

## Privacy policy pursuant to Articles 13 and 14 of Reg. EU 679/2016

### Whistleblowing reports

Dear Sirs,

The Company Alberto Sassi S.p.A. - VAT Reg. No.: 01994221206 - with registered office in Valsamoggia (BO), Via Guido Rossa 1, in its capacity as Controller (hereinafter, "Controller"), hereby intends to provide information on the characteristics and methods of the processing of personal data of persons reporting breaches of (national or Union) regulations that harm the interest or integrity of the Company, which they have become aware of in a work-related context, in compliance with the applicable *whistleblowing* regulations, with particular reference to D.Lgs. 24/2023 implementing Directive (EU) 1937/2019 (hereinafter also the "Decree") and within the process implemented by Alberto Sassi S.p.A. to acquire and manage such internal reports.

The reports are managed as provided for in the *whistleblowing procedure* adopted by Alberto Sassi S.p.A. and made available in the specific section of the company website. The data subjects of this policy are the recipients of the above-referred procedure, who are recommended to read it carefully, or the persons referred to in the report.

The personal data provided by you in your capacity as reporting person (hereinafter also referred to as "whistleblower") and the information contained in the reports and any annexed documents, will be processed in accordance with the principles of correctness, lawfulness, transparency and protection of the confidentiality and rights of the data subjects, in compliance with the obligations laid down in the privacy regulations (D.Lgs. 196/2003 as amended, Reg. (EU) 679/2016, hereinafter "GDPR"), D.Lgs. no. 24 of 10 March 2023, the ANAC whistleblowing guidelines and D.Lgs. 231/01 where applicable.

As suspected breaches may also be reported in anonymous form, you are not required to provide your personal data when forwarding the report. If you decide to provide your personal data, this information will be processed in compliance with the above-referred legal bases and, in any case, managed in compliance with the provisions of Legislative Decree No. 24 of 10 March 2023.

However, also in relation to anonymous reports, it cannot be excluded that, during their investigation, the Controller - where necessary through their data processors - may come into the possession of personal information concerning other categories of data subjects (e.g. persons other than the whistleblower, third parties, etc.), which will therefore be processed pursuant to this policy.

Therefore, during the process of acquisition and management of the report, the Company Alberto Sassi S.p.A. will process any personal data provided by the Whistleblower, and the data of other categories of data subjects, as persons concerned and/or connected to the reporting process, guaranteeing full confidentiality.

#### 1. Purpose of the processing and categories of data processed

The personal data processed by the Controller in compliance with the provisions of the *whistleblowing procedure*, may include, but not limited to, common personal data, such as:

- the whistleblower's data (e.g.: name, surname, e-mail address, any other contact details given by the whistleblower, etc.), where notified in the report;
- personal data contained in the reports submitted, also orally on the platform (e.g.: personal data - identification and professional data - and any other personal information concerning the whistleblower, the person reported and/or any third parties concerned by the report).

It is specified that the personal data will be collected directly from the data subject or from third parties, as better specified in the *whistleblowing procedure*, in written form (on the IT platform) or oral form (e.g. during the meeting requested by the whistleblower with the persons in charge of managing the report) and processed in compliance with the above-referred regulations.

In any case, the Controller adopts all statutory guarantees to protect the confidentiality of the whistleblower's identity, ensuring that it is not disclosed to third parties without their express consent.

Reports must exclusively contain necessary information for substantiating the matters reported. If the reports contain personal information that is not required to pursue the above-mentioned purposes, the Company will destroy it, or if this is not possible, conceal it, unless authorised by law or by a provision of the Data Protection Authority.

## 2. Purpose, legal basis of the processing and the consequences of the failure to provide data

Data are processed lawfully and correctly according to the purposes described below.

### A. Need to fulfil legal obligations

This need is the legal basis for the processing, as in the acquisition and management of the reports, the Controller is required to fulfil legal obligations, particularly those laid down in D.Lgs. 24/2023 and, where applicable, D.Lgs. 231/01.

The provision of data for these purposes is optional. You may decide not to provide any data: in this case, the Controller may not be able to follow up on the report.

In any case, the opportunity to provide only the data required to describe the reported facts, avoiding all unnecessary personal data for that purpose, is underlined. In any case, the whistleblower's identity will be protected from the time of receipt onwards.

### B. Consent

If the whistleblower's identity has to be disclosed to parties other than those in charge of receiving and managing the report in compliance with the *whistleblowing procedure* and with the provisions of the Decree, the whistleblower will be asked to provide express and specific consent (Art. 12 D.Lgs. 24/2023 and Art. 6 of Reg (EU) 679/2016).

Consent is optional and may be freely withdrawn at any time, in the methods indicated at the time of the request, with the warning that revoking consent does not prejudice the lawfulness of processing performed prior to withdrawal of consent.

## 3. Methods of processing

The personal data is processed during the acquisition of the report through the use of the specific IT platform, as specified in the above-referred *whistleblowing procedure*.

In the subsequent stages (management of the report) the data are processed with the support of the same platform and/or with the support of other hard copy, IT or remote means.

The data acquired are in any case subject to processing, in full compliance with the law, the principles of lawfulness, correctness, transparency, no excessive processing and the protection of the confidentiality and rights of the data subject, through the necessary safety, technical and organisational measures, suited to ensuring their safety and confidentiality and preventing unauthorised users from tracing the identity of the whistleblower.

The data collected on the platform referred to in the *whistleblowing procedure* are processed using cryptographic methods. To ensure greater confidentiality of the whistleblower, it is specified that, if a report is submitted from a computer in the Company, there is a risk that the web pages visited – including those relating to the *whistleblowing* platform – may be saved in the browser history of the Company. You are therefore advised not to use a company device to submit the report.

## 4. Data retention period

Personal data relating to reports are retained for the time strictly necessary to manage the all phases of the report (acquisition and management), to adopt the consequent measures and fulfil the related legal obligations, and in any case not longer than five years following the date of notification of the outcome of the report management process.

After such term, the data will be erased or rendered anonymous.

For more information on the document retention policy, consult the above-mentioned *whistleblowing procedure*.

## 5. Categories of recipients of the personal data

According to the provisions of the *whistleblowing procedure*, any personal data contained in the report will be processed exclusively:

- by persons authorised by Alberto Sassi S.p.A. to manage them and authorised by the controller and/or identified as persons in charge of specific functions or tasks;
- by the provider of the platform and/or the report management service provider, acting in their capacity as

data processor pursuant to Art. 28 of the GDPR;

- by any external professionals (e.g. legal advisors, experts in internal audits or forensic investigation) who may be appointed, on behalf of the Controller, to manage investigations or checks relating to the reported matter, who also act in their capacity as data processors pursuant to Art. 28 of the GDPR;

- by the legal authorities;
- by any other persons identified by the laws in force concerning the reporting of crimes.

The details of these persons may be notified following a justified request, to be sent to the contact addresses given below.

## 6. Transfer of data

The data are stored on servers and archiving tools located inside the European Union.

The personal data will not be transferred to countries outside of the European Economic Area.

It is in any case understood that the Controller, where necessary, has the faculty to transfer the data also to countries outside of the European Union or the European Economic Area, recognised by the European Commission which guarantee an adequate level of protection for personal data or, otherwise, only where an adequate level of protection for personal data compared to that of the European Union is contractually guaranteed and that the exercise of the rights of data subjects is guaranteed. In this case, the Controller hereby ensures that data will be transferred outside of the EU in compliance with the applicable legal provisions, applying all the necessary and appropriate protections to such transfers.

The Controller will apply all the necessary protections to the above-referred transfers pursuant to the privacy laws in force.

## 7. Rights of the data subject

Compatibly with any existing regulatory obligations, the data subject may exercise the rights set forth in Articles 15/22 of the GDPR:

- right of access to personal data;
- right to obtain the correction or erasure of the data through access to the reporting platform;
- the right to withdraw consent, where applicable: the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal; the withdrawal of consent will make it impossible to access your profile, but you may in any case view the reports using their codes; withdrawal is in any case not envisaged if the processing is required to fulfil a regulatory obligation for which the data subject is controller;
- the right to submit complaints to the Data Protection Authority pursuant to Art. 77 of the GDPR or to the competent legal authority pursuant to Art. 79 of the GDPR, in the methods and the limits provided for by the national legislation in force (D.Lgs. 196/2003).

The data subjects are informed that the rights cannot be exercised when this may lead to an effective and concrete prejudice of the confidentiality of the identity of the whistleblower, in compliance with the provisions of the Decree.

In this case, the rights may be exercised in compliance with the applicable legal provisions.

Therefore, in order to protect the confidentiality of the whistleblower, they are invited to exercise their rights, particularly those relating to the correction or erasure of their own personal data, withdrawal of consent, etc., using the same platform indicated in the *whistleblowing procedure* to submit reports, sending a specific request via the platform.

As concerns the rights of any persons other than the whistleblower, the Controller informs that the exercise of such rights, particularly the right of access, may be delayed, limited or excluded for the whole time in which this constitutes a necessary and proportionate measure, considering the fundamental rights of the whistleblower and the compliance with the legal obligations by the Controller or the Data Processors, also to safeguard the interests of confidentiality and protection of the identity of the whistleblower and to guarantee that the investigations into the report do not risk being compromised.

## 8. Controllers and categories of data processors

The Controller is Alberto Sassi S.p.A. - VAT Reg. No.: 01994221206 - with registered office in Loc. Crespellano - Valsamoggia (BO), Via Guido Rossa 1.

You may contact the Controller, also to request the exercise of the rights of the data subject, at [privacy@sassi.it](mailto:privacy@sassi.it)

The list of categories of data processors is kept at the registered office of the Controller.

For all matters not provided for herein, please refer to the provisions of D.Lgs. 24/2023.