



PRIVACY POLICY
for processing relating to the
Whistleblowing procedure

pursuant to Art. 13 EU Regulation 2016/679





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We invite you to carefully read this privacy policy on the processing of personal data (hereinafter the "**Policy**") provided pursuant to Art. 13 of the EU Regulation 2016/679 (hereinafter the "**Regulation**") by PAGANI S.p.A. in its capacity as Data Controller, with specific reference to the personal data processed in the context of the use of the internal channels set up to send reports concerning breaches of national law (such as civil, administrative, criminal and accounting offences, conduct relevant under Legislative Decree no. 231/2001 and breaches of the organisational and management model adopted by Pagani) and of European law, in the cases typified by the reference legislation Legislative Decree no. 24/2023 (hereinafter collectively referred to as "**Reports**").

In general, all personal data (hereinafter also referred to as "**Personal Data**" and/or "**Data**") processed in the context of the use of the Platform shall be treated in compliance with the principles recognised by the applicable data protection regulations and the confidentiality criteria expressly provided for by Legislative Decree no. 24/2023.

For any further information on reportable violations pursuant to Legislative Decree no. 24/2023, on the use of the internal reporting channel set up by Pagani and on the external reporting channels, with particular regard to the conditions for submitting Reports through such channels, we invite you to read the document "*Procedure for the management of Reports*", available on the website www.pagani.com.

The Privacy Policy is divided into individual sections, each of which deals with a specific area, in order to make it as easy and straightforward to read and search for topics as possible.

DATA CONTROLLER

The data controller is the company Pagani S.p.A. (hereinafter "Pagani") with registered office in Via dell'Artigianato, 5 - Vill. La Graziosa 41018 San Cesario sul Panaro (MO) Italy, Tel. +39 059 4739201 - Fax +39 059 927377, email: info@pagani.com.

PERSONAL DATA PROCESSED

Pagani, in compliance with the provisions of Legislative Decree no. 24/2023, has adopted a specific "*Reporting Management Procedure*" and implemented a specific internal channel for sending reports concerning acts, conduct and/or omissions that constitute violations of national law (such as civil, administrative, criminal, accounting offences, conduct relevant under Legislative Decree no. 231/2001 and violations of the organisational and management model adopted by Pagani) and of European legislation in the cases typified by the reference legislation. Such Reports shall be taken in charge and managed by the subjects designated by the Company as Report Managers (hereinafter referred to as "**Managers**"). The internal reporting channels, specifically described in the above-mentioned procedure, are as follows:

a) **Sending of the Report through a dedicated "Whistleblowing" Platform** (hereinafter the "**Platform**") accessible through a specific link (<https://segnalazioni.pagani.com/#/>) through which the reporter, with the guarantees of confidentiality provided, may communicate any appropriate information on the alleged unlawful conduct of which he/she has become aware by reason of and within the scope of the qualified legal relations considered by the legislator, so that they may be submitted to the Managers by the Company.

b) **Direct meeting with the Managers**, by sending a specific request to the email and telephone numbers indicated in the related Procedure. The Manager who receives the oral Report will take care of filling in the questionnaire on the Platform and, at the end, will communicate to the reporter the unique code to monitor the status of the Report and for any future communication with the Manager.

That said, the Personal Data subject to processing are those indicated below with reference to the different categories of interested parties potentially involved. In particular, please note that the provision of the Data marked with an asterisk symbol (*) in the fillable fields in the various sections of the Report is necessary in order to successfully complete its submission.

Data related to the reporting subject: the reporting subject, as per the fillable fields in the different sections of the Reporting via the Platform, shall be required to indicate his/her Personal Data such as: first name, last name, job title or job position at the time of the reported facts and current job title, personal mobile phone number, personal email address or other address, as well as any other data, including Personal Data, possibly contained in the Reporting fields that require a factual description of the offence. Through the Platform it is also possible to attach documents, which may also contain Personal Data related to the reporter or to third parties.



The whistleblower may send anonymous Reports (i.e. he/she may choose not to provide data that can identify him/her or make him/her identifiable). Such Data may be provided at a later stage by integrating the Report.

The identity of the person making the Report is in any case always protected from the point of view of confidentiality: any disclosure of the identity of the person making the Report (in the cases provided for by the law in Article 12 of Legislative Decree no. 24/2023) to persons other than those competent to receive and follow up the Reports always takes place with the express consent of that person.

In the event of an oral Report, the person making the Report cannot remain anonymous, given the modality of the Report.

Data related to third parties: the reporting party, in the context of the Report, may also communicate Personal Data related to third parties if he/she deems it indispensable. For instance, the Report could contain Data relating to third parties indicated as persons having knowledge of the facts, facilitators or executors of the conduct deemed unlawful. At the reporting party's discretion, Personal Data of third parties, such as name, surname, contact details, entity or company to which the reporting party belongs, job title or position held, may be processed.

Data related to the Manager: Managers of reports receive specific credentials for the performance of activities related to the management of reports, including those received via the Platform. Data such as: name, surname, email address, telephone number are processed with reference to those concerned.

Browsing data and technical cookies: given the particular context, the Platform does not store any type of technical log, nor any personal data of the user, removing the IP address and the details of the user agent used for requests. Therefore, only technical service information is stored, such as: time, type and protocol of the request, resource of the request, time and code of the response. The Platform only uses technical session cookies and does not use any type of profiling and/or third-party cookies. The encryption of the communication protocol also means that it is impossible, through the content of the data in transit, to associate the IP address of reporting users with any other information that could make them identifiable. As for the reporting administrator's credentials, so-called obfuscated logs are collected, i.e. not directly traceable to the administrator user.

PURPOSE OF THE PROCESSING AND LEGAL BASIS

Within the limits established by the regulations in force, the Data shall be processed by Pagani for the following purposes:

a) to allow the performance of operations strictly connected and instrumental to the correct collection and management of Reports of potential violations sent through the internal channels set up by the Company (Report Management). The Data and information provided by the person reporting the alleged unlawful conduct, including omissions, of which he/she has become aware as a result of his/her relationship with Pagani, shall be processed in order to carry out the necessary investigative activities aimed at verifying the truthfulness of the fact being reported as well as, where well-founded, for the adoption of the consequent measures. Therefore, failure to provide the Personal Data requested for this purpose and marked in the Reporting sections of the Platform with an asterisk (*), or the ascertained incorrectness of the Data provided, may result in the impossibility to successfully conclude the reporting procedure.

The legal basis for the processing is the fulfilment of regulatory obligations, with particular reference to Legislative Decree no. 231/2001 governing the administrative liability of legal persons, companies and associations, including those without legal personality, and to Legislative Decree no. 24/2023 implementing Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of national laws.

b) to allow the fulfilment of obligations that may be provided for by further compulsory regulatory sources or provisions issued by Authorities to which Pagani is subject ("**Legal Obligations**"). The provision of Personal Data and the relevant processing for such purposes are necessary in order to fulfil the legal obligations imposed on the Controller in accordance with applicable laws, which may include the storage and communication of Data to the competent authorities.

RECIPIENTS AND TRANSFER OF PERSONAL DATA

The Personal Data will be disclosed to the Managers designated by Pagani, who are duly authorised to process it and who have committed to confidentiality or have been given an appropriate legal duty of confidentiality.

In order to fulfil the duty of confidentiality provided for by Legislative Decree no. 24/2023, the Data Controller has adopted a series of specific measures, including ensuring that the Platform and in general the internal reporting channels allow selective access to Reports received only by authorised personnel. In addition, the identity of the reporter and any other information from which this identity may be inferred, directly or indirectly, will not be disclosed to persons other than those competent to receive and follow up the Report, except with the express consent of the reporter and, in the cases provided for by law, also after sharing the reasons for disclosure.

The processing of Personal Data is also, in part, as far as the Platform is concerned, entrusted to third parties duly designated as Data Processors insofar as they process Data on behalf of Pagani (e.g. the Platform provider, the company ISWEB S.p.A.).

Finally, Personal Data will be communicated, where requested or necessary, to the competent authorities in accordance with the provisions of the laws in force.



In the event that the requirements provided for by the reference legislation are met and the reporting party intends to turn to the external reporting channels ANAC or it is necessary to forward the Report to the other competent Authorities, these will act as autonomous and distinct Data Controllers and, therefore, please refer to the procedures and privacy notices made available by them.

The data will not be disseminated and will not be transmitted to countries other than those of the European Union or the European Economic Area.

DATA RETENTION PERIODS

The Personal Data processed for the Management of Reports shall be kept for 5 (five) years from the sending of the Report, in order to allow the Managers to carry out the activities consequent to the Report and, subsequently, to keep track of the Reports managed.

The Personal Data processed for the purpose of legal obligations shall be kept by Pagani for the period envisaged by the applicable mandatory provision.

RIGHTS OF DATA SUBJECTS

It should be noted that, in view of the intrinsic nature of the data processed and the purposes of the processing, in the event of requests to exercise rights, the Data Controller will take into account the provisions of Article 2 undecies of the Privacy Code, entitled 'Limitations to the rights of the data subject', which, at letter f), provides that the rights recognised by the Regulation may not be exercised if the exercise of such rights may result in actual and concrete prejudice to the confidentiality of the identity of the employee who reports the offence of which he has become aware by reason of his office.

In cases where, at the express request of the Data Controller, the person concerned consents to the disclosure of his/her identity to persons other than those competent to receive and follow up the Reports, he/she may revoke such consent at any time, provided that the Data Controller has not already disclosed his/her identity on the basis of the consent previously and legitimately given.

The data subject has the right in relation to the Data, which may be exercised at any time, to request access to the Data (and/or a copy of the Data) as well as further information on the processing underway; to request rectification or updating of the Data; to request deletion of the Data where you consider that the processing is unnecessary or unlawful; request the limitation of the processing if you believe that the Data are not correct, necessary or unlawfully processed, or if you object to their processing; exercise the right to Data portability, i.e. to obtain a copy of the Data in a structured, commonly used and machine-readable format or to request their transmission to another Data Controller; object to their processing. Should Pagani make use of the limitations described above, the Data Subject will be notified without delay and in writing. In such cases, the rights of the interested party, pursuant to Art. 2 undecies, paragraph 3 of the Privacy Code, may also be exercised through the Garante per la Protezione dei Dati Personali in the manner set forth in Art. 160 of the Privacy Code.

The above rights may be exercised by writing to the email address privacy@pagani.com.

The data subject also always has the right to lodge a complaint with the competent Supervisory Authority (e.g. that of the State in which he or she has his or her habitual residence, in Italy the Garante per la Protezione dei Dati Personali) if he or she considers that the processing of his or her Data is contrary to the applicable data protection legislation.

Last modified: March, 13th 2025