

PRIVACY INFORMATION ON GOGGLIO WHISTLEBLOWING REPORTING CHANNEL

Information on the processing of personal data of individuals who report violations of Union and National Law (Legislative Decree no. 24 of 10 March 2023).

Document issued pursuant to art. 13 and 14 of EU Regulation 2016/679 and current legislation on the processing of personal data

1. Application scope

This information notice, drafted pursuant to Articles 13 and 14 of the EU Regulation 2016/679 (hereinafter the "Regulation") and the current legislation on the processing and free movement of personal data, applies in all cases of processing of personal data ("**the Data**") existing as a result of the activation by interested parties of the reporting channels provided for by Legislative Decree 10/3/2023 no. 24 and relating to cases of violation of national or European Union law provisions that harm the public interest or the integrity of the public administration or private entity, of which the reporters themselves have become aware in a public or private employment context.

2. Source and type of data collected

As a result of the activation of the reporting channel referred to in point no. 1, personal data are collected and processed by external, autonomous subject with specifically trained personnel pursuant to Article 4 paragraph 2 of Legislative Decree 10/3/2023 no. 24. Said external party is appointed as Data Processor pursuant to Art. 28 GDPR. Data collected, by way of example, refer to data identifying the reporting party or other parties, including data belonging to special categories of personal data (Art. 9 GDPR). Such Data (the "**Data**") will be collected and processed directly at the aforesaid third party in ways that ensures, including through the use of encryption tools, the confidentiality of the identity of the reporting person (whistleblower), of the person involved and of the person mentioned in the report, as well as the content of the report and the related documentation.

3. Legal basis and ways of data processing

The Company processes Data on the basis of the following legal bases:

- a) compliance with mandatory legal provisions;
- (b) the prior and informed consent of the whistleblower.

The processing of data takes place by means of the operations or set of operations indicated in art. 4, paragraph 1), no. 2) of the Regulation: collection, recording (including audio, if the reporting channel so provides), organization, structuring, storage, adaptation or modification, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication by transmission, dissemination or any other form of making available, limitation, cancellation and destruction of data.

These operations are carried out both with the aid of electronic or otherwise automated tools and manually and by means of paper archives. The Data are processed in compliance with the principles of correctness, lawfulness, transparency and protection of the confidentiality and rights of the data subjects, as well as in accordance with the provisions of Articles 9 and 10 of the Regulation, with the provisions in force on the subject and by adopting appropriate security measures pursuant to Article 32 of the Regulation.

Data processing is carried out by third parties expressly appointed as Data Processors by the Data Controller. If the processing is carried out by third parties who act as autonomous data controllers, they

undertake with the Company to comply with the provisions in force regarding personal data and to comply, as far as possible, with this information notice.

4. Data processing Purpose

The purpose of the processing of the Data is to manage the content of the report as defined in Article 5 of Legislative Decree 10/3/2023 No. 24, i.e:

- a) issue the reporting person (whistleblower) with an acknowledgement of receipt of the report within seven days from the date of receipt;
- b) maintain interlocutions with the reporting person and may ask the latter for additions, if necessary
- c) diligently follow up the reports received;
- d) provide acknowledgement of the report within three months of the date of the acknowledgement of receipt or, in the absence of such notice, within three months of the expiry of the seven-day period from the submission of the report
- e) make available clear information on the reporting channel and procedures related to it.

5. Provision of Data

The provision of Data of the whistleblower is compulsory for 'nominative registered reporting'. Refusal to provide data in the case of 'nominative registered reporting' means that the data controller is unable to follow up the report submitted by the person making the report. Providing the Data of the reporting party is optional in 'anonymous reporting'.

Any refusal to provide Data that are insufficient for the exercise of the purposes set out in point 3 will make it impossible for the Data Controller to exercise such purposes and fulfil its legal obligations.

6. Communication of Data

The communication of the collected personal data takes place mainly towards third parties and/or recipients whose activity is necessary for the fulfilment of the activities inherent to the management of the report (art. 5 dlgs 10/3/2023 n. 24), as well as to comply with certain legal obligations. In particular, the transmission may be made to:

- a) the Ethics Committee identified by the Data Controller;
- b) third party appointed to manage the reporting channel, as Processor pursuant to and for the purposes of Article 28 GDPR;
- c) external consultants (e.g. law firms) that may be involved in the preliminary stage of the report;
- d) company functions involved in the preliminary investigation activity;
- e) person(s) in charge of the function(s) concerned by the report;
- f) organisational positions in charge of investigating the report in cases where their knowledge is indispensable for understanding the facts reported and/or for conducting the relevant investigation and/or processing activities
- g) institutions and/or Public Authorities, Judicial Authorities, Police Bodies, Investigative Agencies;
- g) supervisory bodies.

Communication of data shall take place, as far as possible, in ways that ensure the confidentiality obligations set out in Legislative Decree 10/3/2023 no. 24.

7. Transfer of Data

The Data, if not necessary for the evaluation and preliminary investigation process, will not be transferred to countries located outside the European Union, and in any case this will always happen in compliance with the provisions of the Regulation.

8. Dissemination of Data

The Data will not be disseminated

9. Rights of the data subject

In accordance with the provisions of the Regulation, the rights granted to the data subject in relation to the Data are as follows:

- **access:** data subject has the right to obtain from the data controller confirmation that personal data concerning him or her is being processed, to obtain access to the same and to all the information referred to in art. 15, par. 1, lett. a)-h) and par. 2 of the Regulation and to request a copy of the same;
- **rectification:** where data subject considers that the Data are inaccurate or incomplete, the data subject may request that such data be rectified or modified following your instructions;
- **cancellation:** except in the cases provided for by the applicable legislation, the data subject has the right to request the cancellation of data, when: (i) the data are no longer necessary for the purposes for which they were collected and processed; (ii) revoke your consent to the processing; (iii) you object to the processing or processing carried out to pursue other purposes and there are no overriding legitimate reasons to continue with the processing; (iv) the Data are processed unlawfully; (v) erasure is required by law;
- **limitation:** The data subject may request the limitation of the processing of Data in the cases referred to in art. 18 of the Regulation;
- **opposition:** the data subject has the right to object to the processing of Data in the cases referred to in art. 21 of the Regulation;
- **Withdrawal of consent:** in the event that the processing of personal data is based on consent, the data subject has the right to revoke it at any time. This revocation will prevent the continuation of the processing carried out on the legal basis of consent, without prejudice to the lawfulness of those carried out up to that moment;
- **data portability:** where the processing is based on consent, the data subject has the right to receive the Personal Data provided in a structured, commonly used and machine-readable format and, where this is technically feasible, to the secure transmission of the Data to another data controller.

To protect rights and data protection, the data subject may, at any time, decide to file a complaint with the competent supervisory authority, namely the Privacy Guarantor ('Garante Privacy'), or to bring an action before the competent national courts.

10. Data retention

The personal data collected are stored for a period not exceeding ten years, starting from the date of receipt or the Report, as well as for the entire period necessary to carry out any procedures arising from the management of the report (disciplinary, criminal, accounting).

11. Data controller

The data controller is Goglio Spa, with registered office in via Solari n.10, Milan (MI), VAT IT00870210150, e-mail address: privacy@goglio.it

Best regards.

Goglio Spa