

INFORMATION ON THE PROCESSING OF PERSONAL DATA

WHISTLEBLOWING REPORTS

Pursuant to Article 13 of the European Regulation no. 679/2016 "General Data Protection Regulation" ("**GDPR**"), we inform you that your Personal Data, as better identified below, will be processed by Gianvito Rossi S.r.l.

All personal data shall be processed in accordance with the applicable data protection legislation, meaning the GDPR, Legislative Decree No. 196/2003 as subsequently amended ("**Privacy Code**") as well as any other data protection legislation applicable in Italy, including the provisions of the Garante (hereinafter, together with the GDPR, the "**Privacy Regulation**"), in full respect of fundamental rights and freedoms, with particular regard to the confidentiality of the identity of the subjects involved and the security of processing.

The following information is provided for the purposes of transparency vis-à-vis the **whistleblower**, in order to inform him/her of the terms and modalities of data processing, including the exercise of related rights and their limits in the light of the provisions of Legislative Decree 24/2023 ("**Whistleblowing Decree**").

DATA CONTROLLER

The Personal Data Controller (or also just the "**Data Controller**" or the "**Company**") is Gianvito Rossi S.r.l. (also just "**GVR**"), with registered office in San Mauro Pascoli (FC), Via dell'Indipendenza 15. The Data Controller can be contacted by mail at the registered office, as well as at the following e-mail address: privacy@gianvitorossi.com

DATA PROTECTION OFFICER

The Data Protection Officer ("**DPO**"), for all matters concerning the processing of Personal Data and the exercise of the data subject's rights, can be contacted at the following e-mail address: dpo@gianvitorossi.com.

CATEGORY OF PERSONAL DATA

The Personal Data of the person making the report (the "**Whistleblower**"), and those of any other persons involved and/or connected to the facts that are the subject of the report (or also the "**Reported Person**" or the "**Third Party**"), acquired in connection with the handling of reports ("**Report**") include (i) identification data of the Whistleblower (personal details, contact details); (ii) identification data of the Reported Person and/or the Third Party provided by the Whistleblower and/or further acquired in the course of the ensuing investigation and assessment activities (iii) other data that will be entered by the Whistleblower when filling in the reporting form/supplied orally or subsequently acquired by the Persons in charge of the Processing of Reports in the course of the preliminary investigation activities, including any reference to data on the Reported Person and/or on Third Parties and reported by the Whistleblower himself/herself or acquired in the course of the subsequent preliminary investigation activities.

With reference to point (iii) above, the Company cannot exclude that the content of the Report includes not only data of a common nature, but also data of a particular nature pursuant to Article 9 GDPR and judicial data pursuant to Article 10 GDPR. In this hypothesis, the Data Controller will process the data, for the purposes set out in this Notice and for the sole purpose of managing and following up the Reports, in accordance with the provisions of art. 6, par. 1 lett. c) and p. 2 and 3, art. 9 par. 2 lett. b), f) and g) and art. 10 and 88 GDPR.

PURPOSE OF PROCESSING

The Personal Data of the Whistleblower, the Reported Person and/or the Third Party, shall be collected and processed, within the Whistleblowing procedure, exclusively for the purposes of investigating and ascertaining the facts that are the subject of the Report and of adopting any consequent measures in compliance with the provisions of Legislative Decree no. 24/2023. In particular, the Personal Data collected will be only those necessary and pertinent for the achievement of the purposes indicated above, on the basis of the principle of minimization.

Personal Data that will not be useful for processing a specific Report will not be collected or, if accidentally collected, will be deleted immediately.

LEGAL BASIS FOR PROCESSING

The legal basis for the processing of the Personal Data of the Whistleblower, the Reported Person and/or the Third Party, provided on the occasion of reports concerning alleged irregularities, offences and/or omissive conduct detrimental to the public interest or the integrity of the Company and which has come to the knowledge of the latter by reason of or in connection with the employment relationship, is to be found in the fulfilment of the legal obligation pursuant to Art. 6(1)(c) provided for in Legislative Decree 24/2023 concerning the "*protection of persons who report breaches of Union law and laying down provisions on the protection of persons who report breaches of national laws*" and, as regards special data, the data will be processed on the basis of Article 9(2)(b), (f) and (g) of the GDPR.

Such data may also be processed to comply with requests by the competent administrative or judicial authorities and, more generally, by requesting public bodies, in compliance with the formalities laid down by law.

The Data Controller may also process Personal Data for:

- (i) internal control and business risk monitoring needs, as well as for the optimization and streamlining of internal business and administrative processes that might imply a longer retention of the Report than the mere management and resolution of the Report in question;
- (ii) ascertain, exercise or defend a right or legitimate interest of the Controller in any competent forum.

The legal basis of the processing operations referred to in points (i) and (ii) above is to be found, respectively, in the legitimate interest of the Data Controller in ensuring the efficiency of the company's organization, also with a view to preventing and effectively combating fraudulent and unlawful or irregular conduct, and in the exercise by the same of the right to defend its own reasons in the appropriate fora.

The provision of data is not compulsory, since anonymous reports are possible, but a refusal to provide such data could make it more difficult to ascertain whether the Report is well-founded, if it is not substantiated, based on precise and concordant elements, does not concern verifiable facts and/or does not contain all the elements necessary to carry out the aforementioned ascertainment.

MODE OF TREATMENT

The data provided within the framework of the Reports are processed by the Company's 'Persons in Charge of the Processing' (or also just '**Persons in Charge**') in compliance with the methods established by the Data Controller and in compliance with the Privacy Regulation, with a guarantee of the principles of lawfulness, correctness, transparency and relevance, as well as in compliance with the provisions of Legislative Decree 24/2023.

In any case:

- the identity and Personal Data of the Whistleblower, of the Reported Person and/or of Third Parties that may be involved in the Report, will be processed in compliance with the principle of confidentiality, including through the use of encrypted systems and of all appropriate technical and organizational measures to ensure the security of the processing;
- in line with Legislative Decree 24/2023, the identity of the Whistleblower may not be disclosed without his consent, which the Persons in Charge shall request in the cases specifically provided for in the Whistleblowing Decree.

The Company also ensures the confidentiality of information relating to (i) the identity of the Reported Person (the so-called involved person); (ii) the facilitator (both with reference to the identity and to the activity in which the assistance takes place); (iii) persons other than the Reported Person, but nevertheless implicated as mentioned in the Report (e.g. witnesses, Third Parties), until the conclusion of the proceedings initiated on account of the report and in compliance with the same guarantees provided for in favor of the Whistleblower.

In any case, all necessary measures to protect Personal Data against accidental or unlawful destruction, loss, and unauthorized disclosure shall be taken in the course of the activities aimed at verifying the validity of the Report.

RECIPIENTS/CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The recipients of the Personal Data of the Whistleblower, the Reported Person and/or Third Parties are the Persons in Charge, who, in accordance with the provisions of the Privacy Policy and Legislative Decree 24/2023 are required to ensure the confidentiality of the Whistleblower's identity.

Moreover, in cases where it is necessary for the purposes of ascertaining the merits of the fact which is the subject of the Report, of the related investigative activities and of the adoption of the consequent measures, as well as for the initiation of any disciplinary measures, the recipients of the Personal Data of the persons concerned may be other functions of the Company and any consultants. If necessary, the data of the persons concerned may also be communicated to the judicial authorities and to investigative bodies for the purpose of activating the procedures necessary

to guarantee, because of the Report, suitable protection, as well as for any investigations that may be necessary.

DATA TRANSFER TO NON-EU COUNTRIES

Personal Data processed for the above-mentioned purposes are not transferred to third countries outside the European Union or the European Economic Area (EEA) or to international organizations.

If necessary, the Data Controller shall be entitled to move the location of the archives and servers to Italy and/or the European Union and/or countries outside the EU. In the latter case, it is assured, as of now, that the transfer of data outside the EU will take place in compliance with the applicable legal provisions, stipulating, where necessary, agreements that guarantee an adequate level of protection and/or adopting the standard contractual clauses provided for by the European Commission.

RETENTION PERIOD OF COLLECTED DATA

Personal Data collected for the above-mentioned purposes will be kept for as long as necessary for the performance of the activities of assessing the merits and of the management of the Reports and, in any case, no longer than five years from the date of communication of the outcome of the Report procedure.

RIGHTS OF THE DATA SUBJECT

Pursuant to Articles 15 et seq. of the GDPR, the persons concerned are granted certain rights, which may be exercised within the limits of their compatibility with the legislation on *Whistleblowing* (where the exercise of such rights may result in actual and concrete prejudice to the confidentiality of the identity of the Whistleblower) and the provisions of Article 2-undecies of Legislative Decree no. 193/2003, namely:

- Right of access: the right to obtain, without undue delay, information concerning (i) the purposes of the processing; (ii) the categories of Personal Data processed; (iii) the recipients or categories thereof to whom the data may be disclosed, in particular if located in non-EU countries, and the means for exercising your rights vis-à-vis those entities; (iv) when possible the storage period or the criteria for determining it; (v) the updating, rectification or, where interested therein, the integration of Personal Data as well as the origin of data collected from third parties.
- Right of rectification: the right to obtain without undue delay the rectification of inaccurate Personal Data and, considering the purposes of the processing, to obtain the integration of incomplete Personal Data, including by providing a supplementary declaration;
- Right to erasure: *the* right to obtain, without undue delay, the erasure of Personal Data where one of the grounds listed in Article 17(1) GDPR applies - such as where the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed - unless the processing is necessary on the basis of the provisions of paragraph 3 of that Article. 1 of the GDPR - such as where the Personal Data are no longer necessary in relation to the purposes for which they were collected

or otherwise processed - unless the processing is necessary according to the provisions of paragraph 3 of the same Article, including (a) compliance with a legal obligation requiring the processing as provided for by Union or Member State law to which the Controller is subject, or (b) the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller, or (c) the establishment, exercise or defense of legal claims;

- Right to restriction: the right to obtain the restriction of processing where one of the cases referred to in Article 18(1) of the GDPR applies: if processing is restricted, Personal Data will be processed - except for storage - only with the consent of the data subject or for the establishment, exercise or defense of legal claims or to protect the rights of another natural or legal person or for reasons of substantial public interest of the Union or a Member State

It is emphasised that the exercise of the above-mentioned rights by the data subject may be done by sending the relevant requests to the e-mail address privacy@gianvitorossi.com.

If the data subject considers that processing operations concerning him/her violate the Privacy Policy, he/she shall have the right to lodge a complaint with the competent data protection authority.