

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Pursuant to Article 13 of the EU Regulation 679/2016 (hereinafter the "**GDPR**"), Axxam SpA (hereinafter the "**Company**") provides the following information regarding the processing of personal data (hereinafter the "**Data**") carried out in relation to the reporting service in accordance with Legislative Decree 24/2023.

DATA CONTROLLER

The Data Controller is Axxam SpA., with registered office in Bresso in via Meucci 3, who can be contacted by post at the above address or by email at the following addresses: privacy@axxam.com

DATA PROCESSED, LEGAL BASIS, NATURE AND PURPOSE OF PROCESSING

The data processed in the report management are:

- Contact data, identification or contact details provided by the reporter;
- Information (identification data, professional data, financial data) on the reported person contained in the report or acquired during the investigation;
- Information (identification data, professional data, financial data) on third parties that may be included in the report and in any documents attached or acquired during the investigation.

The Data provided will be processed for the following purposes:

1. Handling of reports (ascertaining the facts that are the subject of the report). The legal basis for processing is the regulatory obligation under Legislative Decree 24 of 10 March 2023;
2. Management of any disciplinary proceedings based in whole or in part on the report. In order to guarantee the reported person's right of defence, the information contained in the report may be used, together with any other external evidence, in the disciplinary proceedings initiated against the reported person. The whistleblower's identity must not be disclosed, where the allegation of the disciplinary charge is based on investigations that are separate from and additional to the report, even though consequent to it. If the charge is based, in whole or in part, on the report and knowing the identity of the person making the report is indispensable for the accused's defence, the report shall be usable for the purposes of disciplinary proceedings only if the person reporting the matter has expressly consented to the disclosure of his/her identity. Therefore, in this case, failure to provide consent will make it impossible to proceed against the reported person.

The personal data identifying the reporting person shall be processed and stored in such a way as to be visible only to the body in charge of handling the report. The company adopts all the guarantees provided for by law in order to protect the confidentiality of the reporter's identity, so that the same is not disclosed to third parties without the reporter's express consent, except in the case of bad faith or defamatory reports.

RECIPIENTS OF THE DATA

The Data may be shared with:

- 1) the company's Supervisory Body, if any, only for the reporter's data;
- 2) internal employees of the Data Controller or subjects, bodies or authorities to whom the Data must be communicated by virtue of provisions of law or orders of the authorities for the data subject of the report
- 3) parties that typically act as data processors pursuant to Article 28 GDPR, i.e. parties that cooperate with the Company for the pursuit of the above purposes.

TRANSFER OF DATA ABROAD

Your data will be processed in Italy, in accordance with current legislation on the processing of personal data.

Should you request processing to be carried out outside the national territory, the Data may be transferred outside the Italian territory; in this case you will be provided with specific information.

DATA STORAGE

Personal data relating to reports and their documentation shall be kept for the period necessary to complete the verification of the facts set out in the report and for 5 years after the report is closed, except for any proceedings arising from the management of the report (disciplinary, criminal, accounting) against the reported person or the reporting person (bad faith, false or defamatory statements). In this case, they will be kept for the duration of the proceedings and until the expiry of the time limit for appealing against the relevant measure. Personal data that are clearly not useful for processing a specific report shall not be collected or, if accidentally collected, shall be deleted immediately.

RIGHTS OF THE DATA SUBJECTS

Interested parties may at any time request to know origin, purpose and modalities on which the processing is based, to obtain access to the same, to update, rectify, supplement, cancel, transform into an anonymous form, limit the processing, to have the data processed in violation of the law blocked and to obtain a copy of the data in a structured, commonly used and machine-readable format, or to transmit such data to another data controller without hindrance. Data subjects may also lodge a complaint with the Control Authority, represented in Italy by the Personal Data Protection Authority.. Information on this can be found on the website of the Personal Data Protection Authority at www.garanteprivacy.it.

To exercise their rights, the interested parties may write to Axxam SpA with registered office in Bresso in via Meucci 3, email privacy@axxam.com.