

PERSONAL DATA PROCESSING NOTICE
under articles 13 and 14 of Regulation (EU) 2016/679
concerning reporting of unlawful acts (referred to as “Whistleblowing”)
for whistleblowers, facilitators, and persons involved and mentioned in the report

Under Regulation (EU) 2016/679 (hereinafter referred to as the "Regulation" or "GDPR"), the following information is provided on the processing of data in connection with reporting of unlawful behaviour which a person may become aware of in the course of their work, under Legislative Decree no. 24/2023, by employees, partners, customers, suppliers, consultants, associates and, in general, anyone who has relations with the undersigned Data Controller or is involved in the reporting of a breach or mentioned therein.

DATA CONTROLLER. The data controller for the personal data which is the subject of this notice is COECLERICI S.p.A., with registered offices in Piazza Armando Diaz, 7, (20123) Milan

PURPOSES AND LEGAL BASIS OF THE PROCESSING. Processing of the data is aimed at receiving and managing written and oral reports of unlawful acts, including ascertainment of the events reported therein, and adoption of the consequent measures, as well as discussion with the whistleblower to obtain additional information and inform the whistleblower of the outcome of the report.

Data processing is lawful under art. 6 letter c of the GDPR (fulfilment of a legal obligation, including Legislative Decree 24/2023); under art. 6 letter f of the GDPR (legitimate interest of the data controller and of other parties in the reporting of unlawful or incorrect conduct and the prevention of risks and harmful situations); under art. 9 par 2 letter b of the GDPR (obligations and rights concerning labour law); under art. 9 letter f of the GDPR (ascertainment, exercise or defence of a right in a court of law); and under art. 9 letter g of the GDPR (significant reasons of public interest).

The whistleblower's consent to the revelation of his or her identity may be requested, under art. 6 paragraph 1 letter a of the GDPR, or if it is, with motivation, considered indispensable for the defence of the person involved who is accused of the unlawful conduct reported.

ORIGIN AND TYPE OF DATA. The data processed will be data supplied with the report or contained in it, or in any documents that may be submitted with it, as well as any other data that may be acquired in the course of the handling of the report. The data may include both ordinary data (identifying data, contact data, information on professional qualifications held, type of relationship with the company or with third parties) and, possibly, data falling within special categories (meaning data that may reveal, among other information, racial and ethnic origin, data on medical conditions and sexual life) and data and information connected with the unlawful conduct reported, concerning the whistleblower (except in the case of an anonymous report) and the persons involved and/or mentioned in the report.

Personal data which is clearly not of use for the handling of a specific report will not be collected, and will be erased immediately if collected accidentally.

Providing of personal data is optional. Refusal to provide personal data may, however, have an impact on the handling of the report.

PROCESSING METHODS AND CONFIDENTIALITY The data will be collected and processed in compliance with current legislation, using electronic, telematic and manual methods, in print and/or electronic form and/or in oral form, adopting appropriate measures to ensure the security, integrity and confidentiality of the data in order to reduce the risk of destruction or loss, unauthorised access, and unauthorised modification and disclosure, and to guarantee protection of the identity of the persons involved, as well as the anonymity of the whistleblower, where applicable.

Management of the report and preliminary verification of the soundness of the circumstances reported are entrusted to a specific office which, in compliance with the principles of impartiality and confidentiality, performs this task with personnel specifically trained to perform this type of work and expressly authorised to process the data (under art. 29 of the GDPR and art. 2-quadeterdecies of Legislative Decree no. 196/2003, referred to as the Privacy Code). Until the conclusion of the proceedings undertaken in response to the report, the identity of the person making the report and any other information that could directly or indirectly reveal this person's identity will be protected and will not be disclosed to unauthorised third parties without the whistleblower's express consent. The identity of persons involved and mentioned in the report shall also be protected in the same way (e.g. colleagues, witnesses) until the conclusion of the proceedings initiated as a result of the report.

In the context of the disciplinary proceedings, if the disciplinary contestation is founded, in whole or in part, on the report and knowledge of the whistleblower's identity is essential for the defence of the accused, the report may be used for the purposes of disciplinary proceedings only with the whistleblower's consent to the revelation of his or her identity, and having notified him or her of the reasons for this revelation.

DATA RECIPIENTS. Personal data may be disclosed to: employees and associates of the undersigned office, who will process the data in compliance with the authorisation and instructions given to them; external bodies, consultants or parties - bound under their contracts or legal obligations to maintain and protect the confidentiality of the personal data, which they will, depending on the circumstances, process as independent data controllers or as duly appointed persons in charge of the processing - performing activities for the undersigned organisation connected with the reception and management of reports; and to persons/bodies to which the personal data must be disclosed due to legal obligations or whose option of accessing the data is recognised by the provisions of the law (including: National Anticorruption Authority - ANAC, governmental investigative authorities, judicial authorities).

The data collected will not be disclosed or subjected to any fully automated decision-making processes, including profiling, and will not be transferred outside the EU.

DATA STORAGE. Personal data will be stored for 5 years starting on the date of collection, and in all

cases for the entire duration of any disciplinary or judicial proceedings that may arise in connection with the report.

DATA SUBJECTS' RIGHTS. The data subject may contact the Data Controller with no need for any particular formalities in order to exercise his or her rights under articles 15 through 22 of the Regulation (right to: accessing of personal data, rectification, erasure, limitation, data portability, and the right to object to processing and to be informed of any automated decision-making processes), while retaining the right to file a complaint with the supervisory authority.

The exercise of the data subject's rights under articles 12 through 22 of the GDPR may be limited, delayed or excluded where it may effectively and concretely prejudice the confidentiality of the identity of the whistleblower or other persons involved, the proceeding of defence investigations or the exercise of a right in court, and in all cases these rights may be exercised within the limits identified in art. 2 undecies of Legislative Decree 196/2003 (referred to as the Privacy Code).

The data subject's rights may be exercised by contacting the Data Processor: MyGo S.r.l. of Via del Corso, 92 (00186), Rome; email dpo@zucchetti.it

