reasons for the delay, within one month of receiving the request.

In the event of no response from the Data Controller, or an unsatisfactory response, the customer may lodge a complaint or report with the Italian Data Protection Authority (www.garanteprivacy.it), or take the matter to the courts.

Please note, however, that the exercise of your rights may be restricted or excluded, pursuant to Article 2-undecies of Legislative Decree 196/2003; in particular, the rights referred to in Articles 15 to 22 of the Regulation may not be exercised by means of a request to the Data Controller or a complaint pursuant to Article 77 of the Regulation if

the exercise of such rights could result in actual and concrete harm to the confidentiality of the complainant's identity; such harm will be assessed on a case-by-case basis, in concrete terms, and only where it is a necessary and proportionate measure.

Should the Data Controller avail itself of this restriction, you will be notified without delay, in writing.

11. Data Protection Officer

The Data Controller, in accordance with Article 37 of the Regulation, has appointed La Scala Società tra avvocati per azioni as the *Data Protection Officer* (DPO) and, in particular, Mr Francesco Rampone, Solicitor, as the DPO's point of contact.

Melzo, 12 December 2023