

**Policy ex art. 13 EU regulation 2016/679 (or "GDPR")
on "WHISTLEBLOWING"**

This information is given to all interested subjects during procedures for managing reports of illicit conduct acc. to Legislative Decree. 24/2023 and consequently of the reporting subject (Whistleblower), the facilitators, colleagues and/or of people working in the same context, as well as eventual reported subject.

Data controller

F.lli Vergnano s.r.l. with headquarters in Chieri (To), Corso Olia n° 2, acting as data controller (hereinafter "**Data Controller**") acc. to EU Regulation 2016/679 (hereinafter, "**Regulation**" or "**GDPR**") informs you that he will process your personal data collected during reports of violations of national or European Union normatives that damage the public interest or the integrity of the Data Controller (hereinafter "**Whistleblowing Report**") acc. to Legislative Decree 24/2023 for the purposes and as specified below.

The Data Controller announces that he designated an external Data Protection Officer ("**Data Protection Officer**" or "**DPO**") who can be reached at the following address: dpo@vergnano.com.

Types of data, purposes and legal basis of processing

The personal data processed will be those provided by you, or otherwise collected in the context of the received reports. In particular, those data could be personal, registry, contact data, eventually particular data, including judicial data, if provided in the report context. The Data Controller invites you not to provide data that are not strictly necessary for the Whistleblowing Report.

In any case he gives notice that he has adopted reporting channels that guarantee the non-traceability of the whistleblower. Personal data that are clearly not useful for processing a specific report are not collected or, if accidentally collected, are deleted immediately.

Types of data processing: the data may be collected, recorded, arranged, structured, stored, consulted, used and communicated.

Your data are processed with the following **aim**: to receive, analyze and manage the Whistleblowing Report. Kindly note that once the Whistleblowing Report has been managed, its content could be further used for the judicial protection of the Data Controller and for the necessary **defense actions**. In this case the legal basis for the processing of such personal data is the legal interest of the Data Controller (art. 6, par. 1, letter f) of the GDPR).

The Whistleblowing Report could also be used to define disciplinary actions or sanctions in case that a specious, retaliatory or discriminatory behavior is realized against the reported subject or the person making the report. This processing is carried out on the basis of the applicable regulatory provisions (Legislative Decree 24/2023).

The **legal basis** for the processing of personal data with this aim is found in the compliance of a legal obligation to which the Data Controller is subject (art. 6, par. 1, letter c) of the GDPR), in particular as provided by the Legislative Decree 24/2023.

It is specified that, if you have decided to make your identity known, your personal data will be processed only by authorized person who is committed to confidentiality, being understood the communication obligations prescribed by law.

Recipients of personal data

Your personal data may be shared, in the strictly necessary measure, for the above aims with:

- responsible monocratic and collegial Organizations of the Data Controller and the only subjects strictly necessary to follow up on the Whistleblowing Report who are committed to confidentiality, including the **facilitator**, if existing;
- **subjects, organizations or authorities** to whom it might be mandatory to communicate your personal data acc.to legal provisions or orders of the authorities, including the A.N.A.C.;
- **any external legal consultants** for the acquisition of opinions regarding the correct application of the legislation or for the exercise of specific activities reserved to them by law, as well as **platform suppliers** with whom the Data Controller has stipulated contracts for the processing of personal data and who act as Co- Controllers or External Responsible of the treatment, always with the maximum confidentiality.

Data processing methods

The processing of your personal data will be made both automatically and manually, guaranteeing the security and confidentiality of your personal data. This with particular reference to the reporting person's data which will be protected by anonymity (unless he chooses to make his identity known). In any case, the report and all subsequent related activities will be managed and protected by absolute confidentiality in compliance with legal obligations

Transfer of data outside the EU

The Data Controller, for the processing activities described above, does not transfer personal data outside the European Economic Area, having adopted a platform that guarantees the storage and treatment of data in Italy. More information are available by the Data Controller.

Storage of personal data

Whistleblowing Reports will be managed within three months from the date of its submission. In the event that a particularly complex investigation becomes necessary, the deadline may be extended, but only if exist valid needs and in any case with the objective of concluding the reporting process in the shortest and most reasonable possible time.

The Whistleblowing Reports and the related documentation are stored for the time necessary to manage the Whistleblowing Report and in any case no longer than five years starting from the date of communication of the final result of the Whistleblowing Report procedure, in compliance with the confidentiality obligations acc. 12 Legislative Decree. 24/2023 and the principle referred to art. 5, paragraph 1, letter e), of the Regulation. At the end of this period, the cancellation of both the report and all the related documentation is foreseen, unless actions are taken before the judicial or accounting authority: in that case the relevant discipline will find application also for the storage of the data acquired in the whistleblowing report.

Kindly note that acc. to art. 2 *undecies* Legislative Decree. 196/2003, the rights referred to articles 15 to 22 of the Regulation cannot be exercised with a request to the Data Controller or with a complaint acc. to article 77 of the Regulation, if the exercise of these rights could cause an effective and concrete prejudice to the confidentiality of the identity of the person making a Whistleblowing Report. That prejudice will be valued case-by-case, in concrete terms, and only if it is a necessary and proportionate measure. If the Data Controller decides to use this limitation, you will be promptly notified by written form. We remind you that, in these cases, your rights can also be exercised through the Guarantor acc. art. 160 of Legislative Decree. 196/2003 and ss.mm.

Requests must be sent in written form to the Data Controller at privacy@vergnano.com or to the DPO at dpo@vergnano.com.

In any case, you have the right to submit a complaint to the competent Supervisory Authority (Guarantor for the Protection of Personal Data), acc. to art. 77 of the Regulation, if you believe that the processing of your personal data is contrary to the legislation in force, unless the limits acc. art. 2 *undecies* of the Legislative Decree. 196/2003 mentioned above.