



PRIVACY POLICY - WHISTLEBLOWING

Information on the processing of personal data pursuant to and for the purposes of the articles. 13 and 14 of Regulation (EU) 2016/679 ("GDPR")

1. The Kirey Group and the Regulation (EU) 2016/679

The Kirey Group, a corporate group made up of companies subject to the management and coordination activity pursuant to and for the purposes of article 2359 of the civil code of the parent company Kirey Srl (hereinafter "Kirey Group"), has for years considered it of fundamental importance the protection of the personal data by ensuring that the processing of personal data, carried out with any method, whether automated or manual, takes place in full compliance with the protections and rights recognized by Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, relating to the protection of natural persons with regard to the processing of personal data, as well as the free movement of such data (hereinafter the "Regulation") and further applicable rules on protection of personal data.

The companies of the Kirey Group that will jointly process your Personal Data for the purposes referred to in the following paragraph 3 of this Information are the following:

- **Kirey S.r.l.** with registered office located in Via Benigno Crespi, 57, Milan, registered in the Milan Company Register, Tax Code and VAT number 06729880960, R.E.A. 1910802;
- **Insirio S.r.l.** with registered office located in Viale Castello della Magliana 38, Rome, registered in the Company Register of Rome, Tax Code no. 02198170587, VAT number 01036251005, R.E.A. n. 40673;
- **Bridge Consulting S.r.l.** with registered office located in Via Ippolito Rosellini, 10, Florence, registered in the Company Register of Florence, Tax Code and VAT number 01253270498, R.E.A. 523483;
- **Kirey Security S.r.l.** with registered office located in Via Benigno Crespi, 57, 20159 Milan, registered in the Milan Company Register, Tax Code and VAT number 06195080012, R.E.A. 2643461;
- **Kirey Welfare e Previdenza S.r.l.** with registered office located in Via Benigno Crespi, 57, 20159 Milan, registered in the Milan Company Register, Tax Code and VAT number 12552410156, R.E.A. 1565038;
- **Kubris S.r.l.** with registered office located in Via Benigno Crespi, 57, 20159 Milan, registered in the Milan Company Register, Tax Code and VAT number 10084830966, R.E.A. 2503708;
- **Sibyl S.r.l.** with registered office located in Via Benigno Crespi, 57, 20159 Milan, registered in the Milan Company Register, Tax Code and VAT number 06626020967, R.E.A. 2122766;
- **Sc Kireyest S.r.l.** with registered office located in Sf. Lazar no. 66A 700049 Iasi, Romania, CUI RO29238427;
- **Kirey D.o.o. Nis** with registered office located in Lole Ribara 15, Niš 18000, Serbia;
- **Kirey Kenia Limited S.r.l.** with registered office located in Delta Towers Chiromo Road Westlands Nairobi, Kenya;
- **Kirey Albania** with registered office located in Via "Shyqyri Bëxolli", Entrance A, Floor 3, Suite 9B, Palazzo Intercosat, Municipal Unit n. 10, Tirana Albania;

Kirey S.r.l.

Sole Shareholder

Registered Office: Via Benigno Crespi 57, Milan

Social Capital: Euro 1.089.620,00 f.p.

Tax Code, VAT Number and Milan's Register Number in the business register of Milan: 06729880960

REA Code: MI – 1910802

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- **Kirey Iberia SL** with registered office located in Doctor Pujadas 102-108.08700 Igualada, Barcelona, Spain;
- **MPM Software S.L.U.** with registered office located in C/ Doctor Pujadas, 102-108 Bajos, 08700 Igualada, Barcelona, Spain;
- **Soft MPM Informatica LDA** with registered office located in Rua Joao Chagas, 53, Escritorio C04, Alg é s 1495-072, Portugal;
- **MPM Technology Solution S.A. DE C.V.** with registered office located in Av. Presidente Masaryk 61, 11560, Miguel Hidalgo, Ciudad de Mexico, Mexico;
- **Synergyc AD** with registered office located in Manastirski Livadi Housing Estate, 69, South Tower Bldg, Sofia, Bulgaria.

The aforementioned companies play the role of joint data controllers, meaning these are "two or more companies that jointly determine the purposes and means of the processing" as provided for in Article 26 of the Regulation. In this perspective, for the purposes of this Information the above Companies will be jointly defined as "Joint Data Controllers".

The Joint Data Controllers can be contacted via the following channels:

- writing to the Legal & Compliance Department of the Kirey Group at the parent company Kirey S.r.l., Via Benigno Crespi, 57, Milan;
- by sending an email to the email address privacy@kireygroup.com to the kind attention of the Legal & Compliance Department.

2. Kirey Group Data Protection Officer (DPO).

In order to facilitate relations between you and each Data Controller, the Kirey Group has decided to adopt and appoint the figure of the Data Protection Officer (DPO) as provided for in articles 37-39 of the Regulation. This figure pursuant to the Regulation and the guidelines adopted by Group 29 (WP-29) - a group composed of representatives of all the European supervisory authorities on privacy matters, established under Directive 95/46/EC and replaced by the Committee European Data Protection Authority referred to in Article 68 of the Regulation - must be identified based on its professional qualities and carry out its duties independently. The DPO of the Kirey Group can be contacted by sending a written communication to the email address dpo@kireygroup.com and/or by writing to the Data Protection Officer of the Kirey Group at the parent company Kirey S.r.l., Via Benigno Crespi, 57, Milan (hereinafter defined as "DPO"). The DPO is called upon to carry out the following activities:

- inform and provide advice to the Data Controller, the Joint Data Controllers, the data controller as well as the employees carrying out the Processing regarding the obligations deriving from the Regulation as well as from other provisions of the European Union or Member States relating to the protection of Personal Data;
- monitor and ensure compliance with the Regulation, the applicable regulations regarding the protection of Personal Data as well as the policies and procedures adopted by the Data Controller and the Joint Data Controllers;
- provide support in managing requests from interested parties;
- cooperate with the Personal Data Protection Authority or other competent supervisory authority.

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3. Purpose of the processing, legal basis, retention period and nature of the provision of data

With a view to making specific processing activities more functional both to the interested parties and to their own objectives, all the companies of the Kirey Group as identified in paragraph 2 of this Information, have stipulated a co-controller agreement pursuant to article 26 of the Regulation, with which they have undertaken to jointly carry out the purpose referred to in this paragraph. For this purpose, the Joint Data Controllers have also jointly determined the processing methods and have defined, in a clear and transparent way, the procedures to provide you with timely feedback should you wish to exercise your rights, as provided for in articles 15, 16, 17, 18 and 21 of the Regulation.

The Joint Data Controller companies, in order to guarantee correct management and execution of the joint controllership agreements, have identified the parent company Kirey S.r.l. as the subject to whom the processing activity indicated in this Information should be attributed.

The Joint Controllers may process your Personal Data for the following processing purposes:

- **Reception and management of whistleblowing reports.** *The processing of data is aimed at managing the reception and management (processing and analysis) via the IT platform of reports, adopted by Kirey Group, which may concern violations of internal and external rules governing the Group's activity and the principles and the rules of conduct contained in the Group Code of Ethics, as well as, where adopted, the provisions contained in Model 231, of the Company and/or illicit or fraudulent conduct attributable to employees, managers or third parties by Kirey Group employees, workers and collaborators of companies supplying goods or services and carrying out works in favor of Kirey Group, (so-called whistleblowing), pursuant to Law 30 November 2017, n. 179 and Directive 2019/1937.*

Legal basis: the processing is necessary to fulfill a legal obligation to which the Joint Data Controllers are subject pursuant to Legislative Decree. 24/2023. The processing is, therefore, lawful pursuant to art. 6, par. 1, letter. c) of the GDPR.

Data retention period: personal data are kept for the time necessary to process the report and, in any case, no later than 5 years from the date of communication of the final outcome of the reporting procedure (except for different retention times for the Country of origin).

In the event that legal proceedings are initiated, the aforementioned period may be extended in accordance with the limitation period established by law to possibly assert or defend a right in court against the interested party and/or third parties.

Personal data that is clearly not useful for processing a specific report is not collected or, if collected accidentally, is deleted immediately by the Company.

Nature of the provision: the provision of the personal data of the Reported Party and/or of any persons mentioned and/or involved in the report is necessary for the correct management of the report. Any refusal could, therefore, make it impossible to manage the report in accordance with the Kirey Group Whistleblowing Procedure.

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The provision of the Reporter's personal data is optional. Please note that, in the event that the report is made anonymously, no personal data of the Reporting party will be processed, except in the case in which the Reporting party is subsequently identified.

4. Subjects authorized to process the data

For your protection, only the Kirey Group Whistleblowing Manager is able to associate reports with the identities of the Whistleblowers. If investigative needs require that other subjects, within Kirey Group, must be made aware of the content of the report or the documentation attached to it, the identity of the Reporter will never be revealed, nor will elements be revealed that could, even indirectly, allow its identification. These subjects, since they could still become aware of other personal data, are in any case all formally authorized to process and are specifically instructed and trained for this, as well as required to maintain secrecy regarding what they have learned as a result of their duties.

5. Recipients or categories of recipients of the data

Personal data will not be disclosed. Personal data may, however, be communicated:

- to the Whistleblowing Manager as the person responsible for managing and evaluating reports. The Whistleblowing Manager will act as the data processor duly appointed by the Company;
- to the members of the Supervisory Body (OdV), if the report concerns an offense envisaged by the Legislative Decree. 231/2001;
- to employees or collaborators of the Company possibly involved by the Whistleblowing Manager or the Supervisory Body during the internal investigation phase, who will act as data processors duly appointed by the Company;
- to the Company's external consultants possibly involved by the Whistleblowing Manager or the Supervisory Body during the internal investigation phase, who will act as data controllers duly appointed by the Company.

Finally, the Company may communicate personal data to the competent judicial authorities to respond to subpoenas, comply with orders issued by courts or other legitimate requests from competent authorities; as well as to assert or exercise one's rights or defend oneself in court.

In compliance with the Company's Whistleblowing Procedure, if the internal report is presented to a person other than the one identified and authorized by the Company, this person will immediately transmit the report to the competent person (Whistleblowing Manager), and simultaneous notice of the transmission will be given to the Whistleblower.

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6. Data transfer to a third country and/or an international organization and guarantees

The personal data collected and processed in the management of whistleblowing reports will in no case be transferred outside the EEA countries.

7. Treatment methods

The collection and processing of personal data will be carried out through manual, IT and telematic tools and with logic strictly related to the purposes themselves and, in any case, in such a way as to guarantee the confidentiality and security of the data themselves, including the confidentiality of the Reporter, the Reported and any additional persons mentioned in the report.

Please note that fully automated decision-making processes are not carried out.

8. Rights of interested parties

The interested party will be able to assert their rights pursuant to the articles. 15-22 of the GDPR, by contacting the Data Controller, by sending an email to privacy@kireygroup.com or by writing to the contacts referred to in paragraph 1 of this Privacy Policy.

The interested party has the right, at any time, to ask the Data Controller for access to his/her personal data (art. 15), rectification (art. 16) or cancellation (art. 17) of the same, or the limitation of the processing (art. 18). The data controller communicates (art. 19) to each of the recipients to whom the personal data have been transmitted of any corrections or cancellations or limitations of processing carried out. The data controller communicates these recipients to the interested party if the interested party requests it. In the event that the interested party believes that the processing of personal data carried out by the owner is in violation of the provisions of the GDPR, the interested party has the right to lodge a complaint with the Supervisory Authority, in particular in the Member State in which he habitually resides or works or in the place where the alleged violation of the regulation occurred (the contact details of the Privacy Guarantor are available at the following link: <https://www.garanteprivacy.it/home/footer/contatti>), or to take action in the appropriate judicial offices.

It should be noted, however, that the rights recognized by the articles. 15-22 of the GDPR cannot be exercised by the Reported Party or by any persons mentioned in the report - with a request to the data controller or with a complaint to the competent Supervisory Authority pursuant to Article 77 of the GDPR - if the exercise of these rights can result in an effective and concrete prejudice to the confidentiality of the identity of the Whistleblower.

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