

PRIVACY POLICY

Dear Mr./Ms.,

this information notice intends to inform You about the processing of personal data performed to manage reports of circumstances related to unlawful behavior under the European Whistleblowing Directive 2019/1937 ("**Reports**"), submitted through the internal reporting channels made available within the Ermenegildo Zegna Group, including written, oral and in-person reporting channels, as better described in the applicable Misconduct Reporting Policy.

1) Data Controller and Data Processor

The data controller is the company belonging to the **Ermenegildo Zegna Group**, whose list is reported in the Annex 1 below, to which the report and notification refer, and which will therefore proceed with its management, either directly or through third parties delegated for this purpose, as specified below (hereinafter as the "**Data Controller**").

Furthermore, the parent company Ermenegildo Zegna N.V has been appointed by each of the Ermenegildo Zegna Group companies as data processor pursuant to Article 28 of the European Regulation 2016/679 and will process personal data on behalf of and under the instructions of the relevant Data Controller for the operational management of the Reports and system.

2) Purpose and legal basis of the processing

The information acquired in the context of the channel of communication, including written reporting systems, oral reporting channels (such as voice reporting systems or telephone hotlines) and, when requested by the reporting person, through in person meetings, will be processed in line with the laws related to the protection of data and confidentiality obligations, for the following purposes ("**Purposes**"): receipt, processing and management of Reports, necessary to (i) fulfill of any legal obligations under national or / and U.S. and European laws or regulations, to which the Data Controller is subject as well as by provisions ordered by Authorities legitimated by the law and / or by Supervisory and control bodies; (ii) perform internal audit activities.

The legal basis of the processing activities lies in legal obligations of the Company, as well as in the legitimate interest of the latter in (i) investigating any circumstances and behaviors that can result to be not in line with the ethics values of Ermenegildo Zegna Group and the applicable local equal opportunity and discrimination legislation, and (ii) preventing behaviors and criminal offences or granting security of networks and information. If Your local mandatory law does not consider as a valid legal basis the fulfilment of the foreign law and/or legitimate interest of the Company, the latter will request Your prior consent as a basis for the processing of Your personal data.

If, moreover, Your consent is required by the regulation in force in your country for the transfer of your Personal Data across borders, it will be requested before sending the Report.

3) Categories of data, source of data and method of processing

For the abovementioned purposes, Your personal data, including name, position held, contact details and data belonging to special categories such as those related to health status, religious beliefs and judicial ones, may be processed. Please note that personal data may be provided to the Data Controller directly by You when submitting a report, but may also be disclosed by a whistleblower within a report submitted by the same.

The processing of Your personal data for the purposes mentioned above is carry out using mainly automated methods (electronic support), in compliance with the rules of confidentiality and security provided for by law, by regulations and specific internal provisions. Personal Data may also be processed through oral reporting channels (including voice reporting systems or telephone hotlines) and, where requested, through in person in person meetings, in accordance with the Misconduct Reporting Policy and applicable data protection laws.

4) Mandatory or optional nature of the provision of data

The provision of Your data is not necessary; Reports, in fact, can be submitted anonymously. It is recommended therefore to only indicate Data that are extremely necessary for the report and to leave out further data that are not pertinent and excessive. In particular, it is strongly recommended to leave out data belonging to special categories (for instance data related to health, sexual orientation and/or religious beliefs) where not strictly related to the Report.

5) Data retention period

Data related to Reports will be processed for the time strictly necessary to manage them and for any further activities related to the legal protection of subjects involved and obligations of the Data Controller under the applicable local regulation applied to the Data Controller.

6) Categories of recipients who may have access to the data

The categories of recipients listed below may have access to your personal data: (i) Ermenegildo Zegna N.V. as appointed data processor for the management of the activities related to the reports; (ii) other service providers (services related to the management of the reports/technological platform), (iii) internal functions and authorized personnel within the Ermenegildo Zegna Group involved in the management of Reports, including members of the Ethics Committee, Internal Audit, and depending on the nature of the report, the Human Resources and/or Legal functions, duly authorized to process personal data; (iv) external consultants (such as technical consultants and lawyers, doctors, etc.) and subjects who are part of Supervisory Board or any other control bodies appointed by the Data Controller; (v) companies of the Ermenegildo Zegna Group and related companies as well as supervisory bodies depending on local applicable laws; (vi) Authorities, Police Forces, Entities and Public Bodies, for the performance of their respective institutional functions, within the limits established by law and applicable regulations. The above-mentioned parties will act as appointed Data Processors or as autonomous Data Controllers.

Your personal data will also be disclosed to the employees of the Data Controller, specifically appointed as authorized subjects, where necessary for the Purposes referred to in Paragraph 2 of the present Policy, who act in the capacity of subjects authorized by the Data Controller to carry out certain activities related to the role covered and to the function they have within the Company's internal structure. The recipients or Your Personal Data shall act in accordance with the instructions provided by the Controller as well as the provisions of the applicable laws respecting security measures, protection and safeguard of data.

7) Data transfer

The data will be processed mainly in Italy, Europe and UK. However, they could also be transferred to countries outside the European Union, including US, always granting adequate protection and safeguard of data, in accordance with the provision of the European Regulation 2016/679 (hereinafter also referred to as the "**Privacy Regulation**"), through the use of the Standard Contractual Clauses approved by the European Commission and through further safeguards, as set out in Art. 45 ss of the Privacy Regulation. It is however always possible to contact the Data Controller to obtain further information related to the location of Your Data, writing to the relevant address.

Your data will not be disseminated in any way.

8) Rights of the data subject

Please note that the applicable laws grant You several rights, including the right: (i) to access to Your personal data, to obtain information about the data processed, the purposes and methods of processing; (ii) to obtain the rectifications and updating of data, (iii) to request the deletion or restriction of the processing of Your data; (iii) to object to the processing of Your data for legitimate purposes as well as to exercise Your right to data portability and deletion, where possible; (iv) to withdraw Your consent previously given.

To exercise these rights, you may contact the Data Controller at the address indicated in the Annex 1 below, or by writing at privacy@zegna.com (the same email address can be also used to contact the Data Protection Officer appointed by EZ Service S.r.l.). Please note that the Data Controller reserves the right, within the limits of the applicable law, to restrict the above-mentioned rights to comply with the applicable reporting legislation and to protect both the identity and confidentiality of the reporting party.

Please also note that it is always possible to lodge a complaint with the competent Supervisory Authority if You believe that the processing of Your Personal Data violates privacy legislation. To facilitate the exercise of the right to complain, the name and contact details of the EU Supervisory Authorities are available at the following link: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

Annex 1 - Ermenegildo Zegna Group list of companies

COMPANY'S NAME	ADDRESS
Acquedotto Piancone S.r.l.	VIA ROMA 99 cap 13835 VALDILANA (BI), Italy
Bonotto S.p.A.	VIA LOUVIGNY 39/A cap 36064, COLCERESA (VI), Italy
Cappellificio Cervo S.r.l.	VIA TRIESTE 13, 13900 BIELLA, Italy
Co.Ti. Service S.A.	Via Ligornetto 13, 6855 Stabio, Switzerland
Consitex S.A.	Via Ligornetto 13, 6855 Stabio, Switzerland
Consorzio Re.Crea	VIA ANGELO SCARSELLINI 11/13 cap 20161, MILAN (MI), Italy
Ermenegildo Zegna New Zealand LTD	Shop S134 Westfield Newmarket, 277 Broadway Newmarket, Auckland, New Zealand
E. Z. Thai Holding Ltd	725 S-Metro Building, 20th Floor, Sukhumvit Road, Klongtan Nue, Wattana, Bangkok 10110, Thailand
E.Z. Trading (Hong Kong) LTD	Suite 1020-1021A, 10/F Ocean Centre, Harbour City, 5 Canton Raod, Tsim Sha Tsui, Kowloon, Hong Kong
E.Zegna Attica Single Member Societé Anonyme	10673 Athens - Solonos Street, 10, Greece
Ermenegildo Zegna (China) Co., LTD	50/F, One Lujiazui, 68 Middle Yincheng Road, SHANGHAI 200120, China
Ermenegildo Zegna (Macau) LTD	Suite 1020-1021A, 10/F Ocean Centre, Harbour City, 5 Canton Raod, Tsim Sha Tsui, Kowloon, Hong Kong
Ermenegildo Zegna Australia PTY LTD	C/- TMF CORPORATE SERVICES (AUST) PTY LIMITED SUITE 1, LEVEL 11 66 GOULBURN STREET SYDNEY NSW 2000, Australia
Ermenegildo Zegna Canada Inc.	PO Box 30046 - Markham RPO Boxgrove, Ontario - L6B 0R5, Canada
Ermenegildo Zegna Corporation	80 State Street, Albany, NY 12207, USA
Ermenegildo Zegna Czech s.r.o	Pařížská 126/18, Josefov, 110 00 Praha 1, Czech Republic
Ermenegildo Zegna Denmark ApS	Hack Kampmanns Plads 2, 8000 Aarhus C. Denmark
Ermenegildo Zegna Far-East Pte LTD	435 Orchard Road #19-06 Singapore 238877
Ermenegildo Zegna Giyim Sanayi ve Tic. A. S.	İc.k.no:4671 İstinye Park Avm No:11/İ Pinar Mahallesi Katar Caddesi Sariyer Istanbul; Marmara; Postal Code: 34460, Turkey
Ermenegildo Zegna GmbH	80539 Munich - Maximilianstrasse 25, Germany
Ermenegildo Zegna H.m.b.H.	1010 Wien - Tuchlauben 7 Shop 10, Austria
Ermenegildo Zegna Hong Kong LTD	Suite 1020-1021A, 10/F Ocean Centre, Harbour City, 5 Canton Raod, Tsim Sha Tsui, Kowloon, Hong Kong
Ermenegildo Zegna Korea LTD.	(Cheongdam-dong, W Tower), 16th Floor, 701, Yeongdong-daero, Gangnam-gu, Seoul, South Korea
Ermenegildo Zegna Malaysia Sdn. Bhd.	Unit c-12-4, Level 12 Block C, Megan Avenue II 12, Jalan Yap Kwan Seng 50450 Kuala Lumpur Malaysia
Ermenegildo Zegna Maroc S.A.R.L.A.U.	20110 Casablanca - Centre d'affair Contempo 71 angle Blvd Mohamed V e Rue Azilal, Morocco
Ermenegildo Zegna Monaco S.a.r.l.	7, Avenue de Spélugues 98000, Principauté de Monaco, Monaco
Ermenegildo Zegna S.A. de C.V.	Bldv. Manuel Avila Camacho 40, Int. 1903. Col. Lomas De Chapultece Iii Sección, Alcaldía Miguel Hidalgo, C.P. 11000, Ciudad De México
Ermenegildo Zegna Vietnam LLC	3rd Floor, Savina Building, 1st Dinh Le Street, Trang Tien Ward, Hanoi, Vietnam
EZ CA Holding Corp.	66 Wellington Street, Suite 5300, TD Bank Tower, Toronto ON, Canada
EZ Service S.r.l.	VIALE ROMA 99/100, 13835 VALDILANA (BI), Italy
Ezesa Brasil Participacoes LTDA	Rua Doutor Renato Paes de Barros, 778 - 6º Andar CJ 61 - CEP 04530-001 - São Paulo/SP - Brasil
Ezeti Portugal. S.A.	1250-141 - Avda Da Libertade 177/177 A, Lisbon, Portugal
Ezeti S.L.	08007 Barcelona - Calle Diputación n.260 5ªPlanta, Spain
Ezi S.p.A.	VIA VITTOR PISANI 16, 20124 MILAN, Italy
F2 S.r.l.	VIA LAGO MAGGIORE 32 cap 36015, SCHIO (VI), Italy
Fantasia (London) Limited	37 New Bond Street, London, W1S 2RU, UK
Filati Biagioli Modesto S.r.l	VIA ANTONIO GRAMSCI 155 cap 51037 stradario 00470, MONTALE (PT), Italy
Gruppo Dondi S.p.A.	CARPI (MO) VIA BUDRIONE MIGLIARINA PARTE EST 2/A CAP 41012 FRAZIONE: FOSSOLI, Italy
In.co. S.p.A.	Viale Roma 99/100 - Loc. Trivero 13835 Valdilana (BI), Italy
ISMACO TEKSTİL LİMİTED ŞİRKETİ	İstanbul Endüstri ve Ticaret Serbest Bölgesi Aydınlı SB Mah. 10. Sok. No:1/Z01 Tuzla - Istanbul, Turkey
Italco S.A.	CALLE DIPUTACIÓN, NR. 260 - 08007 BARCELONA, Spain
Lanificio Ermenegildo Zegna e Figli S.p.A.	VIALE ROMA 99/100 cap 13835, VALDILANA (BI), Italy
Luigi Fedeli e Figlio S.r.l.	Via Arosio 4, 20900 Monza (MB), Italy
Norda Run Inc	3250 Chemin Curtis, Barnston West, QC JOB 1C0, Canada
Pettinatura di Verrone S.r.l.	VERRONE (BI) STRADA TROSSI 2 cap 13871, Italy
Sharmoon.EZ.Garments Co. Ltd	646 Airport Road, Wenzhou, Zhejiang, 325000, China
Société de Textiles Astrum France S.à.r.l.	75008 Paris - Avenue George V, 39, France
Tessitura Ubertino S.r.l.	VIA DIAGONALE 327 CAP 13835, VALDILANA (BI), Italy

The Italian Fashion Co. LTD	991 Siam Paragon Shopping Center, Main Floor, Unit M10 Rama 1 Road, Phatumwan, Phatumwan, Bangkok Thailand 10330
Thom Browne (China) Co., Ltd	Room 223, Floor 2, Building 1, No 757 Jiao Zhou Road, Jing 'an District, SHANGHAI
Thom Browne (Macau) Limited	Suites 1020-21A, 10th Floor, Ocean Centre, Harbour City, Tsim Sha Tsui, Kowloon, Hong Kong
Thom Browne Canada	800 - 885 WEST GEORGIA STREET Vancouver BC V6C 3H1, Canada
Thom Browne Eyewear (T.B.E.) SA	Via Ligornetto 14, 6855 Stabio, Switzerland
Thom Browne France Services	5, Rue de Castiglione 75001 PARIS, France
Thom Browne Hong Kong Limited	Suites 1020-21A, 10th Floor, Ocean Centre, Harbour City, Tsim Sha Tsui, Kowloon, Hong Kong
Thom Browne Inc.	1209 Orange St., Wilmington, New Castle, DE, 19801, USA
Thom Browne Japan Inc.	Bleu Cinq Point A-3 2F 5-3-22, Minami-Aoyama, Minato-Ku Tokyo, 107-0062, Japan
Thom Browne Korea Ltd.	Suite 516, 145 Dosan-daero, Gangnam-gu, Seoul, South Korea (Sinsa-dong, Inwoo Building)
Thom Browne Retail Italy S.r.l.	Via Gesu'10, 16, 20121, Milan, Italy
Thom Browne Services Italy S.r.l.	Corso Venezia, 16 - 20121 Milan, Italy
Thom Browne Trading SA	Via Ligornetto 14, 6855 Stabio, Switzerland
Thom Browne UK Limited	High Street Centre, 137-139 High Street, Beckenham, Kent, England BR3 1 AG, UK
Tizeta S.r.l.	SESTO FIORENTINO (FI) VIA DELLE CALANDRE 36 cap 50019, Italy
Tom Ford Clothing Retail Shanghai Company Limited	Room 4209, CITIC Square, 1168 West Nanjing Road, Shanghai 200041, China
Tom Ford Distribution S.r.l.	Via delle Calandre 36, 50019 Sesto Fiorentino (FI), Italy
Tom Ford Hong Kong Limited	Suites 3307-8 Tower One, Times Square, 1 Matheson Street, Causeway Bay, Hong Kong
Tom Ford International LLC	595 Madison Avenue, 18th Floor, New York, NY 10022, USA
Tom Ford Retail Hong Kong Limited	Suites 3307-8 Tower One, Times Square, 1 Matheson Street, Causeway Bay, Hong Kong
Tom Ford Retail Japan GK (Godo Kaisha)	4-2-8 Shibuya Shibuya-ku Tokyo, Japan
Tom Ford Retail Korea (Yuhan Hoesa)	2F 5 GANGNAMDAE-RO 107 GIL SEOCHO-GU, SEOUL, South Korea 06524
Tom Ford Retail LLC	595 Madison Avenue, 18th Floor, New York, NY 10022, USA
Tom Ford Retail UK Limited	111 Park Street, Mayfair, London, United Kingdom, W1K 7JF, UK
Tom Ford Showroom Limited	111 Park Street, Mayfair, London, United Kingdom, W1K 7JF, UK
Tom Ford Studio Limited	111 Park Street, Mayfair, London, United Kingdom, W1K 7JF0, UK
Tom Ford Switzerland Sagl	c/o Lardi & Partners SA -Via Cantonale 19 -6900 Lugano, Switzerland
Zegna (China) Enterprise Management Co., Ltd.	50/F, One Lujiazui, 68 Middle Yincheng Road, SHANGHAI 200120, China
Zegna Consitex Arabia For Trading LLC	3620, King Abdullah Road, 6414 12271 Riyadh, Kingdom of Saudi Arabia
Zegna for Retail of Readymade and Novelty Clothes W.L.L.	The Avenues Mall, Ghazali St, Al-Rai, Kuwait City, Kuwait. Unit E012
Zegna Gulf Trading LLC	1503 Nassima Tower, Shiekh Zyed Road, Trade Centre 1, Dubai, United Arab Emirates
Zegna Japan Co., LTD	Toranomon Twin Bldg Annex 2-10-1 Toranomom, Minato-Ku Tokyo, Japan. 105-0001
Zegna South Asia Private LTD	4th Floor, Court House, Lokmanya Tilak Marg, Dhobi Talao, Mumbai MH 400002, India
Thom Browne Eyewear France SpAS	5 Rue Castiglione 75001, Paris, France
Ermenegildo Zegna GmbH - Netherland branch	Westerdoksdiijk 4231013 BX Amsterdam, The Netherlands
E.Z. Trading (Hong Kong) LTD - TAIWAN BRANCH	No.390-5, Guangfu S. Rd., Da'an Dist., Taipei City 106, Taiwan
Lanificio Ermenegildo Zegna e Figli S.p.A. - KOREAN BRANCH	SEOUL 10/F WOONAM BLDG.7BONGLAI-DONG 1-GA, South Korea
Tom Ford Distribution - French branch	34 boulevard des Italiens, 75009 Paris, France