

## Policy privacy

This privacy policy is provided pursuant to Articles 13 and 14 of Regulation (EU) 679/2016 ("GDPR") to all data subjects who make a report of which they become aware or witness, as part of their relationship with Lottomatica S.p.A. or with one of the other Companies of the Lottomatica Group, as well as to the other subjects involved in any capacity in the management of the report. The privacy policy therefore applies whenever a report is made through one of the methods indicated in the Reporting Management Procedure adopted by the Data Controller and as updated from time to time.

Lottomatica S.p.A., has adopted an organization, management and control model pursuant to Legislative Decree No. 231/2001 (hereinafter "**Model 231**") aimed at preventing the commission of the offences set forth in said decree, as well as a corporate procedure pursuant to the applicable discipline to encourage employees, directors, members of the corporate Bodies and third parties that have business relations of any nature with the Lottomatica Group to report a potential violation of the Code of Ethics, the Organization, Management and Control Model pursuant to Legislative Decree No. 231/01, the Group's external regulations and internal procedures and guidelines (hereinafter "**Whistleblowing**"). Legislative Decree 231/01, the Anti-bribery & corruption Policy and Guidelines of the external regulations applicable to the Group and the internal procedures and guidelines.

Pursuant to Legislative Decree No. 24 of 10 March 2023, which transposed and implemented Directive (EU) 2019/1937 in Italy, the Company has adopted a specific procedure that can be consulted on the company intranet and on the [Company Website](#).

### 1. **Data controller**

The data controller is Lottomatica S.p.A. on its own behalf and on behalf of the other companies of Lottomatica Group directly and/or indirectly controlled by it (hereinafter also "Company" or "Data Controller").

### 2. **Data Protection Officer**

The Data Controller has appointed a Data Protection Officer ("DPO") who can be contacted at [dpo@lottomatica.com](mailto:dpo@lottomatica.com)

### 3. **Origin of personal data**

The data are collected by the Data Controller through the reporting tools set out in Section 4 below, as well as through any subsequent contacts of the reporting party with the Data Controller. Moreover, following the receipt of the reports and in order to examine their grounds and acquire further elements and feedback, the Data Controller may collect further data from third parties - internal or external - from public databases, other freely accessible sources, online and offline and in general from any other source to enable the Data Controller to carry out the necessary checks for the management of the report, in accordance with the provisions of the Reporting Management Procedure.

### 4. **Categories of personal data**

The Data Controller will process data that will be communicated through one of the channels made available, namely: (i) EthicsPoint platform; (ii) dedicated telephone channel (iii) dedicated e-mail address; (iv) online forms made available under the 231 Model.

In connection with the receipt and assessment of reports, the Data Controller may process the following data:

#### **Lottomatica SpA**

Via degli Aldobrandeschi, 300, 00163 Roma, Italia  
T +39 06 898651 F +39 06 8986559 [info@lottomatica.com](mailto:info@lottomatica.com)  
Gruppo IVA 15432831004, Codice fiscale 13917321005  
Capitale sociale € 32.300.625,00 i.v. REA RM 1482648

Common personal data of whistleblowers and, where applicable, of reported persons (e.g. first name, last name, contact information).

Personal data contained in the reports (including, where applicable, data belonging to special categories pursuant to Article 9 GDPR and personal data relating to criminal convictions and offences pursuant to Article 10 GDPR).

Personal data of reported persons and of any third parties involved.

As explained in the Whistleblowing Management Procedure, the person making the report may also send reports anonymously (through the platform identified by the Data Controller and the methods made available by it to ensure anonymity): in this case, only the data provided in the report itself will be processed.

## 5. **Purposes, legal bases of the processing, storage period**

- ✓ **Purpose 1:** to implement the Whistleblowing Management Procedure and, therefore, for the purpose of carrying out the necessary investigative activities aimed at verifying the reliance of the fact being reported and the adoption of the consequent measures. Furthermore, the adoption of an internal IT reporting channel constitutes an obligation for the Data Controller pursuant to Legislative Decree No. 24 of 10 March 2023. *Legal basis of the processing:* the processing is necessary for the fulfilment of legal obligations. *Period of data retention:* for the time necessary to process the report. In any case, data shall be retained for a period not exceeding 5 years from the date of communication of the final outcome of the reporting procedure in compliance with the confidentiality obligations set out in Article 12 of Legislative Decree No. 24/23. If the data collected are clearly unnecessary or excessive for the processing of the report, they will be immediately deleted by the Data Controller.
- ✓ **Purpose 2:** purposes of judicial protection, to prevent or prosecute offences. *Legal basis of the processing:* the legitimate interest of the Controller to protect its rights and to prevent unlawful acts. *Period of data retention:* without prejudice to the above, in the event of legal proceedings, data may be processed for defence purposes until the judgment becomes final. If the data collected is manifestly unnecessary or excessive for the processing of the report, it will be immediately deleted by the Data Controller.

## 6. **Obligation to provide data and consequences of refusal**

Providing the reporting party's data is optional, since reports can be sent completely anonymously. Providing the data contained in the report is necessary, however, so that the report can be received, verified and processed.

## 7. **Persons in charge of processing the data contained in the reports**

The data contained in the reports shall be processed by the persons in charge of the relevant functions within Lottomatica S.p.A., who have been specifically appointed as persons in charge of the report management process, in order to assess whether or not the report is well-founded. In this context, the Data Controller has identified certain persons, appointed as authorised to process the data who, following specific instructions given by the Company, as well as training on whistleblowing, will be able to view and, in general, process your data, exclusively for the purposes set out in this privacy policy.

If, after preliminary verifications, profiles of relevance to the 231 Model emerge, the data will be communicated to the Supervisory Board. In the course of its activities, the Supervisory Board may process personal data, in compliance with the relevant legal obligations (Article 6(1)(c) of the Regulation), as well as judicial data (i.e. data relating to criminal proceedings and convictions) to the extent that this is necessary to fulfil a legal obligation that provides appropriate guarantees for the rights and freedoms of the persons concerned (Article 10 of the Regulation). Personal data, including judicial data, may also be processed by persons in top management and executive positions within Lottomatica S.p.A. in connection with the commission of any violations by the employees in the course of their work activity, so that appropriate measures may be taken and the Company and the other companies of the Lottomatica Group

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may pursue their legitimate interest in exercising or defending their rights in court (Art. 6, para. 1, lett. c) of the Regulation).

## **8. Communication of personal data**

For one or more of the above purposes, the Controller may share data with the following recipients:

- ✓ service providers;
- ✓ lawyers and law firms assisting the Controller;
- ✓ judicial authorities or administrative bodies.

## **9. Transfer of data outside the European Economic Area**

The data collected may be transferred outside the territory of the European Economic Area, to suppliers of services instrumental to the creation and management of reports which acts as data processors appointed by the Data Controller. Such transfer shall take place in accordance with the provisions of Articles 45 et seq. of Regulation (EU) 2016/679 according to one of the mechanisms provided for therein.

## **10. Rights of the data subject**

We inform you that, at any time, you may exercise your rights under Articles 15 - 22 GDPR by sending an e-mail to [dpo@lottomatica.com](mailto:dpo@lottomatica.com)

The exercise of these rights may be subject to limitations in the cases provided for in Article 2-undecies of Legislative Decree 196/2003, as last amended by Legislative Decree 24/2023.

In addition, we remind you that you always have the option of lodging a complaint with the Personal Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)) or with the different Supervisory Authority of the Member State of the European Union where you reside or work.

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