

NOTICE PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 – GENERAL DATA PROTECTION REGULATION Whistleblowing

On December 29, 2017, the Law no. 179 establishing “*Provisions on the whistle-blower’s protection for reports concerning crimes or irregularities, which the person has been aware during a public or private employment*” entered into force, in order to encourage the employees and consultants to make reports, to ensure the entity’s integrity, with details of circumstances concerning unlawful conducts, which are relevant pursuant to Legislative Decree no. 231/2001, or breaches of the entity’s organization and management model, which the subjects have been aware during the performance of their activities.

Lottomatica S.p.A. adopted an Organisational, Management and Control Model pursuant to Legislative Decree no. 231/2001 (hereinafter, the “**231 Model**”) in order to prevent the perpetration of crimes provided for under such decree, as well as a company’s procedure pursuant to Law no. 179/2017 to encourage the employees, directors, members of Company’s bodies and third parties which have business relations of whatsoever kind with Lottomatica Group to report any potential breach of Code of Ethics, of the Organisational, Management and Control Model pursuant to Legislative Decree no. 231/2001, to the relevant law applicable to the Group as well as the internal procedure and guide-lines (so called whistleblowing).

We wish to inform you that Regulation (EU) 2016/679 (hereinafter, the “**Regulation**”) and the relevant Italian implementing legislation establish rules on the protection of natural persons in the framework of personal data processing and safeguard the fundamental rights and freedoms of natural persons, and in particular the right to the protection of personal data. In accordance with arts. 13 and 14 of the Regulation, hereinafter we inform you of the modalities and purposes by/for which Lottomatica S.p.A. will process your personal data, in its capacity as controller. We kindly ask you to carefully read this privacy notice before supplying to us personal data that concern you or, where requested, agreeing to their processing. Please consider that this privacy notice concerns the processing of the personal data of the whistle-blower, if they will choose to be identified in the reporting phase, and of the reported person.

1. How have been my personal data supplied?

In order to apply and comply with Law no. 179/2017, the Company has established a specific procedure available on the company’s intranet and on the website <https://www.lottomaticagroup.com/governance>.

By typing the following URL <https://secure.ethicspoint.eu/domain/media/en/gui/104892/index.html>, the whistle-blower can fill a form to make a report and can choose, in such phase, to supply (or not) his identification data. In order to make a report, the whistle-blower has to necessarily provide the identification data and contact details of the reported person.

2. What are the purposes of processing my personal data?

We will process your personal data for the following purposes:

a) **To comply with legal undertakings** (art. 6, paragraph 1, let. c) of the Regulation)

We will process your personal data to comply or to obtain the compliance with specific undertakings or to perform specific tasks provided for under the relevant European Union rules, law, regulation or collective bargaining agreements also of the company, in particular in order to apply the relevant law concerning the administrative liability of the entities and of the companies.

b) **To pursue our legitimate interests in exercising or defending a right in, or outside of, court** (art. 6., paragraph 1, let. f) of the Regulation)

We will process your personal data to pursue our legitimate interests in exercising or defending a right in, or outside of, court, as well as by administrative means or through arbitration and mediation procedures in the events provided for under the relevant laws, rules both of Italy and of European Union, regulations and collective bargaining agreements, also when a breach of company’s procedure or of the Model occurs.

3. Will be my personal judicial data processed?

Yes, the employees who is in an apical or managerial position in the companies of the Lottomatica Group and the Independent Supervisory Body (“*Organismo di Vigilanza*”), a body with independent initiative and control power,

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which has to supervise the functioning of, effectiveness of and compliance with the 231 Model, can process the employees' personal data, in compliance with the relevant legal undertakings (art. 6, paragraph 1, let. c) of the Regulation), as well as the judicial data (or the ones related to criminal proceedings and sentences) to the extent that it will be necessary to comply with a legal duty providing adequate safeguard of rights and freedoms of the concerned person (art. 10 of the Regulation).

4. Is the data- supply mandatory or optional?

The data-supply is optional for the whistle-blower, instead, in relation to the reported person, his personal data-supply is mandatory, because – in case of reports without details of circumstances – the same report shall not be taken over.

5. How will be my personal data processed and for how long will be they kept?

Your personal data will be processed using both automated and non-automated instruments. Specific security measures are taken to avoid the loss of data, unlawful or improper uses and unauthorized accesses. Your personal data will be kept for 5 (five) years from the receipt of the report, without prejudice of specific judicial needs to protect the rights of the controller or the companies of Group "Lottomatica".

The reports will be confidential and will be managed in order to ensure the confidentiality of the identity of the whistle-blower and of the reported person. The Company undertakes to protect the whistle-blower from any reprisals or discriminations, direct or indirect, for reasons related to, directly or indirectly, the report.

6. Who may acquire knowledge of my personal data?

Personal data of who blew the whistle or who was indicated in the report (i.e. the identification personal data of the whistle-blower/reported person – in case they are known – and the ones related to the content of the report, including eventual judicial data on criminal proceeding and sentences) will be processed in compliance with art. 6, paragraph 1, let. c) and art. 10 of the Regulation and will be brought to the knowledge of the heads of the relevant departments of the Group "Lottomatica", in order to assess the report's validity.

Whenever, following preliminary verifications, it results that the report is relevant for 231 field, the data will be transmitted to the Independent Supervisory Board ("*Organismo di Vigilanza*"). During the performance of its own activities, the Independent Supervisory Board could process the employees' personal data, in compliance with the relevant legal undertakings (art. 6, paragraph 1, let. c) of the Regulation), as well as judicial data (or the ones related to criminal proceedings and sentences) to the extent that it will be necessary to comply with a legal undertakings providing adequate safeguard of rights and freedoms of the concerned people (art. 10 of the Regulation).

The employee's personal data, including judicial ones, could be processed also by people who is in apical and managerial positions in the companies of the Group "Lottomatica" in connection with eventual breaches of the employee carried out during his working activity, in order to take the advisable measures and to allow the company and the other companies of the Lottomatica Group to pursue its legitimate interests in exercising or defending a right in court (art. 6, paragraph. 1, let. c) of the Regulation).

7. Will be my personal data divulged to third parties?

Such personal data and documentation supporting the report could be divulged to suppliers of administrative and IT services, to lawyers, law firms and other consultants which assist the company, as well as they could be transmitted to the judicial Authority if the company considers advisable to denounce the possible breach, also to pursue its legitimate interests in exercising or defending a right in court (art. 6, paragraph. 1, let. f) of the Regulation).

8. Will be my personal data transferred outside the territory of the European Economic Area?

Yes, your personal data may be transferred outside the territory of the European Economic Area, to suppliers of IT services related to the management of the form, through which make reports.

Anyway, your personal data will be processed and transferred in compliance with current legislation, both national and European, in according to the Regulation (EU) 2016/679, as well as in compliance with the requirements of the Authority for the Protection of Personal Data by signing model clauses, provided by the Guarantor, which ensure an appropriate level of protection of your data, even if processed by subjects outside the European Economic Area.

9. What are my rights?

You are entitled to exercise - at any time, free of charge and without any formalities – the following rights set out in arts. 15 to 22 of the Regulation, pursuant to and within the limits provided for by applicable law from time to time: the right to ask to access the personal data (i.e., the right to receive from us confirmation as to whether or not a processing of data concerning you is in progress and, in this case, to gain access to the personal data - obtaining copies thereof – and to the information indicated in art. 15 of the Regulation) and to ask for the rectification (i.e., the right to obtain rectification of inaccurate data concerning you or the completion of incomplete data) or erasure thereof (i.e., the right to obtain the erasure of data concerning you, if one of the reasons set out in art. 17 of the Regulation exists) or the restriction of processing concerning you (i.e., the right to obtain, in the cases indicated in art. 18 of the Regulation, the marking of the preserved data, with a view to restricting their processing in future), as well as the right to portability of the data (i.e., the right, in the cases set out in art. 20 of the Regulation, to receive from us, in a structured, commonly used and machine-readable format, the data concerning you, and also to transmit such data to another controller without hindrance). Furthermore, you are entitled to withdraw your consent at any time. The withdrawal of consent does not compromise the lawfulness of processing based on the consent given prior to the withdrawal. We remind you that you can always lodge a complaint either with the personal data protection Regulator (www.garanteprivacy.it) or with the different supervisory Authority of the European Union Member State where you live or work.

Please consider that, in order to protect the identity of the whistle-blower, the employee or the different person involved in the report is not entitled to exercise his rights pursuant to the Regulation, when such rights' exercise can allow to identify the whistle-blower.

10. Does the Regulation also acknowledge my right to oppose the processing?

Yes. You are entitled to oppose at any time – for reasons inherent in your particular situation – the processing of personal data concerning you, within the meaning of article 6, paragraph 1, letters e) or f) of the Regulation, including profiling, in accordance with these provisions. In cases where the personal data are processed for direct marketing purposes, you are entitled to oppose at any time the processing of personal data concerning you that is carried out for such purposes, including profiling, in so far as this is inherent in such direct marketing.

11. How can I contact you and exercise my rights?

Requests to exercise your rights, as indicated above, may be submitted by email to the address privacy@lottomatica.com

12. How can I contact your Data Protection Officer (DPO)?

The DPO can be contacted by email to the address dpo@lottomatica.com