

PRIVACY POLICY

on the processing of personal data in the context of Whistleblowing reports pursuant to articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR")

Dear User,

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Dielle S.p.a., with registered office in Via Montegrappa, 142 – 31010 Moriago delle Battaglia (TV) VAT number 00761830264, as data controller (hereinafter the **"Company"** or the **"Data Controller"**), is required to provide you with certain information regarding the processing of personal data collected through the channels 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 (hereinafter **"Report"**) of the violations indicated in the Procedure itself, in implementation of the provisions of Legislative Decree 10 March 2023, n. 24 (hereinafter the **"Decree"**).

1. WHAT PERSONAL DATA MAY BE COLLECTED

If a Report is made, the Company, through the Whistleblowing Committee (hereinafter **"Report Manager"** or **"Manager"**), with reference to the following interested parties (**"Interested Parties"**) already defined by the Decree:

- a. reporting person (hereinafter also **"Reporter"**),
 - b. person involved, person mentioned in the report and the facilitator,
- will collect and process the relevant personal data entered by the Reporting Person (e.g. via the free text fields in the registration form) in the Report, such as:
- identification and contact data such as name and surname, e-mail, telephone number. The identification data of the Reporting Person will not be collected if an anonymous report is made that contains the essential elements required by the Procedure;
 - employment data such as occupation, function, company role;
 - facts, acts inherent 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;
- (hereinafter jointly also **"Personal Data"**).

Reports may be made by sending a registered letter (as better defined by the Procedure) to the Committee. Within the scope of the Procedure, Reports may be made in both written and oral form by requesting a meeting with the Committee or its member.

The personal data of the Reports may be processed, upon request of the Reporting Person, with a direct meeting with the Reporting Manager or through the additional external channels provided for by the Decree. Reports made orally during a meeting requested by the Reporting Party will be documented, with the consent of the latter, either by recording on a device suitable for storage and listening or by verbalization.

The Report must not contain facts that are not relevant to the purposes of the Report, nor special categories of personal data, pursuant to art. 9 of the GDPR (hereinafter also **"Special categories of data"**, i.e. those from which it may be possible to deduce, among other things, racial and ethnic origin, philosophical and religious beliefs, membership of political parties or trade unions, as well as the state of health, sexual life or sexual orientation), nor data relating to criminal convictions and crimes pursuant to art. 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 the Interested Parties the information relating to the processing of personal data concerning them, reserving the right to provide it again to the Interested Parties at a later 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 CAN PERSONAL DATA BE USED

A. Except in the case of anonymous reporting in which the identifying data of the Reporting Person are not collected, in all other cases the 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 basis for processing is the fulfillment of a legal obligation to which the Data Controller is subject pursuant to art. 6, par. 1, letter c) of the GDPR as provided for by the Decree.

The provision of Personal Data is mandatory, since in its absence the Company would be unable to fulfill the specific legal obligations relating to the management of the Reports and, consequently, would not be able to guarantee the protection measures provided for by the Decree in favor of the Interested Parties.

B. Personal Data will be processed for purposes related to the need to defend rights during judicial, administrative or extrajudicial proceedings and in the context of disputes arising in relation to the Report made. Furthermore, Personal Data may be processed by the Company to take legal action or to advance claims.

The basis for processing is the legitimate interest of the Company pursuant to art. 6, par. 1, letter f) of the GDPR in protecting its rights. In this case, a new and specific provision is not required, since the Company will pursue this additional purpose, where necessary, by processing the Personal Data collected for the purposes indicated above, deemed compatible with this one (also by reason of the context in which the Personal Data were collected, the relationship between you and the Company, the nature of the data themselves and the adequate guarantees for their processing, as well as the connection between the purpose under A. and this additional purpose).

As specified in the previous paragraph 1, 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 itself. In this case, the basis for the lawfulness of the processing of such personal data is based on art. 9, second paragraph, letter b) of the GDPR with respect to the purpose under A, and on art. 9, second paragraph, letter f) of the GDPR with respect to the purpose under B.

With regard to any data relating to criminal convictions and crimes, the condition of legitimacy is to be found in art. 2-octies of Legislative Decree 196/2003, as amended by Legislative Decree 101/2018 and by the Decree ("Privacy Code") - in compliance with the legal obligations set forth in the Decree.

3. HOW WE KEEP YOUR PERSONAL DATA SAFE 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 procedures suitable for avoiding the risk of loss, unauthorized access, illicit use and dissemination. This occurs through the adoption of encryption techniques and the implementation of technical-organizational security measures defined, evaluated and implemented also in light of an impact assessment pursuant to art. 35 of the GDPR, such as voice camouflage in voice messaging.

The Personal Data contained in the Report will be retained for no longer than 5 years from the date of communication of the final outcome of the reporting procedure. Personal Data that are manifestly not useful for the processing of a specific Report are not collected or, if collected accidentally, are deleted immediately.

4. WHO WE MAY SHARE PERSONAL DATA WITH

Access to Personal Data will be permitted exclusively to the Reporting Manager within which the personnel has been authorised pursuant to Articles 29 GDPR and 2-quaterdecies of the Privacy Code.

Subsequently, in the phase of ascertaining the validity of the Report, where necessary for needs related to the investigative activities, the Personal Data may be forwarded in compliance with the principle of confidentiality to specifically authorized personnel. More detailed information on the Report management process and the parties involved are available within the Whistleblowing Procedure.

Furthermore, the Personal Data may be communicated, where necessary and the conditions are met, to public authorities (including administrative, judicial and public security authorities).

5. INTERNATIONAL TRANSFER

Personal Data will be processed within the European Economic Area (EEA) and stored on servers located within the same.

6. YOUR DATA PROTECTION RIGHTS AND THE RIGHT TO LODGE COMPLAINTS WITH THE SUPERVISORY AUTHORITY

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

- access to Personal Data, as provided for by art. 15 of the GDPR;
- the rectification or integration of Personal Data held by the Company that is deemed to be inaccurate, as provided for by art. 16 of the GDPR;
- the deletion of Personal Data for which the Company no longer has any legal basis for processing as provided for by art. 17 of the GDPR;
- the limitation of the way in which the Company processes Personal Data if one of the hypotheses provided for by art. 18 of the GDPR occurs;
- a 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 provided for by art. 20 of the GDPR;

to lodge a complaint with the Data Protection Authority as provided for in art. 77 of the GDPR, using the

references available on the website www.garanteprivacy.it, or to take legal action.

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/her particular situation, to the processing of Personal Data concerning him/her by the Company for the pursuit of its legitimate interest, as provided for by art. 21 of the GDPR.

The aforementioned rights may be limited pursuant to and for the purposes of art. 2-undecies, first paragraph, letter f) of the Privacy Code, if the exercise of the same may result in concrete and effective harm to the confidentiality of the identity of the person reporting violations of which he or she has become aware by virtue of his or her employment relationship or the functions performed, pursuant to the Decree.

In such cases, the rights of the interested party may also be exercised through the Privacy Guarantor in the manner set out in Article 160 of the Privacy Code. In such a case, the Privacy Guarantor informs the interested party that it has carried out all the necessary checks or that it has carried out a review, as well as the interested party's right to file a judicial appeal.

7. CONTACTS

The contact details of the Company, as Data Controller, is: privacy@dielle.it

For any further information regarding the processing of Personal Data and to exercise your rights, outside of the hypotheses above, you may contact the Company at the following addresses: email privacy@dielle.it, or by registered letter with return receipt to Dielle S.p.a. - Via Montegrappa, 142 – 31010 Moriago delle Battaglia (TV) - PEC: dielle@pec.dielle.it

In this case, no specific or indirect information regarding your possible status as Reporter (or Interested Party) must be indicated in the communication.

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