

INFORMATION

Sierra Italy Agency S.r.l. with Sole Quotaholder – Subject to direction and coordination of Sonae SGPS S.A., (fully identified below) in its capacity as controller, provides, pursuant to the GDPR (General Data Protection Regulation; Regulation (EU) 2016/679 of 27 April 2016) and any further legislation on data protection that is applicable, upon collection of personal data included in your report under (i) Legislative Decree no. 65 of 30 March 2001 ("*Protection of public employees who report wrongdoing*"), subsequently amended by Law no. 179 of 30 November 2017 ("*Provisions for the protection of perpetrators of reports of crimes or irregularities of which they have become aware in the context of an employment relationship*") and (ii) Legislative Decree no. 24 of 10 March 2023 in execution of EU Directive 2019/1937 dated 23 October 2019 regarding the protection of whistleblowers, the following information:

1. Identity and contacts of the controller	Sierra Italy Agency S.r.l., with register, fiscal and VAT number 11024650969, with share capital of Euros 10,000.00=, and registered address at Milan (Italy), Corso Garibaldi, 86.
2. Categories/Types of personal data	The personal data may include the following types of personal data: (i) any identification or contact data of the whistleblower (or informant) provided in the report; (ii) any different personal data the whistleblower reveals in its report; (iii) any personal data of the informant the Controller may already have and which proves necessary for the adequate investigation and assessment of the violation reported.
3. Contact of the data protection officer	dpo.sierraagency@sonaesierra.com
4. Purpose of processing	Compliance with the law on the protection of whistleblowers, notably receiving the report and managing the inherent investigation and the communications with the informant.
5. Legal basis for the processing	Legal Obligation: (i) Legislative Decree no. 65 of 30 March 2001 subsequently amended by Law no. 179 of 30 November 2017, and (ii) Legislative Decree no. 24 of 10 March 2023 in execution of EU Directive 2019/1937 dated 23 October 2019 regarding the protection of whistleblowers.
6. Recipients or categories of recipients of the personal data	Competent authorities if the breach of the law reported is to be further reported to them.
7. Transfer of personal data to third country/international organisation	Not applicable

8. Storage period of personal data	The personal data will be stored for the maximum period of 10 (ten) years. However, any personal data communicated by the whistleblower in the report and which is not relevant for the management of the reported violation will be deleted immediately.
9. Existence of automated decision-making including profiling	Not applicable

Additional Information:

A – Rights of the data subject

- The data subject may exercise before the controller with respect to the personal data concerning him/her and upon verification of the applicable legal conditions, the following rights:

- Right of access,**
- Right to rectification,**
- Right to erasure (right to be forgotten),**
- Right to the restriction of processing,**
- Right to object,**
- Right to data portability.**

For more information on the data subject’s rights and the legal conditions for their exercise, please refer to articles 15 to 22 of the GDPR.

The data subject has also **the right to lodge a complaint with the competent supervisory authority.**

- The data subject can exercise its rights by e-mail to the following address:
dataprotection@sonaesierra.com

B – Provision of personal data: the provision of personal data in this context is neither a statutory or contractual requirement, nor is it a requirement necessary to enter into a contract; the data subject is not obliged to provide his/her personal data and should he/she choose not to no consequences will derive from it except for the impossibility to communicate to him/her the measures taken should he/she not have provided his/her contact.