

WHISTLEBLOWING PRIVACY POLICY

Pursuant to Article 13, Regulation (EU) 2016/679 (the “Regulation” or “GDPR”)

Please be informed that Automobili Lamborghini S.p.A. (“Lamborghini”), in its quality of data controller, will process your personal data on the basis of logics and procedures consistent with the purposes indicated below and in compliance with EU Regulation 2016/679 (General Data Protection Regulation, the “GDPR”).

Reports of crimes or irregularities can be made anonymously. However, if you, as a whistleblower, decide to provide your personal data in the context of a report, for the sole purpose of managing such report and the related investigations, Lamborghini may process the following categories of data, in addition to any further personal data that you send to Lamborghini as part of the report:

- personal and identification data (e.g., name, surname);
- contact details (e.g. address, e-mail address, telephone number).

Depending on the report received and the subject of the subsequent investigation, Lamborghini may also process special categories of personal data concerning you.

Lamborghini undertakes to ensure that the data processed is adequate, relevant and limited to what is strictly necessary to achieve the purposes indicated below.

Purposes and legal bases of the processing

Lamborghini collects and processes the personal data you provide for the sole purpose of managing whistleblowing reports, in accordance with the provisions in force and, in particular, with Directive (EU) 2019/1937 as implemented in Italy by the Italian Legislative Decree 24/2023 (the “Whistleblowing Legislation”).

The processing of your personal data will be based on the need to comply with a legal obligation and, in particular, with the Whistleblowing Legislation, as well as on the legitimate interest of the Data Controller in managing whistleblowing reports. In addition, if special categories of personal data are processed, the processing will be based on the legal bases set out in Article 9(2)(b) and (f) of the GDPR.

Should the need arise to reveal your identity as a whistleblower to persons other than those competent to receive or manage reports, in any case expressly authorized and instructed to process such data, your free and specific consent will be acquired in advance for this purpose, in compliance with the provisions of Article 12(2) of the Italian Legislative Decree 24/2023.

The processing may also concern the identity of the whistleblower in the context of the disciplinary procedure and is governed by Article 12(5) of the Italian Legislative Decree 24/2023, pursuant to which the identity of the reporting person cannot be revealed, where the objection to the disciplinary charge is based on separate and additional investigations with respect to the report, even if consequent to the same. Your specific consent to the disclosure of your identity will be required to use your report for the purposes of disciplinary proceedings if the complaint is based, in whole or in part, on the report, and knowledge of the identity of the reporting person is essential for the defense of the person subject to the disciplinary proceeding.

Reports received during a face-to-face meeting will be transcribed and entered on the platform only with your consent, to guarantee their confidentiality.

Methods of processing and storage of personal data

Lamborghini processes your personal data within the European Union with and without the electronic tools and in any case in compliance with the security requirements required by applicable laws.

Your personal data will be stored for the time strictly necessary to achieve the purposes for which they were collected and for the fulfilment of applicable legal and regulatory obligations, in any case not less than 5 years from the reporting date, in case of a groundless report, or 10 years from the end of the investigations, in all other cases. The data will be either deleted or permanently anonymized at the end of the retention period, unless Lamborghini is required to retain the data for a longer period to comply with legal obligations.

Disclosure of your personal data to third parties

For the performance of certain activities subject to processing, the data may be communicated to third parties, who will process the data as independent data controllers or data processors and, in particular:

- i. Audi Investigation Office, manager of the Speak Up Platform used by Lamborghini to receive and manage reports;
- ii. Entities who carry out control and auditing activities, law firms and consulting firms, IT service providers, investigative agencies;
- iii. Entities to whom the right to access the data is provided for by law (e.g. public authorities and police forces).

Your personal data will be communicated to the Chief Compliance Officer as the person authorized to process it.

Your personal data will not be disseminated.

Data Controller and Data Protection Officer

The Data Controller is Automobili Lamborghini S.p.A., with registered office in via Modena 12, Sant'Agata Bolognese (BO), Italy. The Data Protection Officer is domiciled at Lamborghini's headquarters and can be contacted at the email address dpo@lamborghini.com.

Your rights

You can contact Lamborghini, at the addresses mentioned above, or the Data Protection Officer to exercise at any time the rights referred to in Articles 15-22 of the GDPR, including obtaining confirmation of the existence of your data, verifying its content, origin, accuracy, requesting integration, updating, rectification, cancellation, anonymization, requesting data portability, limitation of processing, objection to processing for legitimate reasons. You have the right to withdraw your consent at any time, as well as to lodge a complaint to the Supervisory Authority (the Italian Data Protection Authority).