

1. WHISTLEBLOWING PERSONAL DATA PROCESSING POLICY

PERSONAL DATA PROCESSING POLICY PURSUANT TO ARTICLES 13-14 OF REGULATION (EU) 2016/679 RELATING TO WHISTLEBLOWING POLICY

With this information notice GRUPPO PIAZZETTA S.p.a. (hereinafter referred to as "Company") intends to provide the indications required by Articles 13 and 14 of Regulation (EU) 2016/679 (or "General Data Protection Regulation" - "GDPR"), regarding the processing of personal data carried out by the Company within the scope of its "Whistleblowing Policy", adopted in accordance with Legislative Decree 10 March 2023 no. 24¹ and, in particular, of all activities and fulfilments related to the functioning of the company system for the management of *whistleblowing* reports.

The following information is provided to the "whistleblowing" persons and all other potentially "interested" persons, such as, for example, the persons indicated as possibly responsible for the unlawful conduct, any "facilitators" (as defined by the reference legislation), as well as any other person in different capacities involved in the "Whistleblowing Policy".

1. **Data Controller and DPO - "Data Protection Officer"**

The Data Controller of personal data is GRUPPO PIAZZETTA S.p.a., with registered office in Asolo (TV) - Italy, Via Montello 22, which can be contacted via email: privacy@gruppopiazzetta.com. The Data Controller has appointed a Data Protection Officer (DPO), who can be contacted by writing to the following address: dpo@gruppopiazzetta.com.

2. **Categories of personal data processed and purposes of processing**

According to the approach of the regulations in question, personal data may be acquired by the Company insofar as contained in *whistleblowing* reports, or in the acts and documents attached to them, received by it through the channels provided by the aforementioned Policy.

The receipt and handling of such reports may give rise, depending on their content, to the processing of the following categories of personal data:

- a) common personal data referred to in Article 4 (1) of the GDPR, including, for example, biographical data (first name, last name, date and place of birth), contact data (landline and/or mobile phone number, postal/email address), job role/occupation;
- b) "special" personal data under Article 9 of the GDPR, including, for example, information related to health conditions, political opinions, religious or philosophical beliefs, sexual orientation or trade union membership;
- c) "judicial" personal data referred to in Article 10 of the GDPR, relating to criminal convictions and offenses, or related security measures.

With regard to the aforementioned categories of personal data, **we emphasize the importance that the reports forwarded be free of information manifestly irrelevant for the purposes of the reference discipline**, inviting in

¹ Legislative Decree implementing Directive (EU) 2019/1937 of the European Parliament and Council of 23 October 2019.

particular the reporting parties to refrain from using personal data of a "particular" and "judicial" nature if not deemed **necessary and unavoidable** for the purposes of the same, in compliance with Article 5 of the GDPR.

The aforementioned information will be processed by the Company - the Data Controller - in accordance with the provisions prescribed by Legislative Decree No. 24/2023 and, therefore, in general, **in order to carry out the necessary preliminary activities aimed at verifying the validity of the facts being reported and the adoption of the consequent measures.**

In addition, the data may be used by the Data Controller for **purposes related to the need to defend or ascertain one's rights** in the context of judicial, administrative or extrajudicial proceedings and in the context of civil, administrative or criminal litigation arising in relation to the report made.

3. Legal basis of the processing of personal data

The legal basis for the processing of personal data is mainly constituted by the **fulfillment of a legal obligation** to which the Data Controller is subject - art. 6, par. 1 (c) of the GDPR - which, in particular, by virtue of the aforementioned legislation, is required to implement and manage information channels dedicated to receiving reports of unlawful conduct detrimental to the integrity of the Company and/or the public interest.

In the cases covered by the same regulations, a **specific and free consent may be requested from the reporting person** - pursuant to Article 6, par. 1 (a) of the GDPR - and, specifically, where there is a **need to disclose his or her identity**, or where the **recording of reports collected orally**, or through direct meetings with the Reporting Manager, is envisaged.

The processing of "special" personal data, which may be included in the reports, is based on the **fulfillment of obligations and the exercise of specific rights of the Data Controller and the interested party in the field of labor law**, pursuant to Article 9, par. 2 (b) of the GDPR.

As for the purpose of ascertaining, exercising or defending a right in court, the relevant legal basis for the processing of personal data is constituted by **legitimate interest of the Data Controller** in this sense, pursuant to art. 6, par. 1 (f), of the GDPR; for the same purpose, the processing of personal data of a "special" nature, if present, is based on art. 9, par. 2 (f) of the GDPR.

4. Nature of the provision of personal data

The provision of personal data is compulsory since, in accordance with the company's "Whistleblowing Policy," anonymous reports, i.e., reports from which it is not possible to obtain the identity of the reporter, are not taken into consideration. The personal data provided will be processed to manage the report according to the limits and with the guarantees of confidentiality imposed by the reference legislation.

5. Processing methods and retention period of personal data

The processing of personal data included in the reports forwarded in accordance with the "Whistleblowing Policy" will be carried out by the subjects "in charge-authorized" by the Company and will be based on the principles of fairness, lawfulness and transparency, as per Article 5 of the GDPR.

The processing of personal data may be carried out in analogical and/or computer/telematic modes, functional to store, manage and transmit the data, in any case in application of appropriate measures, of physical, technical and organizational type, designed to ensure their **security and confidentiality at every stage of the procedure, including the archiving of the report and related documents** - subject to the provisions of art. 12 of Legislative Decree no. 24/2023 - with particular reference to the identity of the reporting person, the persons involved and/or otherwise mentioned in the reports, the content of the same and related documentation.

Reports received by the Company, together with the enclosed acts and documents, will be retained for as long as necessary for their management and, in any case, as provided for in the regulations, **for a period not exceeding five years from the date of the communications of their final outcomes.** After that period, the reports will either be deleted from the system or stored in an anonymized form.

Consistent with the guidance provided in paragraph 1, personal data included in reports that are manifestly irrelevant to the purposes of the reports will be deleted immediately.

6. Areas of communication and transfer of personal data

In addition to the internal figures specifically authorized by the Data Controller, the personal data collected may also be processed, within the framework of the "Whistleblowing Policy" and in pursuit of the purposes indicated, by providers of advisory and assistance services in the implementation of the "Whistleblowing Policy", who, if the conditions are met, will process the data as Data processing officers.

If necessary, personal data may be transmitted to the Judicial Authorities and/or Police Bodies who request it in the context of judicial investigations.

Personal data will be processed within the European Economic Area (EEA) and stored in servers located there.

Under no circumstances will personal data be disseminated.

7. Rights of the interested parties

Each interested party has the right to exercise the rights referred to in articles 15 and following of the GDPR, in order to obtain from the Data Controller, for example, access to their personal data, the rectification or cancellation of the same or the limitation of the processing that concerns them, without prejudice to the possibility, in the absence of satisfactory feedback, to lodge a complaint with the Guarantor Authority for the protection of personal data.

To exercise these rights, it is necessary to forward a specific request in free form to the following address of the Data Controller: *privacy@gruppopiazzetta.com*, or send the form available on the website of the Guarantor Authority for the protection of personal data to the same address.

In this regard, we inform you that the aforementioned rights of the interested parties in the processing of personal data may be limited pursuant to and for the purposes of art. 2-*undecies* of Legislative Decree no. 196 of 30 June 2003 (Italian "*Personal Data Protection Code*", as amended by Legislative Decree no. 101/2018), for the time and within the limits in which this constitutes a necessary and proportionate measure, if their exercise could result in a concrete and effective prejudice to confidentiality of the identity of the reporting persons.

In such cases, interested parties will still have the right to contact the Guarantor Authority so that the latter can assess whether the conditions for acting in the manner provided for in Article 160 of Legislative Decree no. 196/2003 are met.