

POLICY PURSUANT TO ART. 13 AND 14 OF REGULATION (EU) 2016/679 ("GDPR") ON THE PROCESSING OF PERSONAL DATA OF PERSONS INVOLVED IN THE MANAGEMENT OF REPORTS OF WRONGDOING .

Lesepidado S.r.l. with legal and administrative headquarters in Castel San Pietro Terme District Osteria Grande -Bologna - amministrazione@lesepidado.it (hereinafter referred to as "**Lesepidado**" or the "**Holder**") provides, below, the information on the processing of personal data of whistle-blowers, reported and any other third parties involved (hereinafter all "**Interested Parties**" to processing) carried out by the same in relation to the management of reports of offences governed by the "Whistleblowing Policy" (hereinafter, "**Policy**").

1. Categories of data subject to processing.

We will process the Personal Data of the reporting person, the reported person and any third persons that may be reported in the report made by the reporting person, with regard to the only data necessary to carry out the necessary investigative activities aimed at verifying the validity of the reported fact and the adoption of the consequent measures as indicated in the Policy.

Data revealing racial or ethnic origin, political opinions, religious and/or philosophical beliefs, union membership, and genetic data may also be processed if provided, biometric data, data relating to the health or sexual life or sexual orientation of the person and data relating to criminal offences and convictions.

2. Purpose and legal basis of processing

Personal data of data subjects are processed for the following purposes:

- 1) Ensure the correct and complete management of reports of illegal conduct pursuant to Law Decree 24/2023
- 2) Carry out the necessary investigative activities to verify the validity of the reported fact and the adoption of the subsequent proceedings
- 3) Legal protection of a right of the Holder
- 4) Responding to a request from the Judicial Authority or Authority treated as such

The legal basis is the fulfilment of a legal obligation.

As per regulations, the confidentiality of the identity of the reporting agent is guaranteed, managing personal data separately from the content of the report made.

Any matching can only be performed in exceptional cases according to the applicable legal requirements (e.g., to exercise the right of defence of the accused person, subject to the consent of the signalman; in cases where the criminal liability of the signalman for the offences of slander or defamation is established, including by a judgment of the first instance; in cases of reports that prove to be unfounded, made with intent or gross negligence).

In exceptional cases, where the alert has given rise to disciplinary proceedings and is based solely on the complainant's complaint, the complainant's identity may be disclosed to the person who is subject to disciplinary proceedings, whether this is absolutely essential to exercise his right of defence. In such cases, the alert will only be usable for the purposes of disciplinary proceedings if the reporting agent has agreed to disclose his identity.

The particular categories of personal data and judicial data will be processed for this purpose, respectively, pursuant to art. 9, co. 2, letter b) and Art. 10 of the GDPR.

With regard to any processing of personal data following the closure of the procedure for the analysis of the report, the legal basis is represented by the legitimate interest of the Holder to exercise their rights in all cases where it is necessary (e.g., reopening of court proceedings, claims for damages related to reporting), pursuant to art. 6, co. 1, letter f) and art. 9, co. 2, letter f) of the GDPR.

3. Source of personal data

The Holder collects data through reports made through the Whistleblowing channel on the company's website. The data of Interested Parties, contained in the report, are provided directly by the reporting agent. Reporting may be employees and/or collaborators, directors, consultants and, in general, all stakeholders of the Holder, of Group companies or any subject with a legitimate interest.

To preserve the investigative purposes, in the cases provided for by law, the reported, pursuant to art. 14, co. 5, letter d) of the GDPR, may not be immediately made aware of the processing of your data by the Holder,

as long as there is a risk of jeopardising the possibility of effectively verifying the validity of the complaint or of collecting the necessary evidence.

4. Methods of data processing

LeSepidado collects the personal data of the interested party in archives, both computer and telematic, and processes them with the methods strictly necessary for the purposes indicated and, in any case, with the use of appropriate technical and organizational measures to ensure the security of the processing and therefore the confidentiality of the data.

The data will be processed in compliance with the principle of lawfulness, correctness, relevance and not excess, according to the provisions of the legislation on the protection of personal data.

The processing will be carried out by the internal staff formally authorized by the Holder, bound to the obligation of confidentiality and adequately trained in the matter.

5. Period of retention of data

The data are kept for the time necessary for the processing of the report as well as for the period necessary to carry out any procedures arising from the management of the report (disciplinary, criminal, accounting) and no later than five years from the date of notification of the final outcome of the reporting procedure.

It is without prejudice to the retention for a longer period in relation to requests from the public authority or the Data Protection Authority and for a longer period but within the limitation period, in relation to requirements relating to the exercise of the right of defence in the event of disputes.

6. Nature of the transfer and consequences of any refusal

The provision of data of the reporting person is mandatory. Any refusal to provide data makes it impossible to follow the procedure pursuant to Legislative Decree no. 24/2023.

However, anonymous reporting is possible. However, the application of the reporting procedure will only be possible if the alerts are properly substantiated and given in detail, that is, if they are able to bring out facts and situations relating to specific contexts.

7. Data recipients

The communication of the collected personal data takes place mainly towards third parties and/or recipients whose activity is necessary for the accomplishment of the activities related to the management of the report, as well as to respond to certain legal obligations.

In particular, the transmission may take place against:

- a) Responsible for the function concerned by the alert
- b) Company entrusted with the management of the Web platform, in its capacity as External Manager pursuant to art. 28 of Reg. EU 679/2016.
- c) Institutions and/or Public Authorities, Judicial Authorities, Police Bodies, external legal mandates, Companies of private investigations, which will act as independent Holders.

Personal data will not in any way be disseminated or disclosed to other parties than those identified above.

Also will not be transferred abroad to third countries.

8. Rights of the interested parties

The Interested Parties may ask the Holder, by means of an e-mail request to the address amministrazione@lesepidado.it, access to the data concerning them, their correction, integration or cancellation, as well as the limitation of the processing or opposition (rights referred to in Articles 15 to 22 of the GDPR) by using the prerequisites. Interested Parties also have the right to lodge a complaint with the Data Protection Authority for the protection of personal data in case of unlawful or unlawful processing of their data by the Holder.