

DATA PROCESSING NOTICE

The company **AIGNEP SPA**, with its registered office in (25070) Bione (BS), Via Don G. Bazzoli, no. 34, enrolled in the Brescia Register of Companies R.E.A. no. BS - 210976, Tax Code 00808880173 and VAT no. 00579210980, in the person of its pro tempore legal representative, Graziano Bugatti, (hereinafter, Aignep or the Company), in its capacity as data controller (hereinafter, the Data Controller), hereby informs the parties concerned that the data will be processed by the Company in accordance with the provisions of the law. VAT 00579210980, in the person of its legal representative pro tempore, Graziano Bugatti, (hereinafter, Aignep or the Company), in its capacity as data controller (hereinafter, the Data Controller), informs, pursuant to Article 13 EU Regulation no. 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter, GDPR), that your personal data, in your capacity as the reporting party (hereinafter, the Reporting Party), and the information contained in the reports and any documents attached thereto, will be processed in accordance with the principles of fairness, lawfulness, transparency, minimisation of processing and protection of confidentiality and your rights, in compliance with the obligations imposed by the legislation on the protection of personal data and Legislative Decree no. 24/2023.

1. Purpose of processing and nature of data

The personal data to be processed may be the identification and contact data of the reporter and the information, including personal data of third parties, contained in the reports and any documents attached to them.

Personal data will be collected directly from the person concerned or from third parties, either in written form (via the IT platform) or orally (e.g. in the event of a meeting requested by the reporting person with the persons in charge of handling the report).

Reports must only contain information necessary to substantiate what is reported. Should the reports contain personal information that is not necessary for the pursuit of the aforementioned purposes, the Company shall destroy it or, if this is not possible, obscure it, except in cases authorised by law or by a provision of the Supervisory Authority for the protection of personal data.

The provision of data for these purposes is optional. You may therefore decide not to provide any data, in which case the data controller may not be able to follow up the report. Since suspected violations can also be reported anonymously, you are not necessarily required to provide your personal data when submitting the report. In the event that you freely decide to provide your personal data, you consent to the processing of your personal data for the purposes described in this Policy via the whistleblowing platform. However, even in relation to anonymous reports, it cannot be ruled out that, in the course of examining such reports, the Data Controller - if necessary through its data processors - may come into possession of personal information regarding other categories of data subjects (e.g. persons other than the Whistleblower, third parties, etc.), which will therefore be processed in accordance with this Policy.

As part of the reporting acquisition and management process, therefore, the Data Controller shall process any personal data supplied by the reporting party, and the data of other categories of data subjects, such as persons involved in and/or connected to the reporting process, adopting all the guarantees provided for by law in order to protect the confidentiality of the reporting party's identity, so that it is not disclosed to third parties without the latter's express consent, except in the case of reports made in bad faith or defamatory.

2. Legal basis of the processing

The legal basis for the processing of personal data by the Controller for the above-mentioned purposes is therefore

- a) the need to fulfil legal obligations. This need represents the legal basis legitimising the resulting processing, since the Data Controller is required, in the acquisition and management of reports, to comply with legal obligations, in particular those laid down in Legislative Decree 24/2023;
- b) the free and informed consent of the reporting person, where he/she has agreed to reveal his/her identity, to the processing necessary for the management of the report. Where it is necessary to disclose the identity of the reporting person to persons other than those responsible for receiving and handling the report, in accordance with the provisions of Legislative Decree 24/2023, the reporting person will be asked for express and specific consent. Consent is optional and may be freely revoked at any time according to the procedures that will be indicated in the request, it being understood that revocation of consent will not affect the lawfulness of the processing carried out prior to it.

3. Modalità del trattamento dei dati

Personal data are processed when the report is acquired through the use of a special IT platform. In the subsequent phases of the management of the report, the processing will be carried out with the support of the same platform and/or through the support of other paper, computer or telematic means, also by means of managers appointed in compliance with the applicable rules.

The protection of the processed personal data is implemented by means of the necessary security measures, both technical and organisational, suitable to guarantee the security, availability, integrity, confidentiality and authenticity of the data. Data collected via the IT platform are processed using a specific cryptographic protocol.

4. Data retention periods

The personal data provided will be kept for no longer than 5 (five) years from the date of communication of the final outcome of the reporting procedure. This is without prejudice to the possibility of defending the Controller's rights in all fora, in particular in the event of any legal proceedings.

5. Categories of recipients of personal data

Personal data will be processed for the purposes specified above, exclusively

- a) by the persons appointed by the Controller to manage it and authorised by the Controller to process it and/or identified as having specific functions and tasks;
- b) the platform provider and/or the provider of the alert management services, who will act as data controller within the meaning of Article 28 GDPR;
- c) the platform provider and/or the provider of the alert management services, who will act as data controller within the meaning of Article 28 GDPR;
- d) judicial authorities and any other person identified by the legislation in force in the area of reporting offences.

The contact details of these persons may be disclosed upon justified request to be sent to the contact details above.

6. Data Transfer

Data are stored on servers and storage facilities located within the European Union. Personal data will not be transferred to countries outside the European Economic Area. Should it become necessary, the Data Controller has the right to transfer the data also to countries outside the European Union or the European Economic Area recognised by the European Commission and which guarantee an adequate level of protection of personal data or, otherwise, only if an adequate level of protection of personal data with respect to that of the European Union is contractually guaranteed and the exercise of the rights of the data subjects is ensured. In this case, the Controller hereby ensures that the transfer of Data outside the EU will be carried out in compliance with the applicable legal provisions, applying to such transfers all the necessary safeguards. The Data Controller will apply to such transfers all the protections necessary under applicable privacy laws.

7. Rights of the data subject

The data subject may, subject to any existing legal obligations, exercise the rights recognised in Articles 15-22 GDPR:

- a) right of access to personal data;
- b) the right to have them rectified or deleted by accessing the reporting platform;
- c) right to withdraw consent, where provided for: withdrawal of consent does not affect the lawfulness of the processing based on the consent given prior to withdrawal; withdrawal of consent makes it impossible to access your profile, you will still be able to view the alerts by means of their codes; withdrawal is not provided for, however, where processing is necessary to comply with a legal obligation to which the data controller is subject;
- d) the right to lodge a complaint with the Garante per la protezione dei dati personali pursuant to Art. 77 d GDPR or appeal to the competent Judicial Authority pursuant to Art. 79 GDPR, in the manner and within the limits provided for by current legislation.
- e) Si informano gli interessati che i diritti non potranno essere esercitati quando dall'esercizio possa derivare un pregiudizio effettivo e concreto alla riservatezza dell'identità del Segnalante.

In this case, the exercise of rights will be carried out in accordance with the applicable legal provisions, including by means of a request to the Supervisory Authority for special investigations.

Pertanto, per evidenti ragioni di tutela della riservatezza del Segnalante, si invitano i soggetti segnalanti, ad esercitare i propri diritti, in particolare quelli afferenti alla rettifica o cancellazione dei propri dati personali, revoca del consenso, ecc., utilizzando la stessa piattaforma indicata nella procedura whistleblowing per l'effettuazione della segnalazione ed inviando, tramite la piattaforma, una richiesta in tal senso.

As regards the rights of any person other than the Reporting Party, the Data Controller informs that the exercise of such rights, and in particular the right of access, may be delayed, limited or excluded for as long as this constitutes a necessary and proportionate measure, taking into account the Reporting Party's fundamental rights and the compliance with legal obligations by the Data Controller or the Persons in charge, also in order to safeguard the Reporting Party's privacy and identity protection interests and to ensure that the investigation of the matter reported does not risk being compromised.

8. Methods of exercising rights

The interested party may exercise its rights at any time by sending a registered letter with return receipt to AIGNEP SPA, with registered office in (25070) Bione (BS), Via Don G. Bazzoli, no. 34 or a PEC to aignep@legalmail.it.

9. Owner, manager and appointees

The Data Controller is AIGNEP SPA. The updated list of data processors and persons in charge of processing is kept at the Data Controller's head office.

10. Amendments to this Policy

This Information Notice is subject to change. It is up to the person concerned to check regularly for any updates.