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|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
|  | <p>INFORMATION pursuant to Article 13 of the<br/>General Data Protection Regulation (EU)<br/>2016/679<br/>For<br/>REPORTING SUSPECTED OFFENCES</p> | Privacy Organizational<br>Model |
|                                                                                   |                                                                                                                                                    | June 26, 2025                   |
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## Premise

Pursuant to current legislation, an organization must adopt protection tools to allow the reporting of illicit acts or violations relating to behaviors, acts or omissions committed by individuals within the organization that harm the interests and integrity of Alpha Trading SpA. and of which the whistleblower became aware by virtue of the legal relationship existing with Alpha Trading SpA itself

By way of example and not limited to, reports may concern administrative, accounting, civil, or criminal offenses, unlawful conduct pursuant to Legislative Decree 231/2001, or violations of the organizational and management models provided for therein, including those set forth in the "Procedure for reporting harassment and suggestions for organizational improvement." For a complete description of the violations that may be reported, please refer to Article 2 of Legislative Decree 24/2023 and the aforementioned Procedure.

This information is intended for the authors of reports relating to alleged illicit activities and for the natural persons to whom the information content of the report may refer, in their capacity as subjects involved in various capacities in the matters brought to the attention of Alpha Trading SpA, through the internal reporting channel dedicated to them.

All reporting is subject to strict confidentiality principles, which require that only those individuals (report managers) expressly authorized by the company to process the report will be able to match the report to the identity of the reporting person (where identifiable) and any other individuals mentioned therein.

The investigative activities undertaken following a report may lead to its archiving due to its groundlessness or to the transmission of the information collected to the appropriate internal or external bodies for appropriate action.

If investigation requirements require other individuals within the company to be made aware of the contents of the report or the accompanying documentation, the identity of the whistleblower and the facilitator, or any other information that could directly or indirectly allow their identification, will not be disclosed to anyone other than those explicitly authorized. If the possibility of challenging the offense is based, in whole or in part, on the report received and knowledge of the whistleblower's identity is essential to allow the reported individual to defend themselves in court, the whistleblower will be notified in writing by the authorized company individual. However, the report, unless defamatory or false, cannot be used for disciplinary purposes without the whistleblower's express consent to disclosure of their identity.

The company also protects the identity of the individuals mentioned in the body of the report until the conclusion of the proceedings initiated following the report, applying the same guarantees provided to the whistleblower. The Reporting Manager will communicate exclusively through this channel, which we encourage you to consult following a report. Further information is available in the whistleblowing information section of the institutional website.

## THE DATA CONTROLLER

The data controller is Alpha Trading SpA, with registered office in Milan, Piazza della Repubblica 26, 20124, VAT number 11879090154, email: [info@alphatrading.it](mailto:info@alphatrading.it) , certified email : [alphatrading@pec.alphatrading.it](mailto:alphatrading@pec.alphatrading.it) (hereinafter Alpha Trading), which you can contact via the address indicated or via the email address [privacy@alphatrading.it](mailto:privacy@alphatrading.it).

## ORIGIN OF YOUR PERSONAL DATA

The personal data processed are those provided by the reporting party and those collected independently by the authorised Alpha Trading party during the investigative activities necessary to evaluate the information reported .

## PURPOSE AND LEGAL BASIS OF THE PROCESSING

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Alpha Trading processes the aforementioned data for the following purposes through the authorized entity and the identified internal channel:

**(a)** the management of reports, pursuant to art. 6 paragraph 1, letter c) of the GDPR, pursuant to Law 179/2019 and Legislative Decree 24/2023;

**(b)** the pursuit of the legitimate interest of Alpha Trading, pursuant to art. 6 paragraph 1, letter f) of the GDPR, consisting of:

or in the protection of Alpha Trading. in judicial or administrative proceedings or in extrajudicial disputes;

or in response to any requests from the competent authorities;

or in the security and protection of Alpha Trading's IT reporting channel

or in the application of disciplinary sanctions pursuant to the provisions of the organisation and control model adopted by the company .

#### **MANDATORY PROVISION OF PERSONAL DATA**

Providing data is not mandatory, as reporting is voluntary and the decision on which personal data to provide, even with reference to other individuals, is left to the reporting party.

#### **PLACE OF PROCESSING OF PERSONAL DATA**

Your personal data is processed within the European Union or in countries permitted by the GDPR.

#### **COMMUNICATION OF YOUR PERSONAL DATA TO THIRD PARTIES**

Personal data may be processed as data controllers by the providers of the My Governance reporting platform of MYGO srl, a Zucchetti group company, which ensures the functioning of the dedicated communication channel for reporting. Alpha Trading has designated the Head of the Legal and Human Resources Department as the Reporting Manager. Without prejudice to Alpha Trading's reporting and reporting obligations, personal data will not be further disclosed to third parties or disseminated.

#### **PERIOD OF RETENTION OF PERSONAL DATA**

Personal data that are clearly not useful for evaluating the report will be immediately deleted.

The reports and related communications will be retained for five years from the date of communication of the final outcome of the reporting procedure.

#### **YOUR RIGHTS**

Pursuant to Article 13 of Legislative Decree 24/2023, the rights set forth in Articles 15 to 22 of the GDPR may be exercised within the limits of Article 2-undecies of the Privacy Code. If the exercise of these rights could result in actual and concrete harm to the confidentiality of the identity of the person reporting violations, the aforementioned rights may only be exercised by submitting a request to the designated person at Alpha Trading , who can be contacted at [privacy@alphatrading.it](mailto:privacy@alphatrading.it) (an email address managed by the expressly designated and authorized person who guarantees the confidentiality and protection of the whistleblower and other individuals to be protected and will ensure secure archiving outside of company-controlled facilities) or by filing a complaint pursuant to Article 77 of the GDPR. However, the data subject may exercise these rights through the data protection authority, in accordance with the procedures set forth in Article 160 of the Privacy Code.

Facilitators and those reported are also affected by the reporting process. For these two individuals, all privacy rights can be respected only with the intervention of the Italian Data Protection Authority (Autorità Garante della Protezione dei Dati Personali, or ANAC) .

#### **DOCUMENT UPDATE**

Alpha Trading reserves the right to update this document by posting it on our website. We encourage you to always review the updated version.