

INFORMATIVE NOTICE IN ACCORDANCE WITH ART. 13 AND 14 OF REGULATION (EU) NR. 2016/679 concerning the processing of personal data in the context of whistleblowing reports

In accordance with Articles 13-14 of the European Regulation 2016/679 (**GDPR**), we inform you that GIFLOR SRL, processes the personal data ("Data") of individuals who report alleged misconduct or violations of which they have become aware in the work context, identified by Art. 3, co. 3, of Legislative Decree. 24/2023, as well as the subjects indicated by art. 3, co. 5, of the aforementioned Decree (e.g., facilitators) and subjects other than those indicated above whose personal data are contained in the whistleblowing reports and/or otherwise processed to manage the report (e.g., third-party data) (hereinafter, all the aforementioned subjects, only "**Interested Parties**"). Therefore, in compliance with the principle of transparency, the following information is provided to the Interested Parties.

DATA CONTROLLER: IDENTITY AND CONTACT DETAILS. The Data Controller is Giflor Srl, P.IVA 02296170240, with registered office in Grumolo delle Abbadesse (Vi), Via Palù no. 9 (hereinafter "**Company**" or "**Data Controller**"). For any information, doubt or clarification regarding the processing of the Data, it is possible to contact the Data Controller by sending a communication via registered letter with return receipt to the registered office of the Company or via e-mail to the address: privacy@azienda.it (see below also "RIGHTS OF THE DATA SUBJECT").

PURPOSE OF DATA PROCESSING. The Data are processed for the sole purpose of managing and following up the reports received by the Company pursuant to the whistleblowing legislation concerning the protection of persons who report wrongdoing they have become aware of in the work context (as defined in Legislative Decree No. 24/2023). "*Whistleblowing management*" means both the management of the channel(s) activated by the Company and the management of the reports received (e.g., for the purpose of carrying out the necessary investigative activities aimed at verifying the merits of the fact being reported and the adoption of the consequent measures), in accordance with the procedure adopted by the Company for the management of reports.

CATEGORIES OF DATA PROCESSED. For the fulfillment of the aforementioned purpose, the Controller processes Personal Data contained in the report and those collected in the course of its management. Specifically, as appropriate, the Controller processes:

- Personal Data of a common nature (Art. 6 GDPR) such as, but not limited to, identification data (e.g. first and last name), location data (e.g. residential address), contact data (e.g. phone number, e-mail), job/role, company affiliation, etc;
- Personal data belonging to special categories (Art. 9 GDPR) such as, but not limited to, data revealing racial or ethnic origin, political opinions, religious beliefs, trade union membership, data concerning the health or sex life or sexual orientation of the data subject.
- Judicial data (Art. 10 GDPR), i.e., data relating to criminal convictions and offenses or related security measures.

LEGAL BASIS OF THE PROCESSING. The processing of Data is carried out:

- for personal data of common nature, in accordance with Art. 6, para. 1, lett. c) GDPR, to fulfill a legal obligation to which the Company is subject (Legislative Decree No. 24/2023);
- for personal data belonging to special categories, in accordance with Art. 9, par. 2, lett.b) GDPR, to fulfill a legal obligation to which the Company is subject;
- for judicial data, in accordance with Art. 10 GDPR and 88 GDPR (*). It should be noted that in general, the Company does not process judicial data. Only in the event that: i) the whistleblowing report contains the aforementioned data; ii) the processing of such data is necessary for the management of the report; iii) the cases referred to in Articles 10 and 88 GDPR arise, the aforementioned Data will be processed by the Data Controller. Otherwise, the Data Controller will refrain from the relevant processing, providing where possible to delete them.
(* cf. Data Protection Authority Order No. 304 of July 6, 2023.

Please also note that in the cases expressly prescribed by Legislative Decree 24/2023, data processing will be carried out only with the consent of the reporter. In particular, consent will be required:

- in the cases referred to in Article 12, paragraph 2: for the disclosure, to persons other than those responsible for receiving or following up the report explicitly authorized, of the identity of the reporter and any other information from which such identity may be inferred, directly or indirectly;
- in the cases referred to in Article 12, paragraph 5: for the disclosure of the identity of the whistleblower in disciplinary proceedings, if the charge is well-founded and the knowledge of said identity is indispensable for the defense of the accused;
- in the cases referred to in Article 14, paragraph 2: for documentation, by recording on a device suitable for storage and listening, or by transcription in full of the report made by telephone or other messaging system made available by the Holder;
- in the cases referred to in Article 14, paragraph 4: for documentation, by means of recording on a device suitable for storage and listening, or by means of minutes of the report made verbally during a meeting with the personnel in charge.

METHODS OF THE PROCESSING. The processing of Data is carried out using paper and computer tools, in compliance with the provisions on the protection of personal data and, in particular, with the appropriate technical and organizational measures referred to in Article 32.1 GDPR, as well as with the observance of any precautionary measures to ensure its relative integrity, confidentiality and availability. In particular, we inform you that, in compliance with Legislative Decree No. 24/2023, the Company adopts, among others, the security measure of encryption, in order to ensure the confidentiality of the identity of the reporter, the person involved and the person mentioned in the report as well as the content and related documentation. The processing referred to in this Notice is not subject to automated decision-making processes.

SOURCE OF PERSONAL DATA. NATURE OF PROVISION AND CONSEQUENCES OF REFUSAL. Data, including those of parties other than the whistleblower, are contained in the report and/or collected subsequently in the course of handling the report. The provision of personal data is necessary for the making and handling of a whistleblowing report. Any anonymous reports will be treated as ordinary reports, only if they are adequately substantiated so as to bring out facts and situations related to specific contexts.

CATEGORIES OF RECIPIENTS OF PERSONAL DATA. The Data shall not be disclosed. The personnel in charge of handling the report have been duly authorized to process the Data in accordance with Article 29 GDPR, receiving specific operational instructions from the Data Controller. Please note that, in the event that the report is forwarded to the competent Authorities, the Data may be known and processed by the latter as autonomous Data Controllers. The Data may, also, be communicated to and/or known by service providers of the Data Controller who process them, as the case may be, in their capacity as autonomous Data Controllers (e.g., attorneys) or as Data Processors ex art. 28 GDPR (e.g., external supplier in charge of the maintenance of the reporting channel; external consultants in charge of the management of the reporting). The updated Register of Data Processors is kept at the Data Controller's office and can be consulted at the request of the Data Subject.

DATA TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS. The Data are not transferred to countries outside the European Union/EEA or to International Organizations. Should such a transfer be necessary to achieve the purposes set out in this information notice, the Data Controller guarantees that it will take place in full compliance with the conditions set out in Chapter V of the GDPR (Articles 44 et seq.), in order to ensure that the level of protection of natural persons guaranteed by the GDPR is not undermined. Therefore, the transfer will take place to countries that the European Commission has deemed to ensure an adequate level of protection, either in accordance with Article 44 GDPR or in compliance with specific standard contractual clauses approved by the European Commission pursuant to Article 46 GDPR, provided that the recipient of the data provides adequate safeguards and that the data subjects have enforceable rights and effective remedies. Any exceptions to the above will only take place in compliance with Article 49 GDPR.

RETENTION PERIOD OF PERSONAL DATA. Reports and related documentation shall be kept for as long as necessary for the processing of the report and, in any case, no longer than five years from the date of communication of the final outcome of the reporting procedure, in compliance with confidentiality obligations. It should be noted that after the aforementioned time periods have passed, the Data will be subject to irreversible deletion or anonymization. A longer period of retention of the Data may be determined by legitimate requests made by the Authorities or by the Holder's participation in judicial proceedings involving the processing of the Data.

RIGHTS OF THE DATA SUBJECT. COMPLAINT TO THE SUPERVISORY AUTHORITY. By contacting the Data Controller in the manner indicated in the section "*DATA CONTROLLER: IDENTITY AND CONTACT DATA*" of this notice, the Data Subject has the right to exercise the rights granted to him/her by the GDPR - **within the limits of the provisions of Article 2 undecies of Legislative Decree no. 196/2003 (**)** - i.e. to request: a) access to the Data concerning him/her; b) rectification of the Data; c) deletion of the Data, within the limits provided for by the GDPR; d) limitation of the processing of the Data, if the conditions set forth in Art. 18 GDPR apply; e) portability of the Data in a structured format, in the cases set forth in Art. 20 GDPR; f) opposition to the processing of the Data, pursuant to Art. 21 GDPR. If the Data Subject considers that the processing concerning him or her violates the GDPR, he or she also has the right to lodge a complaint with the Supervisory Authority. Please note that, in Italy, this Authority is represented by the Guarantor for the Protection of Personal Data based in Rome. A Data Subject who is not resident in Italy may bring a complaint before the Supervisory Authority designated in his or her country of residence.

In order to ensure the confidentiality of the Interested Party making the request to exercise their rights, the requests must be received with the indication "*REQUEST FOR EXERCISE OF PRIVACY RIGHTS - WHISTLEBLOWING REPORT*" (in the subject line of the email or on the envelope of the registered letter with return receipt).

() Please note that the rights set forth in Articles 15 to 22 of the GDPR cannot be exercised by request to the Holder or by complaint to the Authority if actual and concrete prejudice to the confidentiality of the identity of the person reporting violations of which he or she has become aware by reason of his or her employment relationship or duties.**