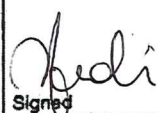


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Signatures			 Signed	 Signed	 Signed
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01	30/10/2023	First issue	Studio Mascitelli	HR A. Ornati	BoD
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ORGANISATION, MANAGEMENT AND CONTROL MODEL

pursuant to Legislative Decree no. 231 of 8 June 2001 and subsequent amendments and additions

LIGHTHOUSE STA srl

**GENERAL PART
ANNEX G
WHISTLEBLOWING**

Approved by resolution of the Board of Directors on 20 February 2026

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1. Regulatory source and purpose

This protocol is adopted by the Company and has the purpose of implementing and governing a system of reports of irregularities within the scope of the activity carried out by the Company, with simultaneous protection of the persons who report violations of national or European Union regulatory provisions that harm

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the public interest or the integrity of the public administration or of the private entity, of which they have become aware in the work context.

The procedure transposes the provisions of Legislative Decree no. 24 of 10 March 2023 (the **“Whistleblowing Decree”**) *“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 laying down provisions regarding the protection of persons who report breaches of national regulatory provisions”*.

The reporting system regulated herein represents the necessary implementation for the purposes of Legislative Decree no. 231 of 8 June 2001 which, as regards internal reports, the applicable penalties and the prohibition of retaliation in relation thereto, refers to the aforesaid Decree.

The procedure also complies with the legislation on the protection of personal data 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 natural persons with regard to the processing of personal data.

Through the report, the whistleblower contributes to bringing to light situations of degeneration and malfunctioning of the internal system of the individual corporate management and, moreover, participates in a process of prevention of risks and situations prejudicial to the Company and, indirectly, also to the collective public interest.

The purpose of these regulations is therefore also to instil “an “ethical and social conscience” in the workplace, which encourages the individual to take action to report to the authority or even to their own employer any unlawful acts of which they have become aware in the performance of their work duties

The procedure further aims to remove the possible factors that may discourage the use of reporting, such as doubts and uncertainties regarding:

- the procedure to be followed;
- fears of retaliation or discrimination by the company management or in any case by hierarchical superiors, etc.
- the possible disclosure of official, professional, scientific or industrial secrets.

From this perspective, the aim pursued by this procedure is to provide the reporting person with clear operational indications regarding the subject matter, contents, recipients and methods of transmission of reports, as well as the forms of protection offered in our legal system.

This Procedure, therefore, has been prepared to govern the management of the report of irregularities, from the moment the reporting person decides to submit it through to subsequent developments, in accordance with the provisions of Legislative Decree 24/2023.

2. Definitions

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“ANAC”	the National Anti-Corruption Authority
“Privacy Code”	Legislative Decree no. 196 of 30 June 2003 (“Personal Data Protection Code”) which provides for the protection of persons and other subjects with respect to the processing of personal data
“Decree 231”	Legislative Decree no. 231 of 8 June 2001 and subsequent amendments and additions
“Whistleblowing Decree”	Legislative Decree no. 24 of 10 March 2023
“Recipient”	indicates a subject identified by the Company, recipient and manager of the Whistleblowing Reports, with the obligation of confidentiality on the information acquired (for the company this is the SB)
“Directive”	Directive (EU) 2019/1937
“GDPR”	Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data, as well as on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
“Model 231”	the organisation, management and control model provided for by Decree 231, adopted by the Company
“Supervisory Body or ‘SB’”	the supervisory body established pursuant to Decree 231
“Procedure” or “Whistleblowing Procedure”	this procedure approved by the administrative body
“Reporting person(s)”	those who have the right to make a Whistleblowing Report pursuant to the legislation referred to in Legislative Decree 24/2023 and, in general, to this Procedure, including: employees, collaborators, shareholders, persons who exercise (even merely de facto) functions of administration, management, control, supervision or representation of the Company and other third parties who interact with the Company (including suppliers, consultants, intermediaries, etc.) as well as interns or workers on probation, candidates for employment relationships and former employees.
“Whistleblowing Report” or “Report”	the report submitted by a Reporting person pursuant to the principles and rules set out in this Procedure

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“Anonymous Whistleblowing Report” or “Anonymous Report”	Reports not containing details that allow or could allow, even indirectly, the identification of the Reporting person
“Person Involved”	the natural or legal person mentioned in the Report as the person to whom the Violation is attributed or as a person in any case implicated in the reported Violation
“Linked Subjects”	the subjects to whom the same protections apply that the Whistleblowing Decree provides for the Reporting person and who are: (i) the facilitators; (ii) persons in the same work context as the Reporting person and who are connected to them by a stable emotional bond or by kinship 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 ongoing relationship with the Reporting person; (iv) entities owned by the Reporting person or for which they work or entities that operate in the same work context
“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 subjects who, having a qualified connection with the Reporting person, could suffer retaliation by reason of said connection).

3. Recipients

This Procedure is intended for all the activities managed by the Company and applies (art. 3, Legislative Decree 24/2023):

- employees (including fixed-term workers, part-time workers, agency workers and apprentices, referred to in Legislative Decree 81/2015, and workers with occasional work contracts);
- self-employed workers and holders of coordinated and continuous collaboration relationships pursuant to art. 409 of the Code of Civil Procedure, as well as holders of collaboration relationships pursuant to art. 2 of Legislative Decree 81/2015;
- self-employed workers who provide goods or services (works);
- freelance professionals and consultants;
- volunteers and trainees, including unpaid ones;
- shareholders and persons with functions of administration, management, control, supervision or representation, even if they perform such functions on a merely de facto basis.

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4. The subject matter of reports

The violations that can be reported pursuant to the Whistleblowing Decree must concern conduct, acts or omissions that harm the public interest or the integrity of the Company, of which the Reporting person has become aware in the work context, and which consist of:

- administrative, accounting, civil or criminal offences;
- unlawful conduct relevant pursuant to Legislative Decree 231/2001, or violations of the organisation and management models provided for therein;
- offences that fall within the scope of application of European Union or national acts relating to the following sectors: public procurement; financial services, products and markets and 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; protection of privacy and protection of personal data and security of networks and information systems;
- acts or omissions that harm the financial interests of the Union;
- acts or omissions concerning the internal market;
- acts or conduct that frustrate the object or purpose of the provisions of the Union acts.

By express legislative provision, the provisions on whistleblowing do not apply (art. 1, Legislative Decree 24/2023):

a) to disputes, claims or requests linked to a personal interest of the reporting person or of the person who has lodged a complaint with the judicial or accounting authority that relate exclusively to their own individual employment or public employment relationships, or pertaining to their own employment or public employment relationships with hierarchically superior figures;

b) to reports of violations where already governed on a mandatory basis by the Union or national acts indicated in part II of the annex to this decree or by the national ones that implement the European Union acts indicated in part II of the annex to Directive (EU) 2019/1937, even if not indicated in part II of the annex to this decree;

c) to reports of violations regarding national security, as well as procurement relating to defence or national security aspects, unless such aspects fall within the relevant secondary law of the European Union.

5. Operating methods: Internal and external reporting channels and management of reports

Art. 4 of the Decree provides, in particular and for what is relevant here:

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- that the entity, having consulted the trade union representatives or organisations referred to in article 51 of Legislative Decree no. 81 of 2015, activates “its own reporting channels that guarantee, including through the use of encryption tools, the confidentiality of the identity of the reporting person, of the person involved and of the person in any case mentioned in the report, as well as of the content of the report and the relevant documentation”.
- that “the management of the reporting channel is entrusted to a person or to a dedicated autonomous internal office with personnel specifically trained for its management, or is entrusted to an external party, also autonomous and with specifically trained personnel”;
- that “reports are made in written form, including by electronic means, or in oral form, the latter through telephone lines or voice messaging systems or, at the request of the reporting person, by means of a direct meeting set within a reasonable time”

LightHouse STA has adopted the Organisation, Management and Control Model pursuant to Legislative Decree no. 231 of 8 June 2001. Within the framework of the Model, the Supervisory Body has activated and manages the channel (email address) dedicated to reports concerning violations of the Model.

This channel, already active, is managed exclusively by the Supervisory Body, with no possibility of control, in any case, by the Company; this ensures compliance with all the requirements set out in Legislative Decree 24/2023 as the main reporting channel, to which others indicated below are added but always entrusted to the SB.

5.1 Content of the report

Reports must be detailed, verifiable and complete with all the information useful for ascertaining the facts and identifying the subjects to whom the violations are to be attributed.

The Reporting person is responsible for the content of the Report. In particular, the Report must contain, at least:

- the personal details of the person making the Report, with an indication of the qualification or professional position. The possibility of submitting an anonymous report remains in any case (see below);
- a clear and complete description of the unlawful conduct that is the subject of the Report and of the manner in which it became known;
- the date and place where the fact occurred;
- the name and role (qualification, professional position or service in which the activity is carried out) that allow the identification of the subject(s) to whom responsibility for the reported facts is to be attributed;
- suitable supporting documentation or any documents aimed at verifying the soundness of the reported facts;
- any other information useful for verifying the reported facts.

A Report from which it is not possible to derive the identity of the Reporting person is considered anonymous.

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Anonymous Reporting is permitted although not recommended, as it limits the possibility of interaction with the Reporting person as well as of adequately verifying the soundness of the facts.

Anonymous reports, in any case, where detailed and capable of bringing to light facts and situations related to specific contexts, are treated as equivalent to ordinary reports, i.e. to informal reports or in any case those made outside the whistleblowing system (and therefore, as such, protected only by the general principles of labour law and not by the specific rules set out in Legislative Decree 24/2023).

It is recalled that confidentiality of the Reporting person’s data is always guaranteed, as well as the protection of the latter from any form of retaliation or discrimination.

5.2 Management of internal reporting channels

The management of the internal reporting channels is thus entrusted to the SB of LightHouse STA, which ensures the correct conduct of the procedure and which will carry out the following activities:

- within seven days of the date of receipt of the report, a specific acknowledgement of receipt will be issued;
- the final response must take place within three months of the date of the acknowledgement of receipt indicated above, without prejudice to the obligation to maintain communications with the reporting person and to request from the latter, if necessary, additional information.

5.3 Internal reporting channels

The whistleblower may submit their report:

1. by email to the address established and managed by the Supervisory Body: odvlighthousesta@gmail.com;
2. by drawing up a written report, to be delivered in a sealed envelope marked “CONFIDENTIAL”/“PERSONAL” by post or by hand: SB LightHouse STA srl c/o the registered office of the same company, indicating an address, or a mobile contact, in order to manage the report;
3. orally, by contacting the number 0586.880649, requesting a telephone appointment with the Supervisory Body of LightHouse STA Srl, lawyer Paolo Mascitelli.

5.4 External reporting

The external reporting channel is entrusted to ANAC which, with the entry into force of the legislative decree in question, may receive and must manage external reports also coming from subjects belonging to the private sector. These reports may, pursuant to art. 6, be made upon the occurrence of one of the following conditions:

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- in the absence of provision or activation of the internal reporting channel in the work context to which they belong, or where it does not comply with the provisions of art. 4;
- in the event that the report on the internal channel has remained without follow-up;
- in the event that the reporting person has reasonable grounds to believe that if they were to make an internal report, it would remain without follow-up, or that it could give rise to the risk of retaliation;
- in the event that the reporting person has reasonable grounds to believe that the violation may constitute an imminent danger to the public interest.

External reports, for which there is a similar guarantee of confidentiality, are submitted in written form, through a specific IT platform, or orally, through telephone lines, voice messaging systems or a meeting with the dedicated personnel (art. 7, paragraph 2).

It will be ANAC’s duty to communicate to the reporting subject the final outcome of the procedure, which may also consist of the filing of the report, a recommendation or an administrative penalty, or the transmission of the report to the competent authorities.

6. Confidentiality of the reporting person’s identity

The identity of the reporting person cannot be revealed, without their express consent, to persons other than those competent to receive or follow up on the reports, except in cases where liability of the reporting person can be established, ascertained also by a first-instance judgment, for the offences of calumny or defamation or in any case for offences committed through the complaint, or where their civil liability is established, on the same grounds, in cases of wilful misconduct or gross negligence.

The protection of confidentiality also extends to all the elements of the report from which the identification of the reporting person may be derived, even indirectly.

The identity of the persons involved (reported) and of the persons mentioned in the report is also protected, until the conclusion of the proceedings initiated by reason of the report, in compliance with the same guarantees ensured to the reporting person.

Where, in the context of the disciplinary proceedings resulting from the report, the charge is based, wholly or in part, on the report and knowledge of the reporting person’s identity is indispensable for the defence of the subject to whom the disciplinary charge has been made, the report may be used and the disciplinary proceedings may take place only with the consent of the reporting person to the disclosure of their own identity. To this end, it is for the Person Responsible for the disciplinary proceedings to assess whether the conditions exist as regards the indispensability, for the exercise of the defence by the subject to whom the disciplinary charge has been made, of knowledge of the reporting person’s identity.

In the context of criminal proceedings, the identity of the reporting person is covered by secrecy in the manner and within the limits provided for by art. 329 of the Code of Criminal Procedure.

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Violation of the obligation of confidentiality is a source of disciplinary liability.

The notice on the processing of personal data attached to the Whistleblowing procedure of Model 231 *under B* describes the method of processing the data relating to the report.

7. Measures to Protect the reporting person

The Decree provides the reporting person with protection from retaliation, support measures and limitation of liability. An employee who reports, under this Procedure, unlawful conduct of which they have become aware by reason of the employment relationship cannot for this reason be penalised, demoted, dismissed, transferred or subjected to another organisational measure having negative effects, direct or indirect, on working conditions. Reference is made in this regard to the cases referred to in art. 17, paragraph 4, of the Decree.

The adoption of measures deemed retaliatory is reported by the interested party, or by the trade union organisations, to ANAC. It is for the Company to demonstrate that the discriminatory or retaliatory measures, adopted against the reporting person, are motivated by reasons unrelated to the report. This reversal of the burden of proof does not operate for persons other than the reporting person (for example facilitators, colleagues, etc.).

Pursuant to art. 20 of the Whistleblowing Decree, a person is not punishable who reveals or disseminates information on the violations covered by the obligation of secrecy, other than that referred to in article 1, paragraph 3, of the Decree or relating to the protection of copyright or to the protection of personal data, or who reveals or disseminates information on the violations that offends the reputation of the person involved or reported, when, at the time of the revelation or dissemination, there were reasonable grounds to believe that the revelation or dissemination of the same information was necessary to reveal the violation, and the report, public disclosure or complaint to the judicial authority was made in accordance with the rules of the Decree.

A list of third-sector entities that provide reporting persons with support measures is established at ANAC. Such measures consist of information, assistance and advice free of charge on the methods of reporting and on the protection from retaliation offered by national and European Union regulatory provisions, on the rights of the person involved, as well as on the methods and conditions of access to legal aid at the State's expense.

Acts adopted in violation of article 17 of the Decree are null and void and the judicial authority seised adopts all the measures, including provisional ones, necessary to ensure the protection of the subjective legal situation asserted.

8. Collection and storage of information

Every piece of information, report, account and statement provided for in the Model is stored by the Supervisory Body in a specific archive (electronic or paper) for a period of at least 10 years.

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9. Data Protection

The processing of personal data in the management of the internal reporting channel and of the Reports received must be carried out in accordance with the GDPR and the Privacy Code and in accordance with the notice provided to the data subjects transcribed in the annex to this procedure (**Annex B**)

The Company has defined its own model for receiving and managing internal Reports, identifying technical and organisational measures suitable to ensure a level of security appropriate to the specific risks arising from the processing carried out, on the basis of a data protection impact assessment, pursuant to art. 35 of the GDPR.

The relationship with external suppliers who process personal data on behalf of the Company is governed by a data processing agreement, pursuant to art. 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 the provisions of art. 28 of the GDPR.

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

Reporting persons and Persons Involved must be provided with suitable information pursuant to articles 13 and 14 of the GDPR. In particular, the privacy notice referred to in **annex B**) of this procedure is provided.

With reference to the exercise of the rights and freedoms of the data subject, where the latter is the Person Involved, the rights referred to in articles 15 to 22 of the GDPR may not be exercised (by request to the Controller or by complaint pursuant to article 77 of the GDPR) where this may result in actual and concrete prejudice to the confidentiality of the Reporting person's identity (see article 2-*undecies* of the Privacy Code and article 23 of the GDPR) and/or to the pursuit of the objectives of compliance with the legislation on reporting unlawful conduct.

The exercise of the rights by the Person Involved (including the right of access) may therefore be carried out within the limits in which the applicable law allows and following an analysis by the competent bodies, in order to balance the need to protect the rights of individuals with the need to counter and prevent violations of the rules of good corporate management or of the applicable legislation on the matter.

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

10. Penalties

Anyone who is responsible for one of the following conduct is subject to financial penalties:

- commission of acts of retaliation against the Reporting person or the Linked Subjects in relation to Reports;

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- obstruction or attempted obstruction of the making of the Report;
- violation of the confidentiality obligations provided for by the Procedure and by the *Whistleblowing Decree*;
- failure to establish the Reporting channels in accordance with the requirements set out in the *Whistleblowing Decree*;
- failure to adopt a procedure for making and managing reports or non-compliance of the same with the *Whistleblowing Decree*;
- failure to verify and analyse the Reports received.

For all the conduct listed above, the disciplinary penalties provided for by Model 231 are also applicable.

Furthermore, the imposition of a disciplinary penalty against the Reporting person is provided for when (outside specific cases provided for by the *Whistleblowing Decree*) the following is established against them: (i) also by a first-instance judgment, criminal liability for the offences of defamation or calumny or in any case for the same offences committed by the complaint to the judicial authority, or (ii) civil liability, on the same grounds, in cases of wilful misconduct or gross negligence (Pursuant to the *Whistleblowing Decree*, in case (ii) the application of financial penalties from 500 to 2,500 euros by ANAC is also provided for

11. Annex A: form for reporting unlawful conduct or violations of the Model pursuant to Legislative Decree 231/01

Part I - Reporting person's details	
Reporting person's first name:	
Reporting person's surname:	
Tax code:	
Current position:	
Current organisational function:	
Position at the time of the reported fact:	
Organisational function at the time of the fact:	
Telephone:	
Email:	

Part II - Data and information on the unlawful conduct or conduct violating Model 231/01	
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Location where the fact occurred:	
Period in which the fact occurred:	
Date on which the fact occurred:	
Physical place where the fact occurred:	
Subject who committed the fact: First name, Surname, Position (more than one name may be entered)	
Any third parties involved or aware of the facts (First name, Surname, position, contact details):	

Manner in which they became aware of the fact:	
Area / Organisational function to which the fact can be attributed:	
Existence of any reports of the fact (where known) to the public Authority:	
“Other”, specify	

12. Annex B: privacy notice

INFORMATION PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679 ON THE PROCESSING OF PERSONAL DATA OF THE SUBJECTS WHO REPORT UNLAWFUL ACTS

DATA CONTROLLER

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LightHouse STA srl
Largo Francesco Richini 6
20122 Milano (MI)
lhlegal@pec.lhlegal.it

PURPOSE AND LEGAL BASIS OF THE PROCESSING

The processing is aimed at the receipt, analysis, investigation and management of the reports and of any consequent actions, and in particular at ascertaining the reported facts and adopting any measures. Pursuant to art. 6, paragraph 1, letter f) of European Regulation no. 679/2016 (hereinafter also the “Regulation”), all the personal data collected in the context of this processing are strictly functional and necessary for the pursuit of the provisions of Legislative Decree no. 24/2023, as well as for any needs of internal control, of monitoring of corporate risks, of defence of a right in court or for further legitimate interests of the Controller.

The contact details possibly provided by the reporting person will be used in the event that direct contact with them becomes necessary and for updates regarding the status of the report.

The data are provided voluntarily by the Data Subject/Reporting person, where they do not choose the anonymous form, to the Controller, who will not process data that are not strictly necessary for the purposes referred to in the following point.

In particular, the personal data collected are only those necessary and relevant for achieving the purposes indicated above, on the basis of the “minimisation principle”. With respect to these data, their provision is voluntary and the Data Subject is requested to provide only the data necessary to describe the facts that are the subject of the Report without communicating personal data that are redundant and additional to those necessary in relation to the purposes indicated above. Should they be provided, the Controller will refrain from using such data. The personal data are processed on the legal basis of the legitimate interest of the Controller, pursuant to art. 6, par. 1, letter f) of the GDPR, to manage the Reports of unlawful acts, of which the Reporting person has become aware for work reasons and/or within the employment relationship, as well as to protect the internal and external Data Subjects involved in the “Whistleblowing” procedure.

Personal data pursuant to art. 9 GDPR may be processed, where necessary, on the legal basis of the legitimate interest of the Controller, pursuant to art. 6, par. 1, letter f) of the GDPR, for the ascertainment, exercise or defence of a right in court, as well as on the legal basis pursuant to art. 6, par. 1, letter b) of the GDPR (“performance of the contract”) for certain aspects of the employment relationship.

TYPES OF DATA PROCESSED

The personal data subject to processing fall into the following categories:

Personal data of the reporting person in the case of reports made in non-anonymous form:

• *Common:*

-Mandatory: first name, surname, relationships with the company

-Optional: classification, role qualification/relationship, telephone contact, e-mail address.

Personal data relating to the person(s) involved in the report:

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-the data that the reporting person intended to provide to represent the facts described in the report. It is specified that in this case the company is not able to determine in advance the data subject to the report, which may therefore also include special data (for example criminal convictions, offences, etc.).

The aforementioned data will be processed using IT and paper supports that guarantee their security and confidentiality. Documentation in paper format is limited to the strict minimum and stored and kept in cabinets and rooms equipped with security locks. The transmission of the data provided by the reporting person by email will possibly be encrypted, thus guaranteeing the confidentiality of the information transmitted.

The personal data collected and processed by the Controller include “common” personal data of the Data Subjects (personal details, functions, contact details such as: email address, postal address, telephone number) and, possibly, in some cases, where necessary, also data belonging to special categories pursuant to art. 9 GDPR.

PROCESSING METHODS

The data are collected, in compliance with the legislation in force, by means of electronic, telematic and manual tools, with logics strictly connected to the purposes indicated above, so as to guarantee the security and confidentiality of the data themselves. In particular, they are collected through the electronic/telematic or paper tools used by the reporting person according to the method referred to in the procedure adopted by the company.

The data collected by means of electronic/telematic tools will not be subject to fully automated processing as specified in art. 22 GDPR.

Specific security measures are observed to prevent the loss of data, unlawful or incorrect uses and unauthorised access.

Furthermore, specific technical-organisational measures are adopted, pursuant to art. 32 GDPR, to guarantee the protection of the identity of the Data Subjects as well as the possible anonymity of the Reporting person and complete anonymity.

DATA RETENTION PERIODS

The personal data will be stored only for the time necessary for the purposes for which they are collected in compliance with the minimisation principle pursuant to art. 5.1.c) GDPR and, in particular, for the purposes of managing the investigation, of concluding the activity of defining the Report and of adopting the relevant measures, in the event of ascertainment.

RECIPIENTS OF THE DATA

Within Lighthouse STA srl, only the subjects charged with the processing by the Controller and authorised to carry out the processing operations within the framework of the aforementioned activities may become aware of the personal data provided.

The aforementioned data may be accessed by third parties (subsidiaries or third-party companies, such as IT service providers) that enable the operation as well as the maintenance of the IT tools on which the Report can be entered, required to process the data for the same purposes referred to in point 3 above, who are, for this purpose, appointed “Data Processors”, pursuant to art. 28 GDPR.

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The complete list of the subjects appointed as Processors is available from the head of the legal area. In no case will the personal data be subject to dissemination.

RIGHTS OF THE DATA SUBJECTS

Articles 15-22 GDPR confer on the Data Subjects the possibility of exercising specific rights, such as, for example, the right of access, of rectification, of erasure, of restriction of processing.

The above rights may be exercised by a request addressed without formalities to the Controller by registered mail, certified email (PEC) or to the following email address: lhlegal@pec.lhlegal.it

The Data Subject may lodge a complaint pursuant to art. 57, letter f) GDPR with the Data Protection Authority.

Where the exercise of the above rights by the Reported person may result in actual and concrete prejudice to the protection and confidentiality of the Reporting person's personal data, the Controller may limit, delay or exclude such exercise, pursuant to art. 2-*undecies*, par. 1, letter f) of the Privacy Code, and not act on the request.

In such cases, the rights of the Data Subject, pursuant to art. 2-*undecies*, par. 3 of the Privacy Code, may be exercised through the Authority in the manner referred to in art. 160 of the Privacy Code.

POSSIBLE TRANSFER OF PERSONAL DATA ABROAD

The management and storage of the data takes place on the Controller's servers or on the cloud platforms of third-party companies appointed as Data Processors, as indicated in point 6 above, located in Italy and within the European Union.

The personal data are not subject to transfer outside the European Union.