

LEFAY RESORTS

P19

WHISTLEBLOWING MANAGEMENT PROCEDURE AND PROTECTING THE WHISTLEBLOWER

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INDEX

1.	PURPOSE OF THE PROCEDURE AND REGULATORY CONTEXT.....	3
2.	DEFINITIONS	3
3.	OBJECTIVE SCOPE	5
4.	INTERNAL REPORTING CHANNEL.....	6
5.	RECIPIENT OF THE INTERNAL REPORTING CHANNEL.....	8
6.	INTERNAL REPORTING MANAGEMENT	8
6.1.	Preliminary verification of the Report.....	8
6.2.	Management of Reporting.....	9
6.3.	Internal investigation activities	9
6.4.	Closing the Report.....	10
6.5.	Communication of results and reporting.....	10
7.	PROTECTION MEASURES.....	11
7.1.	Protection measures for the protection of the	11
7.2.	Conditions for the application of protection measures	12
8.	CONFIDENTIALITY OBLIGATIONS CONCERNING THE IDENTITY OF THE REPORTING PERSON	13
9.	DATA PROTECTION	14
10.	SANCTIONS	15
11.	EXTERNAL REPORTING CHANNEL.....	15
12.	INFORMATION AND TRAINING	16

1. PURPOSE OF THE PROCEDURE AND REGULATORY CONTEXT

This procedure applies to the Lefay Companies: Lefay Resorts Srl and Lefay Resort Dolomiti Srl ("the **Companies**") and is aimed at implementing and regulating a system of whistleblowing within the scope of the activity carried out by the Companies. In particular, the procedure implements the provisions of Legislative Decree 10 March 2023, no. 24 (the "**Whistleblowing Decree**") of "*implementation of 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 on provisions concerning the protection of persons who report breaches of national regulatory provisions*", which regulates the protection of persons who report breaches of national or European Union regulatory provisions that harm the public interest or the integrity of the public administration or private entity, of which they have become aware in a public or private employment context.

The procedure also complies with data protection legislation and, in particular, with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data.

2. DEFINITIONS

"ANAC"	the National Anti-Corruption Authority
"Privacy Code"	the Legislative Decree No. 196 of 30 June 2003 ('Personal Data Protection Code'), which provides for the protection of persons and other subjects with regard to the processing of personal data
"Whistleblowing Decree"	the Legislative Decree No 24 of 10 March 2023
"Recipient"	indicates the Reporting Manager as identified below
"Directive"	the Directive (EU) 2019/1937
"GDPR"	the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and

on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation)

“Facilitator”	a natural person who assists the Reporting person in the process of making the Report, operating within the same work context and whose assistance must be kept confidential (these are persons who, having a qualified connection with the Reporting person, could suffer retaliation on account of this connection)
“Reporting manager”	indicates T2 Advisory S.r.l., recipient and manager of Whistleblowing Reports, with an obligation of confidentiality on the information acquired
“Procedure” or “Whistleblowing Procedure”	this procedure approved on 27 February 2024
“Reporting person”	those who have the power to make a Whistleblowing Report pursuant to the Whistleblowing Decree and, in general, this Procedure, including employees, collaborators, shareholders, persons exercising (even on a de facto basis) functions of administration, management, control, supervision or representation of the Companies and other third parties interacting with the Companies (including suppliers, consultants, intermediaries, etc.) as well as interns or probationary workers, job applicants and former employees
“Whistleblowing Report” or “Report”	the report submitted by a Reporting person in accordance with the principles and rules set out in this Procedure
“Anonymous Whistleblowing Report” or “Anonymous Report”	Reports not containing details that allow or could allow, even indirectly, the identification of the Reporting person

“Involved Person”	the natural or legal person named in the Report as the person to whom the Breach is attributed or as a person otherwise implicated in the reported Breach
“Connected Persons”	the persons for whom the same protections that the Whistleblowing Decree provides for the Reporting person are applicable and who are: (i) the facilitators; (ii) persons in the same work context as the Reporting person and who are linked to him/her by a stable affective or kinship link up to the fourth degree; (iii) work colleagues of the Reporting person who work in the same work context and who have a habitual and current relationship with the Whistleblower; (iv) entities owned by the Reporting person or for whom the Whistleblowing person works or entities operating in the same work context.

3. OBJECTIVE SCOPE

The violations that can be reported pursuant to the Whistleblowing Decree must relate to conduct, acts or omissions that harm the public interest or the integrity of the public administration or the private entity (i.e. the Companies), of which the Reporting person has become aware in the context of the Companies’ work, and which consist in:

1. offences falling within the scope of application of European Union or national acts (as referred to in the Whistleblowing Decree) relating to the following areas:
 - a) public procurement;
 - b) financial services, products and markets and the prevention of money laundering and terrorist financing;
 - c) product safety and conformity; transport safety;
 - d) environmental protection;
 - e) radiation protection and nuclear safety;
 - f) food and feed safety and animal health and welfare;
 - g) public health;
 - h) consumer protection;

- i) protection of privacy and personal data and security of networks and information systems;
2. acts or omissions detrimental to the financial interests of the European Union, as referred to in the Whistleblowing Decree;
3. acts or omissions concerning the internal market, including violations of EU competition and State aid rules, as well as violations concerning the internal market related to acts in breach of corporate tax rules or mechanisms whose purpose is to obtain a tax advantage that frustrates the object or purpose of the applicable corporate tax law, as referred to in the Whistleblowing Decree;
4. acts or conduct that frustrate the object or purpose of the provisions of Union acts in the areas indicated in points (2), (3) and (4).

The offences referred to in this Section are also referred to hereinafter as “Violations”.

4. INTERNAL REPORTING CHANNEL

In compliance with the provisions of the Whistleblowing Decree, Lefay Group has activated the following internal reporting channel which, by means of a specific platform, allows reports to be sent electronically in written and oral form and guarantees - also by means of encryption tools - the confidentiality of the identity of the Reporting person, of the Person Involved and of the person mentioned in the Report, as well as the content of the Report and of the relevant documentation:

lefoy.openblow.it

The platform is accessible through the Lefay Resorts website, via the special sections

Lefay Resorts Srl: <https://lagodigarda.lefoyresorts.com/it/note-legali>

Lefay Resort Dolomiti Srl: <https://dolomiti.lefoyresorts.com/it/note-legali>

Once the process of entering a report has been activated, it will be necessary to select from the list of companies belonging to the Lefay Resorts group, the one to which the report intends to refer.

It is also possible to send an oral report via a voice messaging system accessible at the following numbers:

Lefay Resorts Srl: 0039 030 839 0008

Lefay Resort Dolomiti Srl: 0039 030 839 0009

Anonymous Whistleblowing Reports are allowed.

Through the platform, the Reporting person also has the possibility of requesting a direct meeting with the Reporting Manager, set within a reasonable deadline.

In this regard, it should be noted that the platform allows the Reporting person to stay in contact with the Reporting Manager during the management of the Anonymous Report, being able to provide clarifications and/or documentary additions through a messaging system that guarantees anonymity.

Nonetheless, it should be borne in mind that sending an Anonymous Whistleblowing Report could make the investigation of the reported conduct and the dialogue between the Reporting Manager and the Reporting person more difficult, and thus undermine the usefulness of the Report itself.

Once the report has been sent, a 16-digit code is issued to the Reporting person, which is needed to access his report again in order to check the outcome or any communications or requests for additions by the Reporting Manager. The identification data of the Reporting person, the data of the report, the content of the report and any attached documents are stored on the platform and are accessible only by the Reporting Manager.

Alternatively, reports may also be sent in paper form by ordinary mail to the address Via delle Grazie no. 3, 25122 Brescia.

As a rule, the report must contain the following elements:

- the identity of the person making the report;
- the clear and complete description of the facts being reported;
- the circumstances of time and place in which the facts were committed;
- the particulars or other elements enabling the identification of the persons who have committed the reported facts;
- an indication of any other persons who may be able to report on the reported facts;
- an indication of any documents that may confirm the validity of such facts;
- any other information that may provide useful feedback on the existence of the facts reported.

5. RECIPIENT OF THE INTERNAL REPORTING CHANNEL

Lefay Group has identified the company T2 Advisory S.r.l., with registered office in Brescia, Via delle Grazie, 3, as Reporting Manager of the Reports.

For any Reports of facts in which the Reporting Manager is directly involved, the attributions, competences and powers of the Reporting Manager are transferred to the Chairman of the Board of Directors, who handles such Reports in compliance with this Procedure.

6. INTERNAL REPORTING MANAGEMENT

6.1. Preliminary verification of the Report

Upon receipt of the Report, the Reporting Manager:

- a) issues the Reporting person with an acknowledgement of receipt of the Report within seven days from the date of receipt;
- b) performs a preliminary analysis of the Report's contents, if deemed appropriate by the same, also with the support of specialized external consultants, in order to assess its relevance in relation to the scope of application of the Whistleblowing Decree and, in general, of the Procedure
- c) dismiss the Report if it considers that the Report is not admissible by reason of the provisions of the Whistleblowing Decree and of this Procedure, such as:
 - o manifest groundlessness due to the absence of factual elements ascribable to the typified Violations;
 - o ascertained generic content of the report of offence such as not to allow comprehension of the facts, or report of offence accompanied by inappropriate or irrelevant documentation such as not to allow comprehension of the content of the report itself;
 - o production only of documentation in the absence of a report of unlawful conduct.

In such a case, the Reporting Manager, pursuant to the provisions of the Whistleblowing Decree and Paragraph 6.2. of this Procedure, shall take care to justify in writing to the Reporting person the reasons for the dismissal;

- d) where the Report is not filed, take charge of the management of the Report.

As provided for in Article 4 of the Whistleblowing Decree, a Report submitted to a person other than the Reporting Manager must be forwarded immediately (within seven days) to the Reporting Manager, with contemporaneous notice to the Reporting person.

6.2. Management of Reporting

The handling of the Report is carried out in accordance with the provisions of this Procedure. In managing the Report, the Reporting Manager performs the following activities:

- a) maintain interlocutions with the Reporting person and - if necessary - request additions from the latter; in this respect, the platform allows the exchange of information and/or documents;
- b) provides diligent follow-up to the Reports received;
- c) provides feedback to the Report within three months from the date of the acknowledgement of receipt of the Report or, in the absence of such an acknowledgement, within three months from the expiry of the seven days from the submission of the Report.

The Reporting Manager may request the support of internal functions or specialized external consultants, subject to the confidentiality requirements of the Whistleblowing Decree and this Procedure.

The Reporting Manager also has the right to request clarifications and/or additions from the Involved Person during the course of the handling of the Report.

This is without prejudice, moreover, to the possibility for the Reporting person to provide further information in the event that the matter reported is continued, interrupted or even aggravated.

Reports (and related documentation) are retained through the platform for as long as necessary to process them and, in any case, for no longer than five years from the date of the communication of the final outcome of the reporting process.

6.3. Internal investigation activities

The Reporting Manager, in order to assess a Report, may carry out the necessary internal investigations either directly or by appointing - subject to the obligation of confidentiality - a person internal or external to the reported Company.

The Reporting Manager collects the information and/or documents via the platform, which allows the creation of a dossier for each case, in which the information and documentation related to each Report is stored.

6.4. Closing the Report

The evidence gathered during internal investigations is analysed to understand the context of the Whistleblowing, to determine whether a relevant Breach under this Procedure and/or the Whistleblowing Decree has actually occurred, and to identify disciplinary measures, appropriate measures to remedy the situation that has arisen and/or to prevent such a situation from recurring in the future.

Furthermore, where a Breach has been established, the Reporting Manager may:

- a) initiate disciplinary proceedings against the Whistleblower, in compliance with any applicable legislation and collective bargaining agreements;
- b) assess - also in cooperation with the other competent corporate functions - the opportunity to initiate disciplinary proceedings against the Reporting person, in the event of Reports in respect of which bad faith and/or merely defamatory intent are ascertained, also confirmed by the groundlessness of the Report itself
- c) agree with the Board of Statutory Auditors concerned by particular Reports - concerning matters relating to complaints pursuant to Article 2408 of the Italian Civil Code (shareholder complaints) - any initiatives to be taken before closing the Report itself
- d) agree with the corporate function concerned by the Breach, on a possible action plan necessary for the removal of the control weaknesses detected, also ensuring the monitoring of its implementation.

6.5. Communication of results and reporting

The results of the management activities of the Reports received and not filed, including the checks carried out and any sanctioning measures taken, are summarised in a report, sent annually by the Reporting Manager to the Companies' Board of Directors.

The above reporting is carried out in compliance with the confidentiality obligations set out in the Whistleblowing Decree.

7. PROTECTION MEASURES

7.1. Protection measures for the protection of the Reporting person

Whistleblowing Reports must be made in good faith, without prejudice to the criminal liability of the Reporting person in the event that a Report constitutes an offence of slander or defamation or other offence, and without prejudice to the cases of non-punishability under the Whistleblowing Decree referred to in this Section 7.1. and Section 7.2..

The Whistleblowing Decree provides for the following protection measures against Reporting person and Connected Persons:

- prohibition of retaliation on account of a Whistleblowing;
- support measures, which consist of information, assistance, advice free of charge from third-sector entities indicated in a list available on the ANAC website on how to report and on the regulatory provisions in favour of the Reporting person and of the Involved Person;
- protection against retaliation, which includes:
 - o the possibility of communicating to the ANAC any retaliation one believes to have suffered as a result of a Report;
 - o provision for the nullity of acts taken in breach of the prohibition of retaliation, which can also be enforced before the courts;
- limitations of liability in the event of the disclosure (or dissemination) of breaches covered by the obligation of secrecy, except in the case of classified information, professional and medical secrecy and secrecy of the deliberations of judicial bodies, for which the application of the relevant legislation remains unaffected, or relating to the protection of copyright or the protection of personal data, or information on breaches that offend the reputation of the person involved or reported, if
 - o at the time of disclosure (or dissemination) there were reasonable grounds to believe that disclosure was necessary to disclose the Breach; and
 - o the conditions set out in paragraph 7.2 below were met;
- limitations of liability, unless the act constitutes a criminal offence, for the acquisition of or access to information on Breaches;
- sanctions (as set out in this Procedure, in Paragraph 10).

7.2. Conditions for the application of protection measures

The protection measures listed above apply to the Reporting person and Connected Persons provided that:

1. at the time of the Report, the author of the Report had reasonable grounds to believe that the information on the Violations reported or denounced was true and fell within the scope of the Whistleblowing Decree (as referred to in Paragraph 3 of this Procedure);
2. the Report was made in accordance with the provisions of the Whistleblowing Decree.

Protection measures also apply in the case of Anonymous Reporting, if the Reporting person is subsequently identified and retaliated against.

In particular, retaliation refers to the cases provided for in Article 17 of the Whistleblowing Decree, including the following cases, which are set out below by way of example but not limited to:

- a) dismissal, suspension or equivalent measures;
- b) downgrading or non-promotion;
- c) change of (detrimental) duties, change of place of work, reduction of salary, change of working hours;
- d) suspension of training or any restriction on access to it;
- e) negative merit notes or references;
- f) the adoption of disciplinary measures or any other sanction, including a fine;
- g) coercion, intimidation, harassment or ostracism;
- h) discrimination or otherwise unfavourable treatment;
- i) failure to convert a fixed-term employment contract into an employment contract of indefinite duration, where the employee had a legitimate expectation of such conversion
- j) the non-renewal or early termination of a fixed-term employment contract;
- k) damage, including to the person's reputation, particularly on social media, or economic or financial detriment;
- l) improper listing on the basis of a formal or informal sector or industry agreement which may result in the person being unable to find future employment in the relevant sector or industry
- m) the early termination or cancellation of a contract for the supply of goods or services;
- n) the cancellation of a licence or permit;
- o) a request for psychiatric or medical examinations.

Communications of retaliation suffered, or alleged to have been suffered, must be transmitted exclusively to ANAC. In order to acquire investigative elements that are indispensable for ascertaining the retaliation, ANAC may avail itself of the collaboration of the National Labour Inspectorate, without prejudice to ANAC's exclusive competence as regards the assessment of the elements acquired and the sanctions to be imposed.

It is important, therefore, that those who have suffered retaliation do not transmit the communication to parties other than ANAC, so as not to nullify the protections that Legislative Decree no. 24/2023 guarantees, first and foremost, confidentiality. Where, by mistake, one of the Companies is the recipient of a communication of retaliation, it is required to guarantee the confidentiality of the identity of the person who sent it and to transmit it to ANAC, at the same time giving notice of such transmission to the person who made the communication. Persons who have suffered retaliation are entitled to be reinstated in their jobs.

8. CONFIDENTIALITY OBLIGATIONS CONCERNING THE IDENTITY OF THE REPORTING PERSON

Without prejudice to the further confidentiality obligations provided for by the Whistleblowing Decree, it is recalled that the identity of the Reporting person and any other information from which such identity may be directly or indirectly inferred may not be disclosed, without the express consent of the Reporting person, to persons other than those competent to receive or follow up Whistleblowing Reports expressly authorised to process such data pursuant to Articles 29 and 32(4) of the GDPR and Article 2-quaterdecies of the Privacy Code.

With reference to the following specific confidentiality obligations, it should also be considered that:

- in criminal proceedings, the identity of the Reporting person is covered by secrecy in the manner and within the limits set out in Article 329 of the Code of Criminal Procedure;
- in disciplinary proceedings:
 - a) the identity of the Reporting person cannot be disclosed, if the accusation of the disciplinary charge is based on investigations that are separate and additional to the Whistleblowing, even if consequent to the Whistleblowing;
 - b) if the disciplinary charge is based, in whole or in part, on the Report, and knowledge of the identity of the Reporting person is essential for the accused's defence, the Report can be used for the purposes of the disciplinary proceedings only if the Reporting

person expressly consents to the disclosure of his/her identity. In such a case, the Reporting person is informed in writing of the reasons for the disclosure of the confidential data.

9. DATA PROTECTION

The processing of personal data in the management of the internal reporting channel and of reports received must be carried out in accordance with the GDPR and the Privacy Code.

Lefay Group has defined its own model for receiving and managing internal reports, identifying technical and organisational measures suitable for guaranteeing a level of security appropriate to the specific risks arising from the processing operations performed, on the basis of a data protection impact assessment, pursuant to Article 35 of the GDPR.

The relationship with external suppliers that process personal data on behalf of Lefay Group is regulated through a data processing agreement, pursuant to Article 28 of the GDPR, which defines the duration, nature and purpose of the processing, the type of personal data and the categories of data subjects, the obligations and rights of the data controller, in accordance with Article 28 of the GDPR.

The persons competent to receive or follow up Reports pursuant to this Procedure must be authorised to process personal data relating to Reports pursuant to Articles 29 and 32 of the GDPR and Article 2-quaterdecies of the Privacy Code.

Whistleblowers and Covered Persons must be provided with appropriate information pursuant to Articles 13 and 14 of the GDPR.

With reference to the exercise of the data subject's rights and freedoms, in the event that the data subject is the Involved Person, the rights under Articles 15 to 22 of the GDPR may not be exercised (by request to the Data Controller or by complaint pursuant to Article 77 of the GDPR) if this would actually and concretely prejudice the confidentiality of the identity of the Reporting person (see Article 2-undecies of the Privacy Code and Article 23 of the GDPR) and/or the pursuit of the objectives of compliance with the legislation on reporting unlawful conduct.

The exercise of the rights by the Involved Person (including the right of access) may therefore be exercised to the extent permitted by the applicable law and following an analysis by the

competent bodies, in order to reconcile the need to protect the rights of individuals with the need to combat and prevent violations of the rules of good corporate governance or of the applicable regulations.

Personal data that are clearly not useful for processing a specific Report are not collected or, if collected, must be deleted immediately.

10. SANCTIONS

Monetary sanctions (from EUR 10,000 to EUR 50,000) are imposed on anyone guilty of any of the following conducts:

- retaliation against the Reporting person or Connected Persons in connection with Reports;
- obstructing or attempting to obstruct the making of a Whistleblowing Report;
- breach of the confidentiality obligations set out in the Whistleblowing Procedure and Decree;
- failure to establish Whistleblowing channels in accordance with the requirements of the Whistleblowing Decree;
- failure to adopt a procedure for making and handling Reports or failure to comply with the Whistleblowing Decree;
- failure to verify and analyse the Reports received.

In addition, a disciplinary sanction may be imposed on the Reporting person when (apart from the specific cases provided for by the Whistleblowing Decree) he/she is found to be: (i) criminally liable, even in a court of first instance, for offences of defamation or slander or, in any case, for the same offences committed with the report to the judicial authority; or (ii) civilly liable, for the same offence, in cases of wilful misconduct or gross negligence. In this case, provision is also made for the application of fines ranging from EUR 500 to EUR 2,500 by the ANAC.

11. EXTERNAL REPORTING CHANNEL

The Reporting person may make an external report through the channel established and accessible on the ANAC website of the following violations:

1. offences falling within the scope of European Union or national acts relating to the following areas: public procurement; financial services, products and markets and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; privacy and personal data protection and the security of networks and information systems;
2. acts or omissions affecting the financial interests of the European Union;
3. acts or omissions affecting the internal market, including violations of Union competition and state aid rules as well as violations affecting the internal market related to acts in breach of corporate tax rules or mechanisms whose purpose is to obtain a tax advantage that frustrates the object or purpose of the applicable corporate tax law
4. acts or conduct that frustrate the object or purpose of the provisions of Union acts in the areas mentioned in the previous numbers.

It should be noted that recourse to the external reporting channel set up at the ANAC can only take place if:

- the internal reporting channel indicated in the Procedure is not active;
- the Reporting person has already made a Report to the channel indicated in the Procedure and the same has not been followed up;
- the Reporting person has well-founded reasons to believe that, if he/she made an internal Report through the channel indicated in this Procedure, the same would not be followed up or the Report could lead to the risk of retaliation;
- the Reporting person has reasonable grounds to believe that the Breach to be reported may constitute an imminent or obvious danger to the public interest.

For the use of this external reporting channel or the use of public disclosure, please refer to the guidelines and the official ANAC website.

12. INFORMATION AND TRAINING

Information on this Procedure is made accessible and available to all, made easily visible in the workplace and also published in a dedicated section of the corporate website.

Information on the Procedure is also made available when hiring an employee.

Pursuant to Regulation (EU) 2016/679 «GDPR» and Italian Legislative Decree No. 196/2003 of the «Personal Data Protection Code» or «Privacy Code», Lefay Resorts S.r.l. provides the following information regarding the processing of personal data of individuals who will make whistleblowing reports through this platform.

DATA CONTROLLER

The data controller is Lefay Resorts S.r.l. (VAT ID No.: 02786260980), having its registered office and trading office at Via Santigaro 4 in S. Felice del Benaco (BS), ITALY, and a trading office at Via Feltrinelli 136 in Gargnano (BS), ITALY. The Data Controller can be contacted by writing to the following email address: hr.corporate@lefoyresorts.com, or by calling at +39 0365/441711.

PURPOSES OF PERSONAL DATA PROCESSING

The personal data provided or obtained from any contacts will be used solely for the purpose of managing whistleblowing reports made by users.

LOCATION OF DATA PROCESSING

Personal data will be processed in Italy and within spaces within the EU. There is no personal data processing outside the European Union. No data will be disclosed or disseminated communicated to unspecified third parties.

DATA PROCESSED

As detailed in the whistleblowing policy, this platform operates primarily through anonymous reporting. Any personal data voluntarily provided by the reporting person will be processed with a dissociation procedure and will be limited to the minimum necessary to analyse of the report received. Therefore, the following data may be processed: contact details (email) and, if necessary, name and surname.

Such data, if provided, are necessary for managing the whistleblowing report. Failure to provide them may result in the inability to manage the report in depth and effectively.

LEGAL BASIS FOR THE PROCESSING

The legal basis for processing personal data is derived from the obligation arising from the provisions of Italian Leg. Decree 24/2023 implementing 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 on provisions concerning the protection of persons who report breaches of national regulatory provisions».

STORAGE PERIODS

The personal data provided will be deleted within a timeframe compatible with the management of whistleblowing reports, or within additional terms if required by law.

ENTITIES WITH WHICH DATA MAY BE SHARED

Personal data may be processed by the Reporting Manager specifically appointed by Lefay Resorts S.r.l. (T2 Advisory S.r.l., a company having its registered office at Viale delle Grazie 3, in Brescia) and by any collaborators thereof acting as data processors and/or persons in charge of processing pursuant to Article 28 of Regulation. (EU) 2016/679, dependant on the content of the report, the data may also be processed by independent data controllers (such as public security authorities) should that be necessary as required by law.

DATA PROCESSING METHODS

For the purposes specified, personal data may be processed using electronic, magnetic, and/or physical means. It should be noted that there is no fully automated processing of data. Specific security measures are observed to prevent loss of, unlawful or incorrect use of, and/or unauthorised access to data.

RIGHTS OF DATA SUBJECTS

Subject to certain specificities provided by law, each reporting person has the right to exercise what is provided for in articles 7, 8, 9, and 10 of the Privacy Code (Italian Leg. Decree 196/03) and articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR, particularly to request:

- Access to their personal data;
- A copy of the personal data they have provided (so-called portability);
- The rectification of personal data;
- The erasure of data no longer necessary for the management of the Whistleblowing procedure;
- Objection to processing where provided for by applicable law;
- That consent to the processing of data be revoked if the management has been based on specific consent (procedure applicable only if necessary, following the investigation activities related to the report);
- The restriction of the processing methods of the reporting person's personal data, within the limits provided for by law.

The exercise of the above rights is subject to some exceptions aimed at safeguarding public interest (prevention or identification of crimes) and/or interests related to trade secrets.

The exercise of the above rights will be subject to specific verification by the Data Controller regarding the legitimacy of the reporting person's action, and the reporting person will receive adequate feedback within a maximum period of twenty days.

For any clarification that may be needed and in order to exercise the above rights, the reporting person may contact the Data Controller: Lefay Resorts S.r.l. (VAT ID No.: 02786260980) at the registered office and trading office located at Via Santigaro 4, in S. Felice del Benaco (BS) ITALY, by writing to the following email address: hr.corporate@lefyresorts.com or by calling at +39 0365/441711.

Complaints can be also forwarded to the *Garante per la Protezione dei Dati Personali* (Italian Data Protection Authority) located at Piazza di Monte Citorio no. 121 - 00186 ROMA - Email: garante@gpdp.it - Certified email address: protocollo@pec.gpdp.it.

Lefay Resorts S.r.l.

*This policy statement complements and supplements elements already known to the data subject.