

POLICY ON THE PROTECTION OF PERSONAL DATA **pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR")**

This policy relates to the processing of personal data collected by the company **Pink Frogs Cosmetics Srl**, based in Viale Toscana 46, Rozzano (MI), in its capacity as Data Controller (hereinafter, "Company" or "Data Controller") in the process of receiving and managing Whistleblowing Reports, in accordance with the regulations of Legislative Decree 24/2023.

In particular, the Company, pursuant to the aforementioned regulations, has adopted its own internal reporting channel governed by a specific Procedure (hereinafter, "**Whistleblowing Policy**") and has made it available to recipients (employees, customers, suppliers, business partners, consultants, collaborators, etc., hereinafter "**Whistleblowers**") who intend to make a report (hereinafter also "**Report**") of unlawful conduct and violations of national and European Union laws that affect the integrity of the Company, of which they have become aware in the context of their own work context.

Reports can be made through different modalities described in the Whistleblowing Policy and briefly summarized below:

- (a) telematically, through a special Portal made available by the Company and accessible at the following link <https://pinkfrogs.it/whistleblowing/>
- b) orally, via dedicated telephone line 02 8257820 int. 113;
- c) by direct meeting with the Managers, at the request of the Reporting Officer.

TYPE OF DATA COLLECTED

If a Report is submitted, the Company—exclusively through the specifically appointed and authorized Manager(s)—will collect and process the following information, which includes the personal data of the Reporting Party, such as name, surname, contact details, and the information contained in the Report, including the personal data of the reported person(s), such as name and surname, company role (hereinafter also referred to as "**Personal Data**").

In principle, so-called "special" personal data (relating, for example, to health conditions, sexual orientation, or trade union membership, as referred to in Article 9 of the GDPR) are not processed. However, depending on the content of the Report and any documents attached to it, the Reporting Party may communicate this type of data in the context of the Report itself. It is recommended that such "special" data be included in the Report only if absolutely necessary for the purposes of submitting the Report.

The Report must not contain abusive language or personal insults aimed solely at offending or damaging the honor and/or personal and/or professional reputation of the person or persons to whom the reported facts refer.

PURPOSE AND LEGAL BASIS OF THE PROCESSING

A. Personal data will be processed for the purposes of managing and verifying the Report and to ensure the proper application of the Whistleblowing Policy.

In particular:

- (i) to assess the admissibility of the Report;
- (ii) to verify the validity of the Report and, if necessary, reconstruct the causes and consequences of the reported facts and the related responsibilities;
- (iii) to take corrective and preventive measures as well as any disciplinary and/or punitive measures and, where necessary, refer the matter to the competent authorities.

The legal basis for the processing is the fulfillment of a legal obligation to which the Data Controller is subject pursuant to Article 6, paragraph 1, letter c) of the GDPR as provided for by Legislative Decree 24/2023, which requires each Data Controller to have an internal channel for receiving Reports.

As regards any “special” data and data relating to any convictions communicated in the Report and essential for its management, the processing is based on Article 9(2)(b) and Article 10 of the GDPR.

The provision of the Whistleblower's personal data is optional; in fact, based on the Whistleblowing Policy adopted by the Data Controller, the Whistleblower has the right to remain anonymous.

If the Report is submitted through the Portal, the Whistleblower's data will also be processed to allow registration on the Portal.

B. Personal data may be processed for purposes related to the defense of rights in judicial, administrative, or extrajudicial proceedings and in the context of disputes arising in relation to the Report made, in compliance with the confidentiality provisions of Legislative Decree 24/2023.

The prerequisite for such processing is the legitimate interest of the Data Controller pursuant to Article 6, first paragraph, letter f) of the GDPR in protecting its rights. In this case, no new and specific provision of data is required, as the Data Controller will pursue this additional purpose, where necessary, by processing the Personal Data collected for the above purposes, which are considered compatible with this one (also due to the context in which the Personal Data was collected, the relationship between the Whistleblower and the Company involved, the nature of the data itself and the adequate safeguards for its processing, as well as the link between purpose A. and this additional purpose).

The Report must not contain facts that are not relevant to the Report itself. Personal data that is clearly not useful for the processing of a specific Report is not collected or, if collected accidentally, will be deleted immediately.

METHOD OF PROCESSING AND CONFIDENTIALITY OF THE IDENTITY OF THE WHISTLEBLOWER

The processing of Personal Data will be based on principles of correctness, lawfulness, and transparency and may also be carried out using automated methods and IT tools designed to store, manage, and transmit such data.

The processing will be carried out—for each of the channels of acquisition of the Report described above and at every stage of the process of receiving and managing the Report itself—using tools and measures adopted by the Data Controller that are suitable for ensuring - including through the use of encryption tools - the confidentiality of the identity of the whistleblower, the person involved and any person mentioned in the report, as well as the content of the report and related documentation, also in order to avoid the risk of loss,

unauthorized access, unlawful use and dissemination. Measures that the Data Controller has identified also following a specific assessment of the impact on the protection of personal data, which the Data Controller itself has carried out with reference to the processing operations connected with the management of Reports.

The processing of Personal Data relating to the receipt and management of Reports will be carried out, pursuant to Article 4 of Legislative Decree 24/2023, exclusively by persons expressly authorized and trained by the Data Controller for the management of the reporting channel pursuant to Article 29 of the GDPR (the “Managers”), in compliance with the principles set out in Articles 5 and 25 of the GDPR.

Personal data that is clearly not useful for the processing of a specific Report will not be collected or, if accidentally collected, will be deleted immediately.

The Data Controller protects the confidentiality of the identity of the Whistleblower, the persons involved, the persons mentioned in the Report, as well as the content of the Report itself and the related documentation, in compliance with adequate safeguards in accordance with Legislative Decree 24/2023.

The identity of the whistleblower and any other information from which that identity can be inferred, directly or indirectly, may not be disclosed, without the express consent of the whistleblower, to persons other than those competent to receive or follow up on reports, specifically authorized and instructed to process such data in accordance with Article 29 of the GDPR (the aforementioned “Managers”).

Reports and related documentation will be kept for the time necessary to process the Report and in any case for no longer than five years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set out in Legislative Decree 24/2023.

Furthermore, the data will be permanently deleted or anonymized when the above purposes have been achieved, unless the Data Controller is required to retain it for a further period of time in order to comply with legal obligations. In any case, the data will not be retained for more than 5 years from the date of communication of the final outcome of the reporting procedure.

After the above retention periods have elapsed, Reports may only be retained in anonymized form for statistical purposes.

DATA RECIPIENTS

Except for the completion of any investigations initiated as a result of the Report, as well as the fulfillment of legal obligations, the Personal Data provided will not be communicated and/or disseminated. Access to the Personal Data contained in the Reports will be granted exclusively to the person(s) expressly authorized and instructed by the Data Controller pursuant to Article 29 of the GDPR and identified as the Report Managers in the Whistleblowing Policy, in compliance with the rules of confidentiality and data processing guarantees indicated in that Policy.

In addition, Personal Data may be shared with the Data Controller's legal advisors and with the Judicial Authority, in accordance with the procedures provided for by current legislation on whistleblowing and in compliance with the guarantees related to professional secrecy.

The Data Controller also uses a technology partner that provides the IT portal for managing Reports, which has been designated by the Data Controller as Data Processor pursuant to Article 28 of the GDPR by means of a specific written document.

CONTACTS

The contact details of the Data Controller are as follows:

- Pink Frogs Cosmetics Srl, with registered office in Viale Toscana 46, Rozzano (MI), email address:



RIGHTS OF DATA SUBJECTS

Without prejudice to any limitations indicated below, data subjects have the right to request:

- access to personal data concerning them, as provided for in Article 15 of the GDPR;
- the correction or integration of personal data held by the Data Controller that is deemed inaccurate, as provided for in Article 16 of the GDPR;
- the erasure of Personal Data for which the Data Controller no longer has any legal basis for processing, as provided for in Article 17 of the GDPR;
- the restriction of the way in which the Data Controller processes Personal Data if one of the cases provided for in Article 18 of the GDPR applies.

Each data subject may exercise these rights by writing to the Data Controller at the email address indicated above in the “Contacts” section.

Right to object: in addition to the rights listed above, data subjects have the right to object at any time, on grounds relating to their particular situation, to the processing of data concerning them carried out by the Data Controller to pursue its legitimate interests. The request to object must be addressed to the Data Controller at the email address indicated above in the “Contacts” section.

The aforementioned rights may be limited pursuant to and for the purposes of Article 2, undecies, first paragraph, letter f) of Legislative Decree 196/2003, as amended by Legislative Decree 101/2018 and Legislative Decree 24/2023, if the exercise of the above rights could result in concrete and actual prejudice to the confidentiality of the identity of the Whistleblower. The assessment of the need to limit the rights of the data subject is left to the Data Controller, who avails itself of the competent functions in this area.

If the data subject believes that the processing of their Personal Data is in violation of the provisions of the GDPR, they have the right to file a complaint with the Data Protection Authority, using the contact details available on the website www.garanteprivacy.it, or to take appropriate legal action.