

## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA IN THE CONTEXT OF WHISTLEBLOWING REPORTS

Alfasigma S.p.A., as Data Controller, in compliance with the obligations provided for by art. 13 of the EU Regulation 679/2016 ("GDPR"), provides information on the processing of personal data provided within the management of reports of alleged wrongdoing (so-called whistleblowing) pursuant to Legislative Decree 231/2001, by employees, employees of group companies and third parties (contractors/suppliers) within the scope of the employment relationship, received through the dedicated IT web platform at <https://www.alfasigma.com> called " EthicsALine ".

The Data Controller is Alfasigma S.p.A. with registered office in Via Ragazzi del '99,5 - 40133 Bologna.

Alfasigma S.p.A. has appointed a Data Protection Officer, who can be contacted in matters concerning the processing of your data at the following address: [privacydpo@alfasigma.com](mailto:privacydpo@alfasigma.com).

### Processed data

Reporting may be done either anonymously or personally.

In the case of **anonymous** reports, no processing of the reporter's personal data will take place since it is not possible to ascertain the identity of the person submitting the report. If a report contains personal data referring to other categories of data subjects, its receipt and handling constitutes processing of personal data. The person filing the report is requested not to provide personal data belonging to the so-called 'special' categories under Article 9(1) of the GDPR if this is not strictly necessary.

In the case of reports in **personal** form, the personal data collected and processed by the Data Controller in the context of the management of reports received through the aforementioned platform, in accordance with the principle of data minimization, will be visible if necessary for the purposes of the investigation.

The above-mentioned data may belong to the following categories:

- Common personal data (e.g., details of the person submitting the report, with indication of professional qualification or position);
- Personal data related to the report, i.e. a clear and complete description of the facts that are the subject of the report and of the manner in which they became known (the date and place where the fact occurred; indication of the names and roles of any other persons who may report on the facts that are the subject of the report; information relating to any documents that may confirm the validity of the facts reported);
- Personal data belonging to the so-called 'special' categories under Article 9(1) of the GDPR relating to data subjects that may have been provided by the person submitting the report;
- Personal data of third parties available to the Data Controller also as a result of activities aimed at verifying the validity of the report itself, in compliance with the applicable laws.

### Purpose of processing

The purpose of the processing is the proper and thorough management of the investigative activities aimed at assessing the grounds for the reports sent through the above-mentioned Platform and, where appropriate, the adoption of subsequent measures

### Legal basis for processing

The legal basis for the processing of the above-mentioned data is to be identified:

- for common personal data, in the performance of the contract to which the data subject is a party and to fulfil a legal obligation to which the Data Controller is subject, pursuant to Article 6(1)(b) and (c) of the GDPR, taking into account Article 6(2-bis), (2-ter) and (2-quater) of Legislative Decree 231/2001;
- for personal data belonging to the so-called 'special' categories, in the application of Article 9(2)(b) of the GDPR in order to fulfil obligations and exercise specific rights concerning labour and social security law and social protection; sub-paragraph (f) to establish, exercise or defend a right in court.

### Compulsory/voluntary nature of data provision

The provision of personal data for the above-mentioned purpose is optional for the whistleblower, since it is possible to report anonymously, and, in the event of failure to provide such data, it may not be possible to take charge of and manage the report on the basis of the company procedure.

With regard to the whistleblower, it is guaranteed that no form of retaliation or discriminatory measures, direct or indirect, affecting working conditions will be carried out for reasons directly or indirectly linked to the report.

## Processing methods

Your personal data will be processed electronically in the @WHISTLEBLOWING APPLICATION SOFTWARE of the company BDO ITALIA S.p.A., in compliance with applicable regulations, including security and confidentiality profiles and inspired by the principles of fair and lawful processing.

## Scope of knowledge and communication of data

Personal data contained in reports received by the Controller will not be disseminated. Your data may be shared with the following entities:

- Personnel authorised to process personal data and duly instructed in accordance with Article 29 of the Regulation and the operating procedures that make up the Organisation, Management and Control Model (specifically, the Controller's Supervisory Board as the person authorised to process the data with regard to the receipt and examination of reports);
- The provider of the IT platform for the management of reports, who acts as data controller within the meaning of Article 28 of the GDPR;
- Entities and authorities in their capacity as autonomous data controllers to whom it is mandatory to disclose personal data by virtue of legal provisions or orders by the authorities, in particular in connection with investigative activities relating to reported facts about which the existence of ongoing investigations by public authorities is known.

The complete and up-to-date list of recipients of personal data can be obtained from the Data Controller and/or the DPO at the above-mentioned addresses.

In any case, the utmost confidentiality of your identity will be guaranteed in accordance with corporate procedures. In particular, in the case of transmission of the report to other structures/organisations/third parties for the performance of investigative activities, priority will be given, where possible, to forwarding only the content of the report, excluding all references from which it is possible to trace the identity of the whistleblower, even indirectly.

## Data retention period

Personal data will be kept only for the time strictly necessary for the purposes of managing the investigation, verifying the grounds of the report and taking the appropriate measures, in compliance with the principle of minimisation set out in Article 5(1)(c) of the GDPR.

The Data Controller reserves the right, however, to retain the aforementioned personal data also for as long as is necessary for the fulfilment of regulatory obligations and to meet any defence requirements.

## Storage times

Personal data will be kept only for the time strictly necessary for the purposes of managing the investigation, verifying the grounds of the report and adopting the relevant measures, in compliance with the principle of minimisation set out in Article 5(1)(c) of the GDPR.

Specifically, these data will have different retention periods depending on the findings of the reports:

- Each report will be classified within a month;
- In the event that the report is classified as **non-relevant**, as it is deemed to concern acts and facts not relevant to the Company, or as **non-verifiable**, the personal data it contains will be stored for a maximum of one month after classification;
- If the report is classified as **inherent and verifiable**, the personal data it contains will be stored for a maximum of two months after the conclusion of the investigation, with the following exceptions:
  - ✓ If disciplinary proceedings are taken as a result of the report, the personal data contained therein will be kept in accordance with the procedural time limits laid down in the applicable labour law, and in any case no longer than six months;
  - ✓ If a judgment is brought as a consequence of the report, the personal data contained therein will be retained until the judgment has become final.

## Data Transfer

The management and storage of personal data will take place on servers, located within the European Union, of the Data Controller and/or of third party companies appointed and duly nominated as Data Processors.

Data are currently not transferred outside the European Union.

It is in any case understood that the Data Controller, should it become necessary, will have the right to move the location of the servers, currently in Italy, within the European Union and/or to non-EU countries.

In such a case, the Data Controller hereby ensures that the transfer of data outside the EU will take place in accordance with Articles 44 ff. of the GDPR and the applicable legal provisions by entering into agreements guaranteeing an adequate level of protection, if necessary.

### **Rights of the data subject**

We inform you that with reference to the data processed, you may at any time exercise your rights under Articles 15, 16, 17, 18, 20, 21 and 22 of the Regulation; in particular, you have the right to obtain confirmation of the existence or non-existence of the data and, if so, access to it and to verify its accuracy.

You also have the right to request rectification of your data, erasure, restriction of processing, portability of your data, as well as to object to processing in whole or in part for legitimate reasons, to revoke your consent, if any, and to lodge a complaint with a Supervisory Authority or take legal action.

Please bear in mind that if you ask for your Personal Data to be erased, we may not be able to respond to your report or conclude the investigation.

Your rights may be exercised towards Alfasigma S.p.A. by means of a written request, using the form that you can download from the website <http://www.alfasigma.com/it/privacy-policy> , to be sent to the e-mail address: [privacy@alfasigma.com](mailto:privacy@alfasigma.com) or, if present, by means of the form accessible at the foot of the page of the website, under the heading "Rights of the data subjects".

Data Controllers will provide you with information regarding the action taken regarding your request under Articles 15 to 22 without undue delay and, in any event, no later than one month after receipt of your request. This period may be extended by two months if necessary, taking into account the complexity and number of the requests. The data controller will inform you of this extension, and of the reasons for the delay, within one month of receipt of the request.

Should you believe that the processing of your data carried out by Data Controllers is in breach of the provisions set out in the GDPR, you have the right to lodge a complaint with the Data Protection Authority, as provided for by art. 77 of the GDPR itself, or to take legal action pursuant to art. 79 of the GDPR.

**Data Controllers**  
Alfasigma S.p.A.