

Subject: INFORMATION IN ACCORDANCE WITH ARTICLES. 13-14 GDPR CONCERNING THE PROCESSING OF PERSONAL DATA - WHISTLEBLOWING

1. Data controller

Raccagni Group S.r.l. (hereinafter also "Raccagni Group" or "the Company") in the person of its legal representative, in its capacity as Data Controller, informs you that the EU Regulation no. 2016/679 (so-called GDPR) and Legislative Decree no. 196/2003 as amended govern the protection of personal data. Raccagni Group imprints the processing of data on the principles of correctness, lawfulness, transparency and necessity, as required by the aforementioned legislation. To this end, pursuant to Articles 13-14 of the GDPR, we provide you with the following information.

2. Type of data handling

The receipt and management of reports, gives rise to the processing of c.d. "common" personal data (first name, last name, job role, any other information related to the illicit conduct, founded or presumed, as well as may give rise, depending on the content of the reports and the acts and documents attached to them, to processing of c. d. "special" (data relating to health conditions, sexual orientation or trade union membership, referred to in Art. 9 GDPR) and personal data relating to criminal convictions and offenses (referred to in Art. 10 GDPR).

3. Purpose and Legal Basis of Processing

Personal data are collected and processed for the purposes strictly related to the handling of reports of unlawful conduct in violation of national/European regulations and if adopted of the Company's Code of Ethics and the Organization, Management and Control Model.

Taking into account the relevant legislation (EU Directive No. 1937/2019 and Legislative Decree No. 24/2023), the legal basis for such processing is therefore represented:

- For the processing of common data, by Article 6.1(c) of the GDPR ("fulfillment of a legal obligation to which the data controller is subject").
- For the processing of special and judicial data, by Article 9.2. letter g) of the GDPR

4. Method of treatment

It is represented that the Data Controller undertakes to process, in a lawful, correct and transparent manner, only the data necessary for the achievement of the purposes indispensable for the performance of the activities covered by the report.

The processing is carried out by the Holder also with the help of electronic means, including automated tools, and tools suitable for receiving reports in oral form equipped with appropriate security measures (encryption of files), organizational, technical and physical, to protect the information from alteration, destruction, loss, theft or improper or illegitimate use.

The reports and the documents relating to their handling will be kept for five years from the date of the communication of the final outcome of the reporting procedure.

The identity of the reporting person and any other information from which that identity may be inferred, directly or indirectly, will be processed exclusively by persons authorised to process the data in accordance with Article 29 GDPR and will not be disclosed, to other persons, without the specific consent of the same, as required by Article 12 no. 2 of the Decree. Consent is optional and is given when reporting via the platform.

5. Data communication and transfer

Your data will not be disseminated, but will be processed by the following entities, listed by way of example but not limited to:

- public authorities in fulfilment of specific legal obligations and judicial authorities acting as autonomous data controllers
- external companies entrusted with report management services and IT service providers, which act as data processors pursuant to Article 28 GDPR subject to confidentiality obligations and only for purposes functional to the task assigned to them Organismo di Vigilanza
- Legal advisers possibly involved in the investigation phase
- Any functions that may be involved in the inquiry and investigation phase, specifically authorised for this purpose and bound to confidentiality

The list of external data processors is available at the Company's registered office.

6. Rights of the person concerned

Please note that, pursuant to Articles 15 to 22 of the GDPR, it is possible to exercise, within the limits of Article 2-undecies of the Privacy Code, the right to:

- a) access to personal data;
- b) their correction in case of inaccuracy;
- c) data cancellation;
- d) restriction of treatment;
- e) the right to data portability, i.e. to receive, in a structured, machine-readable and commonly used format, the personal data provided and to have them transferred to another data controller without hindrance;
- f) the right to object to processing, if the conditions are met.

In addition, it is possible for the person concerned to lodge a complaint with the Personal Data Protection Authority based in Piazza Venezia 11, 00187 Rome.

If you have any further questions about this policy or any privacy issues, or if you wish to exercise your rights, please contact [info@raccagnigroup.com].