

## **Whistleblowing**

Information notice on the protection of personal data (Pursuant to Articles 13 and 14 of European Regulation 2016/679)

CDP Real Asset SGR S.p.A. (hereinafter, "CDP RA" or "SGR"), in relation to the data processed for the purposes of receiving, analysing, investigating and managing the reports and any consequent actions, invites you to read the following information notice:

### **INFORMATION NOTICE PURSUANT TO ARTICLE 13 OF EUROPEAN REGULATION 2016/679 (GDPR)**

#### **1. Data Controller**

Pursuant to European Regulation 2016/679 (GDPR), CDP Real Asset SGR S.p.A., with registered office in Rome, via Alessandria 220 (00198), processes personal data in its capacity as "Data Controller" in compliance with the provisions of the law and wishes to inform you about the use of the aforementioned personal data.

#### **2. Type of data processed**

The data processed by CDP may include:

- i) personal data and contact information (e.g. first name, last name, type of relationship with CDP, etc.);
- ii) data and information that the whistleblower intended to provide to represent the facts described in the report. It should be noted that in this case CDP RA SGR cannot determine in advance the data to be reported, which may therefore also include specific data or data relating to criminal convictions and offences;
- iii) data and information that may be obtained during the necessary investigative activities for the purpose of verifying and closing the report.

#### **3. Purposes of the processing**

The processing of the personal data provided is aimed at receiving, analysing, investigating and managing the reports in accordance with the regulatory requirements set out in Law no. 179/17 as amended by Legislative Decree no. 24/2023 transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and laying down provisions regarding the protection of persons who report breaches of national laws. The processing may also be carried out to meet internal control requirements, to monitor business risks, to defend legal rights in court or to pursue the legitimate interests of the Data Controller.

#### **4. Method of processing and categories of data recipients**

Personal data are processed, for the purposes indicated and in compliance with applicable regulatory provisions, using manual, IT or telecommunications means, applying logics that are strictly related to those purposes and, in any case, in a way that ensures such data may be kept secure and confidential.

In order to achieve the above-mentioned purposes, the data will be processed by the responsible personnel, in accordance with internal guidelines, in a lawful and fair manner and, in any case, in accordance with the specific rules laid down by the regulations in force. The data may also be processed for the above purposes by external consultants and third parties with technical functions (e.g. the IT platform provider) who act as Data Supervisor/Data Controller who have signed a specific contract governing the processing entrusted to them and their obligations with regard to data protection and security of processing pursuant to Article 28, paragraph 3, of the Regulation. Finally,

personal data may also be transferred to other autonomous data controllers, on the basis of laws or regulations (e.g. Public Authorities, Judicial Authorities, etc.).

### **5. Storage of personal data**

The Personal Data will be kept only for the time necessary for the purposes for which they are collected in accordance with the principle of minimisation pursuant to Article 5.1.c) GDPR.

CDP RA SGR may retain certain data for the period of time required by applicable laws and regulations, as well as for the time necessary to enforce any legal rights.

### **6. Transfer of data outside the EU**

With regard to any transfer of Data to third countries, CDP RA SGR will process that data in accordance with the procedures permitted by applicable law, such as the consent of the data subject, the adoption of Standard Clauses approved by the European Commission, the selection of entities participating in international programmes for the free movement of data or operating in countries considered safe by the European Commission.

### **7. Rights of the data subject**

Lastly, we inform you that Articles 15-22 of the GDPR give data subjects the possibility of exercising specific rights. Accordingly, data subjects can obtain the following from CDP RA SGR: access, rectification, erasure, restriction of processing, withdrawal of consent and portability of the data concerning them.

The above rights may be exercised by sending a request by post to CDP Real Asset SGR S.p.A. with registered office in Rome, via Alessandria n. 220 (00198) to the attention of the Chief Risk Officer.

Pursuant to Article 2-undecies of Legislative Decree no. 196/2003, as amended and supplemented, (hereinafter, "Privacy Code") (transposing Article 23 of the Regulation), we inform you that the above-mentioned rights may not be exercised by any of the data subjects involved in the report (reported persons and/or other persons involved in the report), if the exercise of these rights may result in an actual and concrete prejudice to the confidentiality of the identity of the whistleblower.

The data subject is also entitled to file a complaint with the Italian Data Protection Authority.