



TITLE
WHISTLEBLOWING

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<p>.....Signature/Date</p>	
<p>Reviewed by Barbara Regonini, Finance Director</p>	<p>DocuSigned by: <i>Barbara Regonini</i> F6D8D5BC13D2447...Signature/Date</p>
<p>Approved by Pierluigi Paracchi, CEO Management:</p>	<p>Firmato da: PIERLUIGI PARACCHIEDABBB17C210458.....Signature/Date</p>

TABLE OF CONTENTS

PAGE

1. PURPOSE 3

2. SCOPE..... 3

3. RESPONSIBILITY 4

 3.1 Genenta Science Responsibility..... 4

 3.2 Whistleblowers Responsibility 4

4. BACKGROUND 4

5. POLICY 4

 5.1 Events that can be reported 4

 5.2 Events that cannot be reported..... 5

 5.3 Internal channel: The Syntrio Case Management System (CMS) software tool..... 5

 5.4 Roles..... 6

 5.5 Standards of behavior expected of employees 7

6. PROCESS..... 7

 6.1 Management of the whistleblowing report 7

 5.6 Grievances / Bullying and Harassment Complaints 7

7. PROTECTIONS 7

 7.1 Confidentiality 7

 7.2 Ban of retaliation..... 8

8. ADDITIONAL GENERAL WHISTLEBLOWING POLICY INFORMATION 8

 7.1 Duty to inform 8

 8.2 Data Storage 8

 8.3 Anonymous reports..... 9

 8.4 Unfounded report upon the outcome of the investigation 9

 8.5 Well-founded report upon the outcome of the investigation 9

 8.6 Security and Identification 9

 8.7 Confidentiality and data protection 9

 8.8 Information needed to give when making a report..... 9

9. DISCIPLINARY SANCTIONS..... 10

10. REVIEW AND REVISIONS 10

11. REASON FOR CHANGE 10

12. PREVIOUS HISTORY OF POLICY 10

13. REFERENCES..... 10

Annex 1: Using the Lighthouse Anonymous Reporting App 12

Effective Date: June 5, 2025

GEN-CORP-POL-008 v3.0

1. PURPOSE

Whistleblowing regulations are designed to protect those individuals who report violations of national or EU law provisions of which they have become aware of and which are attributable to a particular company. To this end, Legislative Decree No. 24/2023 (“**Whistleblowing Decree**”) imposes certain obligations on companies to ensure the effectiveness of the protection afforded to workers and third parties.

The purpose of this Policy is to support a comprehensive set up of whistleblowing system including functionality description and operating procedure.

In accordance with the Whistleblowing Decree, Genenta Science S.p.A. (hereinafter the “**Company**” or “**Genenta Science**”) objectives expected to be achieved by the Whistleblowing System implementation are:

- To detect and prevent misconduct and breaches of laws and regulations,
- To improve law enforcement by establishing effective, confidential and secure reporting channels to effectively protect whistleblowers from fear of retaliation,
- To protect and enable whistleblowers by helping them to raise concerns confidently without fear of retaliation .

2. SCOPE

The Whistleblowing System protection not only applies for employees who report their concern, or job applicants, *stageurs*, volunteers, or former employees, but it applies broadly for all Company’ stakeholders.

“**Stakeholders**” A stakeholder has an interest in a company and can either affect or be affected by a business’ operations and performance. Typical stakeholders other than employees are investors, customers, suppliers, contractors or sub-contractors.

In addition, reports may be also presented by shareholders, directors, audit committee, supervisory body, as well as any other individual with representation, management or control function over the Company, even “*de facto*”.

Finally, reports may be presented also during the selection process, the employment probation period, or even after the termination of employment. In the latter case, the information about the violations must have been obtained before the termination of employment.

All the above subjects are referred to in this Policy as the “**Whistleblowers**”.

“**Protection**” applies to reports of wrongdoing relating to EU applicable law (Directive (EU) 2019/1937 of the European Parliament), Italian applicable law (Legislative Decree No. 24/2023) and, such as tax fraud, money laundering or public procurement offences, product and road safety, environmental protection, public health and consumer and data protection.

Effective Date: [June 5, 2025](#)

GEN-CORP-POL-008 v3.0

3. RESPONSIBILITY

3.1 Genenta Science Responsibility

Genenta Science is responsible to have adopted an organization and management model named “Genenta Organization and Management Model 231”, the “Model 231”, together with the “Code of Ethics” and “Conduct Code” to prevent certain crimes for which the Company can be held liable.

Genenta Science is also responsible to have appointed the Supervisory Body (“Organismo di Vigilanza” or “ODV”) to oversee the Model 231 application and continuous improvement and update.

In light of the above, pursuant to Whistleblowing Decree, Genenta Science shall implement a suitable whistleblowing system.

In doing so, Genenta Science has deemed appropriate to engage a third party authorized service provider with the proper standing and broad experience to manage the whistleblowing process and has determined the “most suitable” subjects to receive and follow up on reports as set forth in the Roles section.

3.2 Whistleblowers Responsibility

People who believe they are aware of any violation regarding Legislative Decree No. 231/2001 or the Model 231, as well as any other policy, procedure, control implemented by the Company (e.g. the Conduct Policy) are expected and encouraged to report their concerns.

Whistleblowers shall contact Lighthouse Services, by the Whistleblowing System Syntrio. Such reports are made confidentially.

Whistleblowers should understand, however, that nothing in this policy (nor any other Genenta Science policy or agreement) limits, impedes, or restricts an employee's ability to contact, report to, or file a charge or complaint with, the U.S. Securities and Exchange Commission, any other U.S. federal, state, or local government agency or commission or any European Union or Republic of Italy government agency or commission (“Government Agencies”). This policy also does not limit their ability to participate and/or assist in any investigation or proceeding that may be conducted by any Government Agencies, including providing documents or other information without notice to the Genenta Science. Nothing in this policy limits Whistleblowers’ right to seek and/or receive an award for information provided to any Government Agencies or prohibits you from providing truthful information in response to a subpoena or other legal process.

4. BACKGROUND

Whistleblowers are vital for maintaining an open and transparent society, as they expose misconduct or hidden threats. To ensure that they are better protected against negative consequences, Genenta Science established this whistleblower hotline in compliance with Whistleblowing Decree, through Lighthouse Services LLC, Inc..

5. POLICY

5.1 Events that can be reported

Genenta Science has established this policy for a specific purpose to report potential violations, conducts, acts or omissions, consisting of unlawful conduct relevant under Italian Legislative Decree 231/2001 (including corruption, fraud against the Public Administration, commercial bribery, cybercrimes, market abuse, fiscal or environmental offenses, etc.), or violations of the Model 231 of

Effective Date: [June 5, 2025](#)

GEN-CORP-POL-008 v3.0

the Company, as well as its internal procedures, policies, guidelines (e.g. Conduct Policy).

5.2 Events that cannot be reported

This policy is NOT a substitute for routine communications within Genenta Science organization between employees and their supervisors and managers, particularly as to workplace duties. Likewise, it does not replace communications about benefit issues or other personal job related issues.

This policy cannot be used to report events leading to an imminent threat to life or property. Reports submitted through this service may not receive immediate response. If assistance in an emergency is needed, please do not hesitate to contact the competent authorities and bodies.

For any doubts or requests for clarification about the scope of the policy, please refer to the Supervisory Body (ODV) by the means included in the Model 231 adopted by the Company.

5.3 Internal channel: The Syntrio Case Management System (CMS) software tool

Genenta Sciences implemented suitable reporting channels, after proper information to the trade unions, in accordance with Whistleblowing Decree, that ensure (also by encryption tools) the **confidentiality of the identity** of the Whistleblower, the reported person, any person mentioned in the report as well as the **content of the report** and related **documentation**.

The CMS is a software that serves as a tracker and storage system for all the hotline reports and serves also to manage hotline activity and investigations. The CMS is part of the Syntrio platform provided as web service to Genenta Science SpA by Lighthouse Service LLC. The system can track every issue from report receipt through resolution, optimizing investigations, reducing administrative oversight, ensuring due diligence and creating an audit trail.

The CMS grants freedom of forms, since reports can be made either in **writing** (including by computer) or **orally**, via telephone lines or voice messaging systems, or even in a **face-to-face meeting** if the whistleblower so wishes.

Whistleblowers are encouraged to use the internal channel as a priority.

Whistleblowers can access via:

- **Website:** <https://www.lighthouse-services.com/genenta>
- **Anonymous Reporting App: Keyword: genenta**
 - Detailed instructions [here](#) (CTRL + clic to open the link)
- **Toll-Free Telephone:**
 - Direct Dial**
 - **English speaking USA and Canada: 833-950-4534**
 - Spanish speaking USA and Canada: **800-216-1288**
 - French speaking Canada: **855-725-0002**
 - Spanish speaking Mexico: **01-800-681-5340**
 - AT&T USA Direct**
 - **All other countries: 800-603-2869** (must dial country access code first [click here](#) (CTRL + clic to open the link for access codes and dialing instructions) -> [Worldwide Calling Instructions and Access Codes](#))

On first access, the whistleblower must read a document explaining how the whistleblowing software

Effective Date: [June 5, 22025](#)

GEN-CORP-POL-008 v3.0

works. **See Annex 1 of this Policy.**

In the event that the report is submitted to the wrong recipient by incorrect means, the protections provided for in the Whistleblowing Decree is applicable to the Whistleblower only if the report is explicitly labeled as whistleblowing report, or if such intention can be inferred from the content of the report.

In such cases, the individual receiving the report is responsible for forwarding it to the Whistleblowing Team within seven days of receipt. The Whistleblower should be informed of the forwarding within the same time frame. In any case, the confidentiality of all parties' identities and the protection of their data will be maintained at all times.

5.4 Roles

The report is received and managed by the Whistleblowing Committee, who is composed by the Supervisory Board members and the Audit Committee President. Each of them has a specific role, as detailed below:

Designated Recipients – All reports are addressed to the designated recipients who are the chairman and the external member of the Supervisory Body (ODV) of the Company(ODV);

Case Management System (CMS) Administrator - The CMS Administrator has unrestricted access to Genenta Science entire online database and is responsible for updating information related to the database. In addition, he/she also assigns reports to CMS Investigators and add new users. The CMS Administrator is the Chairman of the Supervisory Body;

Case Management System (CMS) Investigator – The Investigator has limited access to the CMS and can investigate, track progress, dialog, and upload files to reports he has been assigned by the Administrator. The CMS Investigator is the Audit Committee President. The Investigator has also the task to

- make himself available for those who are involved in an investigation;
- advise employee when and if appropriate, that they are subject to investigation and why this is the case
- keep Whistleblowers fully informed on progress relating to the investigation;
- feedback the outcome of the investigation to the reporting person and offer appropriate support;
- summarize the investigation results to the Designated panel of subject that must decide on the corrective measures to be taken if applicable.

The Whistleblowing Committee may also decide to ask an external consultant to conduct the investigations related to the report. In any event, confidentiality of the identity of the Whistleblower, the reported person, people mentioned in the report, and the content of the report will always be granted.

If a member of the Whistleblowing Committee is in a potential conflict of interest (for example, if they are the Whistleblower, the reported person, or a person involved or affected by the report), they will refrain from handling the report, which will be handled by other members of the Whistleblowing Team. Even in these cases, the report will be handled with complete confidentiality regarding the identity of the whistleblower, of the person reported, those mentioned in the report, and the content of the report.

Effective Date: [June 5, 2025](#)

GEN-CORP-POL-008 v3.0

5.5 Standards of behavior expected of employees

The employee's reaction to a particular situation in the workplace is one of the top factors that create a positive work environment. And like all other skills and potentials, good behaviors get the best from the employees.

Genenta Science **Code of Ethics and the Conduct Policy** summarize expected ethics principles behaviors for all employees to be applied in all department or business unit.

The Company has adopted **The Organization, Management and Control Model** pursuant the Italian Legislative Decree 231/01 (**Model 231**) to prevent its liability in case of relevant crimes identified in this document.

All those behaviors that subject the Company to such risks are considered **misconducts** that should be reported and that determines the application of the **Disciplinary Code**.

6. PROCESS

The Whistleblowing Committee will:

- notify the whistleblower of the receipt of the report within 7 days from such receipt;
- liaise with the Whistleblower and ask for additional information, if necessary;
- diligently follow up on reports received;
- carry out the necessary preliminary investigations to follow up the report, including hearings and obtaining documents;
- provide feedback to the whistleblower within 3 months or, if there are valid and substantiated reasons, within 6 months from the date of acknowledgement of receipt;
- inform the Whistleblower of the final outcome of the report.

6.1 Management of the whistleblowing report

The whistleblowing report will be managed in accordance with Annex 1 of the **Investigation Policy**.

5.6 Grievances / Bullying and Harassment Complaints

If the reported person raises a grievance or bullying and harassment complaint during the conduct process, the process may be temporarily suspended in order to deal with the grievance or complaint. Where the grievance or complaint and matters under consideration are related, it may be appropriate to deal with both issues at the same time.

Complaints of bullying and harassment during the conduct process, or at the end of that process, must also be reported using the channels outlined in this policy. The Recipient will then be required to manage them with the same guarantees provided in this policy.

7. PROTECTIONS

7.1 Confidentiality

The identity of the Whistleblower must not be disclosed to anyone other than those responsible for receiving or following up the report.

The protection covers not only the name of the Whistleblower, but also all elements of the report from

Effective Date: **June 5, 2025**

GEN-CORP-POL-008 v3.0

which the identification of the Whistleblower can be inferred, even indirectly.

The report is excluded from the right of access to administrative acts and the general right of access of citizens.

The protection of confidentiality extends to the identity of the persons involved and of the persons mentioned in the report, until the conclusion of the procedure initiated on the basis of the report, with the same guarantees provided for the benefit of the Whistleblower.

7.2 Ban of retaliation

Genenta Science will not tolerate any retaliation against Whistleblowers who raise concerns in good faith. Such retaliation is cause for disciplinary action up to and including termination of employment.

Any conduct, act or omission, even if only attempted or threatened, committed as a result of whistleblowing, complaining to the court or accounting authorities or making a public disclosure that causes or is likely to cause, directly or indirectly, unjustified harm to the whistleblower or complainant.

Any examples of retaliation?

- dismissal, suspension or equivalent;
- downgrading or non-promotion;
- change of duties, change of workplace, pay cut, change of working hours;
- suspension or restriction of access to training;
- negative merit notes or negative references;
- the imposition of disciplinary measures or other sanctions, including fines;
- coercion, intimidation, harassment or ostracism;

The protection also applies (the so called “**Protected Categories**”):

- to the facilitator (a natural person who assists the whistle-blower in the reporting process and operates within the same work context);
- to persons in the same employment context as the whistle-blower, the person who has made a complaint or the person who has made a public disclosure and who are related to them by a stable emotional or kinship relationship up to the fourth degree;
- to co-workers of the whistle-blower or the person who has made a complaint or the person who has made a public disclosure, who work in the same work environment and have a regular and ongoing relationship with that person;
- to companies owned by the whistle-blower or for which the same persons work, and to companies operating in the same working environment as those persons.

8. ADDITIONAL GENERAL WHISTLEBLOWING POLICY INFORMATION

7.1 Duty to inform

Genenta Science is responsible to provide information on the internal reporting process as well as on the reporting channel(s) to the competent authority. This information must be easily understandable and accessible.

8.2 Data Storage

All reports received are segregated and stored in the system so that they can be used as evidence, if necessary. All whistleblowing documentation will be kept only for the time necessary to process the

Effective Date: [June 5, 22025](#)

GEN-CORP-POL-008 v3.0

report and, in any case, no longer than five years from the date of the communication of the result of the reporting process.

8.3 Anonymous reports

The employee can choose to make an anonymous report or can decide to be identifiable. **However, even if anonymous reports are accepted, the Company believes that investigations can be handled more effectively if the Whistleblower's identity is known.**

In addition, if the Whistleblower decides to submit an anonymous report, they will not be entitled to be granted from protections provided for in the Whistleblowing Decree, unless they are subsequently identified by the Whistleblowing Committee.

When the employee makes a report using the web form, a PIN code is provided. This PIN will allow the employee to call the CMS process, access the web form and access to the report submitted to add further details or answer questions that may be put to the whistleblower by the person handling the report and to provide further information that may be helpful in resolving outstanding issues. It is strongly recommend to consult the site according to the timing notified to answer any questions. Even in case of anonymous report, it is possible to enter into an "anonymous dialogue" with the person in charge of investigating the case.

8.4 Unfounded report upon the outcome of the investigation

If the report is found to be unfounded or unjustified the case is closed. The Whistleblowing Committee shall inform the Whistleblower of the closure of the report and the relevant reasons.

8.5 Well-founded report upon the outcome of the investigation

If the report is well-founded, the corrective measures to be implemented will be identified as well as any applicable disciplinary sanctions, taking into account current legislation and internal regulations. The Whistleblowing Committee shall inform the Whistleblower of the closure of the report and the relevant reasons.

8.6 Security and Identification

The Syntrio platform does not generate or keep any authentication data related to the IP address. This means that it is not able to provide information that links your computer to its use. In any case, if you don't feel comfortable about making a report from your company computer, you can still connect to the Syntrio website using other computers or even you can call by the phone numbers provided.

The Syntrio procedure has been designed to protect anonymity. If you wish to remain anonymous, please take care not to give details in your report which could reveal your identity (e.g. avoid sentences such as: "from my desk next to Giuseppe Verdi's..." or "In my 48 years of life..." or using a login and email that can lead to your identity)

8.7 Confidentiality and data protection

Regardless of whatever whistleblowing channel you decide to use, any reports and subsequent communications, as well as all the data and information concerning the persons involved, will be considered strictly confidential and will be handled with utmost confidentiality, in compliance with the requirements of the Company's privacy notice (available at <https://www.genenta.com/privacy-policy/>) and of Privacy applicable law as well as the Whistleblowing Decree.

8.8 Information needed to give when making a report

Effective Date: [June 5, 2025](#)

GEN-CORP-POL-008 v3.0

Information needed are those necessary to start the evaluating and/or investigating the reported event. When making a report, avoid giving information about the private life of individuals, i.e. sensitive data, such as details on their health or sex life, if information of this kind is not strictly necessary or directly related to your report. You should also avoid giving information about people who are not involved in or related to the report.

In order to facilitate the handling of the report, it is helpful that it be as detailed as possible. When submitting a report, it is advisable to include at least the following information:

- a description of the incident with all relevant details (e.g., what happened, behavior, parties involved, date and place of the incident, etc.), and any additional information deemed relevant;
- where possible, indicate the Whistleblower became aware of the facts;
- personal details and/or other information that will enable the person involved in the report to be identified (e.g., job title, location, etc.);
- indication of the existence of any facilitators, i.e., witnesses, and their names and other information that allows them to be identified (e.g., job title, location, etc.).

If available, it is advisable to attach any documents supporting the report.

If gathering all the information takes too long, Whistleblower can submit the report based on the information available, which can be supplemented at a later stage. In any case, the Whistleblowing Committee will contact the Whistleblower if further information is needed

9. DISCIPLINARY SANCTIONS

The Company may impose disciplinary sanctions on those responsible in the following cases:

- (i) retaliatory and/or discriminatory conduct, whether direct or indirect, against Protected Categories;
- (ii) conduct that obstructs or attempts to obstruct reporting;
- (iii) violations of measures put in place to protect confidentiality;
- (iv) negligent management, verification, and analysis of reports received;
- (v) slanderous or defamatory reports.

10. REVIEW AND REVISIONS

This Policy will be reviewed periodically (at least every 3 years) and updated if necessary.

11. REASON FOR CHANGE

This Policy has been reviewed to comply with EU Directive 2019/1937 of the European Parliament and Italian Legislative Decree No. 24/2023.

12. PREVIOUS HISTORY OF POLICY

GEN-POL-008 v 2.0 as of December 12, 2023.

13. REFERENCES

"Privacy applicable Laws" shall mean (1)the EU General Data Protection Regulation 2016/679 of the European Parliament and of the Council ("GDPR"); , (2) Legislative Decree no. 196/2003, as subsequently amended ("Italian Data Protection Code");

Effective Date: June 5, 2025

GEN-CORP-POL-008 v3.0

- "Authorized Service Provider"** means the service provider appointed as Data Processor by Genenta Science: Lighthouse Service LLC. Genenta Science Personal Data are processed as required by Article 28(3) of the GDPR and, where applicable, equivalent requirements of other Privacy applicable Laws.
- Lighthouse Service LLC shall, in relation to Genenta Science Personal Data, implemented appropriate technical and organizational measures in accordance with standard industry practices to ensure a level of security appropriate to the risk, including, as appropriate, the measures referred to in Article 32(1) of the GDPR.
- "Genenta Science Personal Data"** means any Personal Data Processed by the Authorized Service Provider on behalf of Genenta Science pursuant to or in connection with the contract in place with Lighthouse Service LLC, according to article 28 GDPR;
- "Data Processor"** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- "Data Subject"** means an identified or identifiable natural person;
- "EEA"** means the European Economic Area as well as any country for which the European Commission has published an adequacy decision as published at http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm;
- "Personal Data"** means any information relating to a Data Subject;
- "Processing" or "Process"** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- "Transfer of Personal Data"** means the transfer of Genenta Science Personal Data that is located in the EEA to Lighthouse Service LLC that is not located in the EEA, which will take place in compliance with the Privacy Applicable Laws. Lighthouse Service LLC is prohibited from disclosing or using any information obtained in connection with its performance (including without limitation any "nonpublic personal information" as defined in Section 573.3 of Title 12 of the Code of Federal Regulations) for any purpose other than to carry out the purposes of providing hotline reporting services to Genenta Science. Lighthouse Service LLC complies with any and all applicable US Federal, State, and local laws and regulations concerning privacy of information in addition to the "Privacy applicable laws" set forth above;
- "Special Categories of Personal Data"** means Genenta Science Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data (when used for the purpose of uniquely identifying a natural person), biometric data (when used for the purpose of uniquely identifying a natural person), data concerning health, and/or data concerning a Data Subject's sex life or sexual orientation;
- "Supervisory Authority"** means an independent public authority which is established by a Member State pursuant to Article 51 of the GDPR.

Effective Date: [June 5, 2025](#)

GEN-CORP-POL-008 v3.0

Annex 1: Using the Lighthouse Anonymous Reporting App

Welcome to the Anonymous Reporting App from Lighthouse Services

This app can be downloaded to your phone and will enable you to submit new anonymous reports and follow up on anonymous reports related to an issue at your company or organization.

In order to use the app:

First, download it to your phone and install it.

- If your phone is an iPhone, download the app [here](#) or scan this code



- If your phone is not an iPhone, download the app [here](#) or scan this code



- If you are not currently reading this on your phone, use your phone to go to the Apple App Store (<https://www.apple.com/ios/app-store>) or the Google Play store (<https://play.google.com/store>) and search for “Anonymous Reporting”.

MAKING A NEW REPORT

When you open the app, it will present you with a field containing the words “Enter Keyword”. The keyword should be provided by your employer or other organization that subscribes to the Lighthouse service. Once you enter it, click “Save”. This will save that keyword in “Your Keywords”.

Click the keyword to submit your report. After submitting a report, you will be provided with a case number. You can store this case number in the app by copying the case number provided, clicking on the edit icon for the keyword and pasting it into the 'Enter Case Number' field. If you provided a PIN during report submission, check the 'This case number has a PIN' checkbox. There is no field to save your PIN; you will still need to remember it. Select 'Save' to store the case number.

FOLLOWING UP ON A PREVIOUS REPORT

To follow up on a specific report, select the case number below the keyword on the dashboard page.

If a PIN was required during report submission, the Case Management System portal page will be displayed with the case number pre-populated. You'll need to enter the report's PIN to access the report through the portal.

If a PIN was not required during report submission, your company's or organization's anonymous web reporting page will be displayed. On that page, click the submit button labeled "Don't have a PIN" under the 'Already Made a Report Selection'. This will take you to your organization's web reporting page. Scroll down and click “Don't have a PIN” under “Already Made a Report?”

Personal data related to the report will be processed in accordance with Regulation (EU) 679/2016 (“GDPR”), Whistleblowing Decree and the other applicable laws. For further information on the processing of your personal data, please see the privacy policy available here <https://www.genenta.com/privacy-policy/>.