



DATA PROTECTION STATEMENT

Reports pursuant to Italian Legislative Decree 24/2023
(so-called Whistleblowing Decree)

This statement is provided pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereafter “**Regulation**”) and applies to personal data concerning the reporting person (hereinafter also the “whistleblower”) or the person concerned by a report collected by **Colliers Global Investors Italy SGR S.p.A.** through the internal reporting channel activated in accordance with Italian Legislative Decree 24/2023.

For the purposes of Legislative Decree 24/2023, the whistleblower is the natural person who reports or publicly discloses information on breaches acquired in the context of his or her work-related activities, while the person concerned is the natural and legal person who is referred to in the report or public disclosure as a person to whom the breach is attributed or a person who is, in any capacity, involved in the breach.

Pursuant to the Regulation, “processing” means any operation, including the mere collection and/or storage, of the personal data of any natural person (hereafter also “**Data Subject**”), “controller” means the natural or legal person which determines the purposes and means of the processing, and “personal data” means any information relating to an identified or identifiable natural person, including indirectly, by reference to any other information.

In light of the foregoing, processing will concern personal data provided to the Controller by the Data Subject for managing reports pursuant to Legislative Decree 24/2023 (hereafter, collectively, “**Personal Data**”).

1. CONTROLLER

The Controller is **Colliers Global Investors Italy SGR S.p.A.**, with registered office in Milan, Corso Giacomo Matteotti 10 - 20121, Tax Code and VAT No. 06817000968, e-mail privacy.italy@colliersglobalinvestors.com, certified e-mail (PEC) colliersitalysgr@pec.it, telephone number +39 02 87246183, fax number +39 02 87246187.

The Controller may be contacted free of charge by writing to the e-mail address privacy.italy@colliersglobalinvestors.com, or by sending a registered letter with return receipt to the registered office as identified above.

The Data Protection Officer (DPO) appointed by the Controller is attorney-at-law Francesco Conti with his office in Milan, Corso Europa 12. The Data Protection Officer may be contacted freely and at no charge at the telephone number +39 0230309330 and the above e-mail address privacy.italy@colliersglobalinvestors.com, as well as at the certified e-mail address (PEC) francesco.conti@milano.pecavvocati.it.

2. PERSONAL DATA PROCESSED AND PURPOSE OF THE PROCESSING

2.1. Colliers may process the following Personal Data of the Data Subject: identifiers such as the name and surname, contact details, professional role or position, workplace, other information relating to the Data Subject included in the reports or acquired during the investigation launched by the person in charge

of managing the report (also including the special categories of personal data pursuant to Articles 9 and 10 of the GDPR).

2.2. Personal Data referred to in point 2.1 above will be used for the following purposes:

- (i) compliance with a legal obligation to which the Controller is subject;
- (ii) protecting the Controller's personnel and the company's capital and assets;
- (iii) preventing, investigating and persecuting offences and actions that may lead to disciplinary sanctions;
- (iv) establishment, exercise or defence of legal or administrative claims or claims under an arbitration or reconciliation procedure.

3. **LEGAL BASIS FOR PROCESSING**

The legal basis for the processing of Personal Data pursuant to point 2.2 above is:

- with reference to letter (i), compliance with a legal obligations pursuant to Article 6(1)(c) of the Regulation;
- with reference to letters (ii), (iii) and (iv), the legitimate interests pursued by the Controller pursuant to Articles 6(1)(f) and 9(2)(f) of the Regulation.

4. **NATURE OF PERSONAL DATA CONFERMENT**

For the purposes of point 2.2 above, Personal Data conferment is necessary for complying with the legal obligations imposed on us and for pursuing our legitimate interest.

5. **CATEGORIES OF RECIPIENTS TO WHOM PERSONAL DATA MAY BE DISCLOSED**

5.1 The Data Subject's Personal Data may be processed exclusively by Colliers' collaborators and/or employees in the context of their respective functions and by **Testudo S.r.l.**, with registered office in Milan, via Picco 31, VAT code 10520950964, charged with providing the whistleblowing platform pursuant to Legislative Decree 24/2023 and duly appointed as "processor" in accordance with Article 28 of the Regulation.

5.2 In any case, these parties will act in compliance with the Controller's instructions.

5.3 Where necessary, data may be accessible to a judicial authority or the police upon specific request. Where necessary or required by laws, regulations, European legislation or decisions of courts, arbitrators or public authorities, or in order to fulfil contractual obligations (e.g., public entities, supervisory authorities, banking institutions, etc.), personal data may be transmitted to parties to which disclosure has been envisaged. Data may also be disclosed to Internet providers, Web administrators and data entry and mailing companies.

6. **DATA STORAGE PERIOD**

The Data Subject's personal data contained in the reports and the related documentation shall be stored for the time necessary to follow up the reports and, in any case, for no longer than five years from the date of notification the final outcome of the reporting procedure.

It is understood that, if, following a report, the Controller decides to launch a disciplinary proceeding, initiate legal or administrative action, or undertake an arbitration or reconciliation procedure, the Data Subject's personal data will be stored for a period equal to the duration of the proceedings or the period of prescription of the rights whose establishment, exercise or defence gives rise to the need for the processing, even if in excess of the retention periods indicated above.

At the end of the data processing period, Personal Data will be erased or permanently anonymised.

7. METHODS OF PROCESSING

Personal Data shall be processed by Colliers using IT and paper-based systems through registration, consultation, communication, storage and erasure using electronic tools or manually, according to the principles of lawfulness, fairness and transparency provided for in applicable legislation on personal data protection while also ensuring confidentiality and protecting the Data Subject's rights through adoption of technical and organisational measures appropriate to ensuring a level of security adequate to the risk profile.

8. RIGHTS OF THE DATA SUBJECT

The Data Subject's rights include: (i) the right to request from the Controller access to Personal Data and the related information; the right to the rectification of inaccurate Personal Data or to have incomplete Personal Data completed ; the erasure of Personal Data (should one of the conditions specified in Article 17, paragraph 1, of the Regulation, occur and in compliance with the exceptions provided for in paragraph 3 of the same Article); the right to restriction of processing of the Personal Data provided (should one of the conditions specified in Article 18, paragraph 1, of the Regulation, occur); (ii) the right to request to and obtain from the Controller — where the legal basis for the processing is compliance with a contractual obligation or the consent, and processing is carried out by automated means — Personal Data in a structured, machine-readable format, including for the purpose of transmitting such Personal Data to another controller (so-called right to data portability); (iii) the right to object at any time to the processing of Personal Data provided, when particular situations occur involving the Data Subject; (iv) the right to lodge a complaint with a supervisory authority (Italian Data Protection Authority - www.garanteprivacy.it).

In order to exercise these rights, the Data Subject may at any time contact the Controller at the above-mentioned contract details or by sending a registered letter with return receipt to its registered office.

9. UPDATES TO THE STATEMENT

This Data Protection Statement is subject to periodic revision.

In the event of amendments to the data processing, Colliers will promptly disclose them. Where required by applicable legislation, the Data Subject may grant his or her consent to any new processing. In the event of refusal, Personal Data will not be processed according to the amendments contained in the new version of the Data Protection Statement.

10. TRANSFER ABROAD

Personal Data will not be transferred to non-EU countries. In any case, Colliers reserves the right to use in-cloud services. In such case, service providers will be selected among those that ensure appropriate safeguards, as provided for in Article 46 of the Regulation.

Colliers Global Investors Italy SGR S.p.A.