

**INFORMATION ON THE PROCESSING OF PERSONAL DATA  
AS PART OF THE WHISTLEBLOWING PLATFORM  
Pursuant to art. 13 and 14 of Regulation (EU) 2016/679 ("GDPR")**

Dear User,

the company Tecno S.p.A., with registered office in Milan Piazza XXV aprile 11, in its capacity as data controller ("**Company**" or the "**Data Controller**"), is **required to provide you with some information regarding the processing of personal data collected through the channels accessible through the "Tecno SpA - Integrity Line" platform ("Platform")** of a specialized supplier and that the Company has made available to those who intend to send, in accordance with the provisions of the *whistleblowing* procedure (hereinafter, the "**Whistleblowing Procedure**" or "**Procedure**"), a **report with the related documentation ("Report") of the violations indicated in the Procedure itself, in implementation of the provisions of Legislative Decree no. 24 of 10 March 2023 ("Decree")**.

**1. WHAT PERSONAL DATA MAY BE COLLECTED**

If a Report is made, the Company through the Supervisory Body ("**Reporting Manager**" or "**Manager**") as well as the other authorized parties with reference to the following data subjects ("**Data Subjects**") already defined by the Decree:

- (a) reporting person (hereinafter also referred to as the "**Whistleblower**"),
- (b) person involved, person reported, person mentioned in the report and the facilitator,

collect and process the relevant personal data entered by the Whistleblower (e.g. via the free text fields in the registration form) in the Report, such as:

- Identification and contact data such as first and last name, residential address, e-mail, date of birth. The Whistleblower's identification data will not be collected if an anonymous report is made that contains the essential elements required by the Procedure;
- employment-related data such as occupation, function, company role;
- facts, acts relating to any other content of the Report;
- financial and economic data such as information relating to current accounts, credit cards, sums of money, emoluments;
- images, photos, audio and voice;

(collectively, "**Personal Data**").

Reports may be made by accessing the Platform at the following address <https://tecnospa.integrityline.com> . Within the Platform, Reports can be made both in written and oral form thanks to its integrated functions. Oral Reports are made through messaging systems and will be documented, subject to the Whistleblower's consent, either by recording on a device suitable for storage and listening or by transcription. Alternatively, the Report will be documented in writing by means of a detailed report.

Outside the Platform, the Personal Data of the Reports may be processed, at the request of the Whistleblower, with a direct meeting with the Manager of the reports or through the additional external channels provided for by the Decree.

Reports made orally during a meeting requested by the Whistleblower will be documented, subject to the latter's consent, either by recording on a device suitable for storage and listening or by recording and, in any case, archived on the Platform.

The Personal Data of the Referrals received outside the Platform, for example through paper communication addressed to the Manager, will in any case be transferred, stored and processed on the Platform. Where possible, the prior consent of the Whistleblower will be collected.

The Report must not contain facts that are not relevant for the purposes of the Report, nor special categories of personal data, as referred to in Article 9 of the GDPR ("**Special categories of data**", i.e. those from which it may be inferred, inter alia, racial and ethnic origin, philosophical and religious beliefs, membership of political parties or trade unions, as well as state of health, sex life or sexual orientation), nor **data relating to criminal convictions and offences** referred to in Article 10 of the GDPR, except in cases where this is unavoidable and necessary for the purposes of the Report itself.

Without prejudice to the above, the Data Controller hereby makes available to Data Subjects the information relating to the processing of personal data concerning them, possibly reserving the right to provide it again to the Data Subjects at a time after the Report, in order to ensure the effectiveness of the Whistleblowing Procedure and not to compromise any investigations initiated by the Company or the Authorities.

## **2. FOR WHAT PURPOSES PERSONAL DATA MAY BE USED**

- A. Except in cases of anonymous Reporting in which the Whistleblower's identification data is not collected, in all other cases Personal Data will be processed for purposes related to the **receipt and management of the Report** in compliance with the Decree and the Whistleblowing Procedure.

The prerequisite for the processing is the fulfilment of a legal obligation to which the Data Controller is subject *pursuant to* Article 6, paragraph 1, letter c) of the GDPR as provided for by the Decree.

The provision of Personal Data is mandatory, since failure to do so would make it impossible for the Company to comply with the specific legal obligations relating to the management of Reports and, consequently, would not be able to guarantee the protection measures provided for by the Decree in favour of the Data Subjects

- B. Personal Data will be processed for purposes related to the **defence of rights** during judicial, administrative or extrajudicial proceedings and in the context of disputes arising in relation to the Report made. In addition, Personal Data may be processed by the Company for legal purposes or to make claims.

The basis for the processing is the legitimate interest of the Company *pursuant to* Article 6, paragraph 1, letter f) of the GDPR in the protection of its rights. In this case, a new and specific provision is not required, as the Company will pursue this additional purpose, where necessary, by processing the Personal Data collected for the purposes referred to above, deemed compatible with this (also due to the context in which the Personal Data was collected, the relationship between you and the Company, the nature of the data and the appropriate safeguards for their processing, as well as the link between the purpose *under A.* and this additional purpose).

As specified in paragraph 1 above, the Report must not contain Special Categories of Personal Data, except in cases where this is unavoidable and necessary for the purposes of the Report. In this case, the lawfulness of the processing of such personal data is based on Art. 9, second paragraph, letter b) of the GDPR with regard to purpose *under A.*, and Article 9, second paragraph, letter f) of the GDPR with regard to purpose *under B.*

With regard to any data relating to criminal convictions and offences, the condition of legitimacy is to be found on the basis of Article 2-octies of Legislative Decree 196/2003, as amended by Legislative Decree 101/2018 and by **the Decree ("Privacy Code")** - in the fulfilment of the legal obligations referred to in the Decree.

### **3. HOW WE KEEP PERSONAL DATA SECURE AND FOR HOW LONG**

The processing of Personal Data is based on the principles of correctness, lawfulness, transparency, integrity and confidentiality. The processing is also carried out through automated methods designed to store, manage and transmit them. The processing will be carried out using suitable tools and guarantee security and confidentiality through the use of suitable procedures to avoid the risk of loss, unauthorized access, illicit use and dissemination. This is done through the adoption of encryption techniques and the implementation of technical and organizational security measures defined, evaluated and implemented also in the light of an impact assessment pursuant to art. 35 of the GDPR.

The Personal Data contained in the Report will be kept for no longer than 5 years from the date of communication of the final outcome of the reporting procedure or until the conclusion of any judicial or disciplinary proceedings against the Reported or the Whistleblower, in compliance with the confidentiality obligations referred to in Article 12 of the Decree and the principle referred to in Articles 5, Section 1 (e) GDPR (storage limitation).

Personal Data that is manifestly not useful for the processing of a specific Report is not collected or, if collected accidentally, is deleted immediately.

### **4. WHO WE MAY SHARE PERSONAL DATA WITH**

Access to Personal Data will be granted exclusively to the Reporting Manager, as the data processor already appointed pursuant to art. 28 GDPR and art. 29 GDPR and 2-quaterdecies of the Privacy Code.

Subsequently, in the phase of ascertaining the validity of the Report, where it is necessary for needs related to the investigative activities, the Personal Data may be forwarded in compliance with the principle of confidentiality to personnel or to third parties (e.g. consultants) specifically authorized. More detailed information on the Whistleblowing process and the parties involved are available in the Whistleblowing Procedure.

In addition, Personal Data may be communicated, where necessary and under the appropriate conditions, to public authorities (including administrative, judicial and public security authorities).

It should be noted that the provider of the Platform has been designated by the Company as the data processor *pursuant to* Article 28 of the GDPR.

### **5. INTERNATIONAL TRANSFER**

- 6.** *However, the use of the Platform may involve, albeit possibly, access to the same by persons established in countries that do not belong to the European Union (EU) or the EEA. Such access, which may constitute a transfer outside the EEA, in any case, is carried out in compliance with the provisions of Chapter V of the GDPR*

Each Data Subject has the right to ask the Company, subject to the existence of the conditions set out in the GDPR and the Privacy Code:

- a) access to Personal Data, as provided for by art. 15 of the GDPR;
- b) the rectification or integration of Personal Data in the Company's possession deemed inaccurate, as provided for by art. 16 of the GDPR;

- c) the erasure of Personal Data for which the Company no longer has any legal basis for processing as provided for by art. 17 of the GDPR;
- d) the limitation of the way in which the Company processes Personal Data in the event of one of the hypotheses provided for in art. 18 of the GDPR;
- e) the copy of the Personal Data provided to the Company, in a structured, commonly used and machine-readable format and the transmission of such Personal Data to another data controller (so-called portability), as required by Article 20 of the GDPR.

**Right to object:** in addition to the rights listed above, the Data Subject has the right to object at any time, for reasons related to his or her particular situation, to the processing of Personal Data concerning him or her by the Company for the pursuit of its legitimate interest, as provided for in Article 21 of the GDPR.

The Data Subject also has the right to lodge a complaint with the Guarantor for the protection of personal data as provided for in art. 77 of the GDPR, using the references available on the [www.garanteprivacy.it](http://www.garanteprivacy.it) website, or to take legal action.

The aforementioned rights may be limited pursuant to and for the purposes of Article 2-undecies, first paragraph letter f) of the Privacy Code, if the exercise of the same may result in a concrete and effective prejudice to the confidentiality of the identity of the person who reports violations of which he or she has become aware by reason of his or her employment relationship or the functions performed, pursuant to the Decree. In such cases, the rights of the Data Subject may also be exercised through the Data Protection Authority in the manner set out in Article 160 of the Privacy Code. In this case, the Data Protection Authority informs the Data Subject that it has carried out all the necessary checks or has carried out a review, as well as the right of the Data Subject to seek judicial redress.

## **7. CONTACTS**

The contact details of the Company, as Data Controller, are as follows

Tecno S.p.A., with registered office in Milan, Piazza XXV aprile 11, CAP 20154

For any further information regarding the processing of Personal Data and to exercise your rights, you can contact the Company at the following addresses: email E-mail: [privacy@tecnospa.com](mailto:privacy@tecnospa.com) .