

## **INFORMATION PURSUANT TO ARTICLES 13 AND 14 EU REG. 2016/679 (“GDPR”)**

### **Introduction**

Pursuant to and for the purposes of Articles 13 and 14 of EU Regulation no. 2016/679 ("GDPR"), Giusto Faravelli S.p.A., in its capacity as Data Controller, hereby informs Data Subjects about the methods and purposes of the processing of their Personal Data, acquired through the Reports of Wrongdoing submitted, in paper or electronic form, as part of the Whistleblowing procedure.

The Data will be processed in full compliance with the obligations and principles of the law, ensuring the full protection of the fundamental rights and freedoms of the Data Subjects.

This policy does not apply to any information provided anonymously and not associated or associable with an identified or identifiable person.

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### **Data Controller**

Giusto Faravelli S.p.A., with registered office in Milan (MI) Via Medardo Rosso 8, Tax Code and VAT number 03224410153, whose contact details are as follows:

- Tel. +39 02 697171
- Email [faravelligroup@faravelli.it](mailto:faravelligroup@faravelli.it) – [privacy@faravelli.it](mailto:privacy@faravelli.it)

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### **Categories of Data Processed and Original Source of Data**

Personal data:

- personal data, contact details, company to which they belong, roles, particular or judicial data of the person who submits a Report as part of the Whistleblowing procedure adopted by the Data Controller, as well as any other personal data that the Whistleblower deems appropriate to communicate in order to better substantiate the report;
- personal data, company to which they belong, role, conduct and any other information relating to the Reported Person, which will be transmitted to the Data Controller as part of the Whistleblowing procedure.

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### **Purpose of data processing**

Personal data, as indicated above, are processed:

- to collect and process reports of wrongdoing, as well as to carry out investigations in compliance with the obligations deriving from Leg. Decrees 24/2023 and 231/2001;
- to exercise disciplinary power against its employees or to exercise the rights deriving from the contract in the event of wrongdoing reported pursuant to Leg. Decree 24/2023;
- for any potential exercise of the Data Controller's right of defence.

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### **Legal basis for processing and data retention period**

Purpose

Legal basis

Retention time

- | Purpose | Legal basis  | Retention time   |
|---------|--|--|
| i.      | Processing necessary:<br>- for the execution of legal obligations, as provided for by Art. 6.1.c del RGE 2016/679; | Processing will not exceed the duration necessary for the purposes for which the data were collected, in compliance with the statute of limitations or the different terms that may be established by law for their retention or, for a longer time, in the event that it is |
| ii      | - for the fulfilment of contractual obligations, pursuant to Art. 6.1.b of the RGE 2016/679;                       |  |
| lii     |  |  |

- for the pursuit of the legitimate interest of the Data Controller to defend itself in court and to guarantee communications with partners, customers, suppliers and Group Companies, after balancing the fundamental rights and freedoms of the Data Subject, pursuant to Art. 6.1.f of the GER 2016/679. necessary to keep them for the protection of the rights of the Data Controller.

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**Data processing methods**

The processing of personal data, as listed above, will be based on principles of correctness, lawfulness and transparency, protecting the confidentiality and rights of the Data Subjects and will be carried out using means (physical supports and technological tools) suitable to guarantee their security and confidentiality at all times, according to the *best practices* available.

In particular, the Data stored at the Data Controller's headquarters will not be processed with automated decision-making processes, but exclusively by personnel expressly appointed, informed and trained to do so, and will be communicated exclusively to the subjects expressly authorised to process them in order to carry out investigations in the context of the Report transmitted.

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**Consequences of failure to provide data**

The provision of data by the Data Subject is optional.

If the Whistleblower submits the report through the appropriate platform in the Whistleblowing section of the website [www.faravelligroup.com](http://www.faravelligroup.com), the Whistleblower is given the right to indicate or omit their personal data (anonymous reporting).

The refusal to provide personal data by the Whistleblower will not have any consequence on the validity of the work of the Supervisory Body.

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**Categories of entities who access the data and scope of dissemination**

The Data will be processed exclusively by the personnel expressly appointed to do so on the basis of precise instructions that guarantee full compliance with the protection and confidentiality of the Data. In particular, the Data will be processed by the Supervisory Body, which operates as an External Data Processor, pursuant to a specific agreement signed with the Data Controller.

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**Transfer of data**

The Data will not be transmitted abroad or to other bodies, except where this is necessary at the request of the Authorities.

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**Rights of the data subject**

In relation to processing purposes, Data Subjects are entitled to exercise the rights provided for by Art. 15 et seq. of the GDPR, in particular the right to:

- access, or to obtain confirmation of the existence or otherwise of personal data relating to them, to know of its origin, as well as the logic and purposes upon which processing is based, the recipients or categories of recipients to which the data may be communicated, the determination of the retention period, if it can be defined;
  - rectification of inaccurate data;
  - erasure (known as right to be forgotten), if the data are no longer necessary for processing purposes, or if the Data Subject has withdrawn consent to processing (if that consent is optional or there is no other legal basis for processing);
  - limitation, the right to obtain from the Data Controller, the restriction of access to their personal data by all entities that have a service or employment contract with the Controller. In any case, the Data Controller guarantees access to personal and judicial Data (where
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provided because they are necessary for the purposes described) to a limited number of people in order to guarantee the security, integrity and correctness of the aforementioned data;

- portability, the right to receive, in a structured, commonly-used and machine readable format, the personal data relating to you, with the possibility of sending them to another Controller. That right does not apply to non-automated processing (for example, archives or paper records); in addition, only data processed with your consent are subject to portability and only if the data have been provided by you personally;
- objection, i.e. the right to object to processing for reasons related to their particular situation;
- complaint pursuant to Art. 77 GDPR to be sent to the Guarantor for the Protection of Personal Data, email: [garante@gdpr.it](mailto:garante@gdpr.it).

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**Methods of exercising rights**

Rights may, at any time, be exercised by the Reporting Manager, by sending a registered, recorded-delivery letter to Giusto Faravelli S.p.A., with registered office in Milan at Via Medardo Rosso 8, taking care to specify "Confidential for the Reporting Manager".