

Privacy policy pursuant to Data Protection Act – Whistleblowing

Pursuant to Article 13 of Regulation (EU) no. 2016/679 (General Data Protection Regulation, hereinafter GDPR), and Legislative Decree 24/2023, LAZZERINI S.p.a., in its capacity as Data Controller, provides the following information on the processing of personal data in relation to the management of Reports regulated by the LAZZERINI Whistleblowing Procedure.

1. CATEGORIES OF PERSONAL DATA

- a) Common personal data pursuant to Article 4(1) of the GDPR of the Reporter (in the case of non-anonymous Reports), as well as of any Persons involved or referenced in the Report and Facilitators, as defined in the Whistleblowing Procedure (hereinafter, "Data Subjects"); including; personal data (e.g. name, surname, date and place of birth), contact information (e.g. landline and/or mobile telephone number, physical/ email address).
- b) Processing of special categories of personal data as per Article 9 of the GDPR, if included in the report.

2. PURPOSE OF PROCESSING AND LEGAL BASIS.

The aforementioned personal data are processed by the Controller for the following purposes:

- a) to manage the Report submitted pursuant to Legislative Decree no. 24/2023;
- b) to fulfil the obligations provided for by the law or EU legislation;
- c) to defend or establish one's rights in civil, administrative or criminal litigation.

The legal basis of the processing consists of:

- for the purposes referred to in letter (a), compliance with a legal obligation to which the Data Controller is subject (Art. 6 (1)(c) of the GDPR); moreover, for filed reports collected via phone or voice messaging systems or in any case in verbal form, the Reporter's consent (Art. 6 (1)(a) of the GDPR);
- for the purposes referred to in letter b), compliance with a legal obligation to which the Data Controller is subject (Art. 6 (1)(c) of the GDPR).
- for the purposes referred to in letter c), the legitimate interests pursued by the controller (Art. 6 (1)(f) of the GDPR)

Data provision is necessary in order to achieve the aforementioned purposes; failure to provide said data, or its partial or inexact provision, may result in it being impossible to manage the report.

3. STORAGE OF PERSONAL DATA.

LAZZERINI S.p.A. stores the personal data in accordance with the terms set out by Art. 14 of Legislative Decree no. 24/2023, that is, for the time necessary to manage the report and, in any case, for no more than 5 years from the date the final outcome of the Report is communicated to the Reports Manager. Personal data that are clearly not useful for the processing of a specific report are not collected, or, if accidentally collected, are promptly deleted.

4. METHOD AND LOGIC OF PROCESSING

The data are processed manually and/or using automated computerised and or electronic tools

with logics related to the aforementioned purposes and, in any case, in such a way as to ensure security and confidentiality. The Report management system ensures, at every stage, the confidentiality of the identity of the Reporter, of the Persons involved and/or in any case referenced in the Report, of the content of the Report and the relative documentation, without prejudice to the provisions of Art. 12, Legislative Decree no. 24/2023.

5. CONTROLLER, INTERNAL DATA PROCESSOR AND CATEGORIES OF PERSONS AUTHORISED TO PROCESS DATA AT LAZZERINI.

The Data Controller is LAZZERINI S.p.A., with registered office in Via Viale G. Peralisi, 21 – 60030 Monsano (AN) Italy.

The Controller has nominated an autonomous and independent Data Processor to manage Whistleblowing Reports, who is responsible for managing reports regulated by the Whistleblowing Procedure, registered at the Company's registered office, appointed as the person authorised to process personal data and who has therefore received suitable operating instructions.

6. RIGHTS OF THE DATA SUBJECT.

The data subject, in the persons of the Reporter or Facilitator, has the right to access the data concerning them at any time and to exercise the rights provided for by Articles 15 to 22 of the GDPR, to the extent they apply (right of access by the data subject, right to rectification, right to erasure or to be forgotten, right to restriction of processing, right to data portability, right to object), by sending an email to the Reports Manager: Marco Cruciani <marco.cruciani@tribnet.it>.

Moreover, the data subject has the right to file a claim to the Data Protection Authority. The aforementioned rights shall be restricted for the person in question or the individual referenced in the report, as deemed necessary and proportionate in accordance with Art. 2 *undecies* of the Privacy Code, as the exercise of such rights could result in effective and tangible harm to the confidentiality of the reporter's identity.