Dear whistleblower,
we inform you that in the hypothesis of non-anonymous reporting UniCredit S.p.A. ensure you that in any case and circumstance ***your identity will be protected.***

The sensitive information, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health or sex life not relevant for the case, should be avoided in the reporting.

That been stated, you are invited to identify yourselves to allow your effective protection against any retaliation.

Where it becomes necessary to disclose your identity, as well as any other information from which such identity may be inferred, directly or indirectly, to persons other than those authorized to process such personal data pursuant to Articles 29 and 32 of the GDPR, these will be disclosed only with ***your express consent.***

INFORMATION NOTICE ON THE PROCESSING AND PROTECTION OF PERSONAL DATA

The following information aims to provide you (whistleblower, wrongdoer, witness, etc.) with an overview on the use of your personal data by UniCredit Factoring t S.p.A. and of your rights connected to the whistleblowing, pursuant to the General Regulations on the Protection of Personal Data - Regulation (EU) 2016/679 (hereinafter also GDPR) and of Leg. D. 2003/196, as integrated by Leg. D. 2018/101.

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller is UniCredit Factoring S.p.A., with registered office in Milan, Via Livio Cambi n. 5, 20151 Milan.

You can contact the **Data Protection Officer** at:

UniCredit S.p.A.
Data Protection Office
Piazza Gae Aulenti n. 1, Tower A, 20154 Milano
E-mail: Group.DPO@unicredit.eu, PEC: Group.DPO@pec.unicredit.eu.

2. PURPOSE AND LEGAL BASIS OF PROCESSING

UniCredit Factoring processes your personal data:

a) for the purpose to comply with legal obligations provided by the Legislative Decree n. 231/2001, Administrative liability of legal entities, companies and associations also without legal personality, sub. art. 6, as amended by the Legislative Decree n. 24/2023, and the art. 52 - bis of the Legislative Decree of September 1st 1993, n. 385;

b) on the basis of the legitimate interest of UniCredit Factoring, pursuant to art. 6, paragraph 1, lett. f) of the GDPR, to counteract any illegal conduct, for example referring to violations of the Code of Conduct and to the Code of Ethics of UniCredit.

These purposes represent the legal basis that legitimizes the related personal data processing.

3. THE CATEGORIES OF PERSONAL DATA

UniCredit Factoring processes personal data collected directly from you, or from third parties, which include, but are not limited to, **personal data** (e.g. name, surname, etc.) according to the principle of minimization and necessity; only the personal data necessary to complete the request for reporting will be processed.

Special categories of personal data[1](i.e. data allowing the disclosure such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health or sex life), if not relevant for the case of whistleblowing, should be avoided. In any case, UniCredit Factoring will process these data only for

[1] According to the article 9.1 of GDPR are "personal data revealing racial or ethnic origin, political opinions, religious or philosophical believes, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or personal's sexual orientation".

purposes strictly connected **and instrumental to verify the authenticity of the irregularities' reports** or in order to fulfill specific **legal obligations** (connected to the whistleblowing purposes).

Judicial data (i.e. personal data relating to criminal convictions and offences or related security measures), if not relevant for the case of whistleblowing, should be avoided. In any case, UniCredit Factoring will process these data only for purposes **strictly connected and instrumental to verify the authenticity of the irregularities'** reports or in order to fulfill specific **legal obligations** (connected to the whistleblowing purposes).

4. RECIPIENTS OR RECIPIENTS' CATEGORIES OF PERSONAL DATA

Internal access to the personal data processed as part of the investigation of the allegations shall be granted strictly on a need to know basis, that is subject to the necessity to have access. In particular, the personal data could be communicated to natural persons - appointed ad persons authorized to process personal data - with regard to the data necessary for the performance of the duties assigned to him, belonging to the following categories: employees or seconded by it, temporary employees, interns belonging to the following departments: Network Investigation, Support & Advice s, Anti Bribery & Corruption, LD 231/01 Whistleblowing and Conflict of interest Advisory, Internal Audit, People & Culture, Anti-Money Laundering, Legal, etc.

Your data can be communicated to those subjects to whom this communication shall be carried out in compliance with an obligation established by law, by a regulation or by EU legislation, if this is required, for example, by any subsequent criminal law proceedings or if the whistleblower maliciously makes a false statement.

5. DATA RETENTION PERIOD AND RIGHT TO ERASURE

The processing of personal data involves the use of manual, IT and ICT instruments with rationale closely connected with the purposes defined above and, in any case, in such a way as to guarantee the security and confidentiality of the data

6. DATA SUBJECT RIGHTS

GDPR grants and assures specific rights, including the right **to know** what data concerning you (are held by UniCredit for whistleblowing procedure, as well as how they are used, and the right to obtain, under certain conditions, the erasure, as well as the update, the rectification or, if interested, the data integration.

The rights of the data subject (in particular, the wrongdoer) may be limited pursuant to and for the purposes of Leg. D. 2003/196, art. 2-undecies, first par. lett. f) as integrated by Leg. D. 2018/101, and in compliance with EU Regulation 2016/679, art. 23, if from the rights exercise above indicated could arise a real and effective prejudice to the confidentiality of the whistleblower's identity.

The assessment on the necessity for data subject rights' limitation rests with the Controller whit the relevant functions in the matter. In this case, the Controller must provide to the data subject a reasoned communication, without delay, of rejection/delay/limitation/exclusion of the above indicated request to UniCredit – Public rights' exercise, without any prejudice to the provisions of art. 2-undecies par. 3 Leg. D. 2003/196 as integrated by Leg. D. 2018/101.

When access granted to the personal information of any concerned individual, the personal information of third parties such as informants, whistleblowers or witnesses shall be removed from the documents, except in exceptional circumstances (if the whistleblowers authorizes such disclosure, if this is required by any subsequent criminal proceedings or if the whistleblower maliciously makes a false statement).

7. DATA RETENTION PERIOD AND RIGHT TO ERASURE

UniCredit Factoring processes and stores the personal data for a period of time not exceeding that necessary to achieve the purposes for which they are collected or subsequently processed.

Retention of internal and external reports and related documentation will be kept for as long as necessary for their determination and, in any case, for not more than **five yea**rs from the date of the communication of the final outcome of the reporting procedure.

At the end of the applicable retention period , personal data related to the data subjects **will be erased or stored in a form which does not permits the data subjects' identification** (e.g. irreversible anonymization), unless the further processing is necessary for one or more of the following purposes: i) **for resolution of pre-litigation and/or litigation** started before the expiration of the retention period; ii) to follow up with **investigations/inspections by internal control functions and/or external authorities**, started before the

expiration of the retention period; iii) to follow up with requests from **the Italian and/or foreign public authorities** received/notified to UniCredit S.p.A. before the expiration of the retention period.

In case of application of one or more of the aforesaid hypotheses of interruption of personal data irreversible cancellation/anonymization process, it remains the Controller's right to limit access to the whistleblower's identifying data in accordance with and for the effects referred to in art. 2-undecies, first par. lett. f) Leg. D. 2003/196, as integrated by Leg. D. 2018/101.

8. PROCEDURE TO EXERCISE THE RIGHTS

To exercise the rights described in the paragraph 6, you can contact: **UniCredit Factoring I - UCF Whistleblowing <a3ucwhistleblowing.ucfactoring.it@unicreditgroup.eu>**.

The deadline for the reply is **one (1) month**, that may be extended by two (2) further months in cases of particular complexity; in these cases, UniCredit informs you about such extension within one (1) month of receipt of the request.

The exercise of rights is, in principle, free of charge.

It should be noted that the rights stated in Articles 15 to 22 of the GDPR can be exercised within the limits of Article 2-undecies of the Privacy Code.

9. COMPLAINT OR REPORTING TO THE "GARANTE PER LA PROTEZIONE DEI DATI PERSONALI"

UniCredit Factoring informs you that you have the right to lodge a complaint with, or make a report to the Garante per la Protezione dei Dati Personali, or else to appeal to the Judicial Authority. The contacts of the Garante per la Protezione dei Dati Personali can be consulted on the website http://www.garanteprivacy.it.