

INFORMATION

pursuant to Article 13 of Regulation (EU) 2016/679 on the protection of natural persons in respect of processing activities and to ensure the free movement of such data, and under the applicable Italian laws and regulations

SEA Prime S.p.A., with registered office in Milan 20138, Viale dell'Aviazione No. 65 (the "**Company**"), in order to allow data subjects to transmit reports of alleged misconduct ("**Whistleblowing Reports**") through the channels established by the Company in accordance with the legal provisions in force from time to time, as well as to allow the Company to manage the Whistleblowing Reports themselves and any related activities ("**Service**"), processes the personal data provided by data subjects in its capacity as data controller under Articles 4, paragraph 7, and 24 of Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons in respect of processing activities and to ensure the free movement of such data (the "**Regulation**") and in compliance with the applicable Italian laws and regulations.

The term processing shall mean any operation or set of operations, whether or not by automated means and applied to personal data or sets of personal data, including when not recorded in a data bank, such as collection, recording, organisation, structuring, storage, processing, selection, blocking, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The Company shall therefore, under the Regulation and in compliance with the applicable laws and regulations in force in Italy, process personal data for the purposes listed below.

1. Purposes and legal grounds for processing

The data shall be acquired and processed in compliance with the rules set in the Regulation and under the applicable Italian laws to manage Whistleblowing Reports, to carry out the necessary investigative activities, and to ensure the protection of the data subjects in the event crimes or irregularities of which they have become aware in the work context have been reported ("**Primary Purposes**").

Pursuant to Article 6, paragraph 1, letters (c) and (f) of the Regulation, all personal data collected as part of this processing, including through third parties, are strictly functional and necessary to fulfill a legal obligation to which the data controller is subject (i.e. obligation to establish a reporting channel pursuant to Art. 6 D. Legislative Decree 231/2001 and Legislative Decree 24/2023) and for the pursuit of the legitimate interest of the data controller (i.e. analysis and investigation of the report received).

2. Communication and disclosure of personal data for the pursuit of the Primary Purposes for processing

The data may be communicated to third parties when the communication thereof is mandatory under the law, including for the purposes of prevention/suppression of any illegal activity. With regard to Article 13, paragraph 1, letter (a) of the Regulation and the applicable Italian laws and regulations, the data may be disclosed exclusively for the pursuit of the above Primary Purposes to the staff/collaborators/consultants of the Company, and to third-party companies providing assistance to the Company in the pursuit of its Primary Purposes. An updated list of external data processors is available at the registered offices of the Company.

The data shall not be disclosed, or personal data shall not be disclosed to the public or in any case to an undetermined number of people.

3. Mandatory or Optional Provision of Personal Data for the Pursuit of the Purposes of Processing

The provision of data to the Company shall be mandatory only with respect to the data which provision is mandatory under the law. A refusal to provide mandatory data may force the Company to learn such data from third party sources (where legally possible) or lead to the non-performance of the Service. A refusal to provide data which provision is not mandatory under the law, but which are strictly functional to the performance of the Service, shall have no repercussions over the agreements in place, except that it may prevent carrying out operations connected to such data or the provision of the Service.

4. Transfer of personal data to Countries Outside of the European Union

The data collected and processed are not transferred to companies or other entities outside the territory of the European Community.

5. Data storage period

The personal data being processed shall be stored in compliance with the principle of proportionality and minimisation according to Article 5, paragraph 1, letter (c) of the Regulation until the Primary Purposes of the processing have been reached, without prejudice to the legal obligations.

6. Data Controller

The identification details of the Company data controller are the following:
SEA Prime S.p.A., with registered office in Milan 20138, Viale dell'Aviazione No. 65.

7. Data Protection Officer (DPO)

The Data Protection Officer can be contacted, including for the purpose of exercising the data subjects' rights under Articles 15-22 of the Regulation, writing via e-mail to privacy@seamilano.eu.

8. Rights of Data Subjects

As to the processing of data, data subjects may exercise the rights granted under Articles 15-22 of Regulation, summarised in Annex A to this privacy policy Information.

The above rights are not subject to any formal restrictions and can be exercised free of charge.

You may exercise these rights by sending your request to the Data Protection Officer at privacy@seamilano.eu or by regular mail addressed to the Data Protection Officer c/o the Company.

Annex A
European Regulation on the protection of personal data
Articles 15 to 22

Under Articles 15 to 22 of Regulation, data subjects have the right to obtain the rectification, supplementing, or erasure of their personal data (also known as “right to be forgotten”); the right to limit the processing of personal data and the right to data portability, the right to object to the processing of their personal data, including for profiling purposes, and lastly the right to lodge a complaint with the Privacy Supervisory Authority.