

INFORMATION ON THE PROCESSING OF PERSONAL DATA
as part of the Company Management System - Whistleblowing system

1. THE DATA CONTROLLER.

At any time, you can contact the company CORMAS S.p.A. with registered office in Creazzo (VI), Via Fabio Filzi n. 46, P.I. 01700540246, "Data controller", at the e-mail address privacy@cormas.it for information and/or report any problems.

2. CATEGORIES OF PERSONAL DATA PROCESSED

As part of the process of acquisition and management of reports will be processed personal data of the reporting entity, the reported entity and other categories of data subjects, as persons involved and/or linked to the reporting process and/or the facts covered by the report.

This information may include **common personal data** (e.g. personal data, contact data, data relating to the activity of the data subject, other data contained in the report and/or attached documentation or collected during the reporting management process, etc.) and, insofar as it is strictly necessary to pursue the purposes of processing described below, personal data belonging to **particular categories** referred to in art. 9 of the GDPR (e.g. data relating to health, trade union membership, data suitable to reveal racial origin, political opinions, religious or philosophical beliefs of the data subject, etc.) or data relating to **criminal convictions** and crimes referred to in art. 10 of the GDPR.

3. DATA SOURCE

Personal data will be collected directly from the data subject or from third parties, through the reporting carried out according to the tools made available by the Company, or acquired during the reporting management process.

4. PURPOSE OF THE TREATMENT, LEGAL BASIS AND CONSERVATION TIMES

Personal data will be processed for the following purposes and in compliance with the legal bases as better specified. In particular:

A) for the management of the report and the adoption of the consequent measures in fulfillment to the provisions of the Directive (EU) 23 October 2019, n. 193 and the national transposition legislation: Legislative Decree 10 March 2023 n. 24. In this case, the legal basis of the treatment is the need to fulfill the obligations imposed by the legislation on whistleblowing, (art. 6, par. 1, lett. C), art. 9 par. 2, lett. b) as well as art. 10 of the GDPR).

If it is necessary to reveal the identity of the reporting to subjects other than those who manage the reporting procedure, the data controller will proceed to request the reporting an express and specific consent to the reporting.

Personal data will be processed for the strictly necessary time and will be kept for a period not exceeding 5 years. After this term, the data will be destroyed, deleted or made anonymous, compatibly with the technical procedures of cancellation and backup.

5. PROVISION OF DATA.

The provision of data must be considered **mandatory** for the performance to follow up any reports received and to be able to pursue the purposes as identified above. Refusal to provide data does not allow the establishment or continuation of the employment relationship.

6. METHOD OF DATA PROCESSING. CATEGORIES OF SUBJECTS TO WHOM THE DATA CAN BE COMMUNICATED OR WHO MAY BECOME AWARE OF IT AS EXTERNAL MANAGERS, AUTHORIZED SUBJECTS AND AUTONOMOUS OWNERS

Profiling is **excluded** and the data will not be disseminated.

For the pursuit of the purposes indicated above, the data controller will be able to **communicate and have personal data processes**, in the national field, to third parties with whom he has relationships, and in particular:

- a) As regards the authorized subjects to the treatment, the **subjects responsible for the disciplinary procedure** must be understood if it can be applicable and operated;
- b) The data may be processed, on behalf of the Data Controller, by **subjects designated as Data Processors**, including the manager of reports or professional study generically understood that they can provide advice or assistance of any kind to the data controller;
- c) Data may be communicated to subjects operating as data controllers, including the National Anti-Corruption Authority, the Judicial Authority, the Court of Auditors and other public authorities involved.

7. TRANSFER OF EXTRA-EU DATA.

Personal data will not be transferred to countries not belonging to the European Union.

8. RIGHTS OF THE INTERESTED PARTY.

We remind you that it is your faculty to exercise the rights established by articles 15 to 22 of EU Regulation 2016/679, which consist in the prerogatives listed below:

- a) right to obtain confirmation that personal data concerning you **are being processed or not** and in this case, **to obtain access** to personal data and information referred to in art. 15, on the purpose of the processing, on the

categories of personal data in question, on the recipients to whom the data have been or will be communicated; the retention period of the data; right to know the existence of an automated decision-making process;

- b) Right to obtain the **rectification** of inaccurate personal data that concern you without unjustified delay. Taking into account the purposes of the processing, it has the right to obtain the integration of incomplete personal data, also providing an integrative declaration;
- c) right to obtain the **cancellation** of personal data concerning you without unjustified delay;
- d) right to obtain the **limitation** of the processing of data in the event of contestation of the correctness of the data, in the event of illegal processing, interest in the processing for the assessment, exercise or defense of a right in judicial, opposition to treatment pending verification of the possible prevalence of the legitimate reasons of the data controller compared to those of the interested party;
- e) be informed in case of **rectification or cancellation** of personal data or limitation of the processing carried out pursuant to article 16, article 17, paragraph 1, and article 18, of EU Regulation 2016/679, unless this is reveal impossible or implies a disproportionate effort;
- f) right to the **portability** of personal data concerning you, if applicable;
- g) oppose at any time, for reasons connected to your particular situation, to the processing of personal data concerning you pursuant to article 6, paragraph 1, letter f);
- h) right to propose a **complaint** to a control authority, if the data are not collected at the interested party;

The complete list of the rights of the interested party is available on www.garanteprivacy.it.

Interested parties are informed that, pursuant to art. 2-undecies of D.Lgs. 196/2003, the aforementioned rights cannot be exercised, when the exercise of these rights can result in an effective and concrete prejudice to the confidentiality of the identity of the signaler also in compliance with the provisions of D. Lgs. 24/2023. In this case, the exercise of the rights will be carried out in accordance with the provisions of the law or the applicable Data Protection Regulation, also through a request for particular investigations to the Guarantor Authority pursuant to art. 160 of D.Lgs. 196/2003.

9. **METHODS OF EXERCISING THE RIGHTS OF THE INTERESTED PARTY.**

At any time you have the right to exercise the aforementioned rights by sending an email to the data controller, with the object "**REF. PRIVACY**", at the e-mail address indicated in paragraph 1.

Cormas S.p.A.