

Privacy policy in accordance with Article 13 of Regulation (EU) 2016/679 On the processing of personal data of individuals who report wrongdoing ("Whistleblowing legislative decree no. 24/2023")

Pursuant to Regulation (EU) 2016/679 (hereinafter the "Regulation") and Legislative Decree no. 196/2003 (hereinafter collectively "Applicable Legislation"), this document describes the methods through which Besenzoni spa carries out through the special channel of reporting violations of wrongdoing or irregularities (Whistleblowing).

If the report comes from a person bound by an employment relationship or assimilated collaboration, this information must be understood as supplementary and not a substitute for the information given to personnel for the management of the employment relationship. Specific security measures are observed to prevent the loss of personal data, unlawful or incorrect use, and unauthorized access.

DATA CONTROLLER

The data controller is the company "Besenzoni s.p.a." with headquarters in Sarnico, Via Molere No. 2 (hereinafter also only the "holder"), which can be contacted at the following addresses:

by telephone at this number: 035-910847

by fax at this number: 035-911394

through regular or registered mail by writing to "Besenzoni spa" with headquarters in Sarnico, Via Molere n.2;

CATEGORIES OF PERSONAL DATA PROCESSED, PURPOSES AND BASIS OF PROCESSING

The receipt and handling of reports results in the processing of personal data.

The data that will be provided by you to report alleged illegal conduct of which you have become aware by reason of your employment, service or supply relationship with the Holder will be processed by the Holder to manage such situations. Personal data are, therefore, acquired as they are contained in the report and/or in acts and documents attached to it. They refer to the reporting subject and may also refer to persons indicated as possibly responsible for the illicit conduct, as well as to those in various capacities involved in the reported events. In particular, they are collected in order to carry out the necessary investigative activities aimed at verifying the basis of what has been reported, as well as, where appropriate, to take appropriate corrective measures and take appropriate disciplinary and/or judicial action against those possibly responsible for the illegal conduct.

The reception and management of reports results in the processing of so-called "common" personal data (name, surname, job role, etc.). They may result as well, depending on the content of the reports and the acts and documents attached to them, in the processing of so-called "peculiar" personal data (data relating to health conditions, sexual orientation, trade union membership, etc., and referred to in Article 9 of the Regulations) and data relating to criminal convictions and offenses (and referred to in Article 10 of the Regulations).

Taking into account the referring legislation on "whistleblowing" it is specified that:

- The processing of common data is based on the legal obligation to which the Data Controller is subject;
- The processing of peculiar data is based on the fulfillment of obligations and the exercise of specific rights of the data controller and the data subject in the field of labor law (Art. 9(2)(b) Regulation);
- The processing of data relating to criminal convictions and offenses, taking into account the provisions of Article 10 of the Regulations, is based on the legal obligation to which the Controller is subject.

In order to classify your report as whistleblowing, your identifying information (first name, last name) must be provided. In the event that the whistleblower wishes, however, to proceed with an anonymous report, the latter will be taken into consideration only if it is adequately circumstantiated, made with a sufficient amount of detail and, therefore, capable of bringing to light facts and situations relatable to specific contexts. It is left, on the other hand, to each reporter to decide what further personal data to confer. The more details in the report, the greater will be the Holder's possibilities to intervene.

It should be noted that, should the report lead to the establishment of disciplinary proceedings against the person responsible for the misconduct, the identity of the reporter will never be disclosed. Should knowledge of the reporter's identity be indispensable for the defense of the accused, the reporter will be asked if he/she wishes to give appropriate, free consent for the purpose of revealing his/her identity.

For his or her protection, only the Whistleblowing Reporting Manager is able to associate reports with the identities of whistleblowers.

Should investigative needs require that other subjects should be made aware of the content of the report or of the documentation attached to it, the identity of the reporter will never be revealed, nor will elements that could, even indirectly, allow the identification of the same. These subjects, since they could, in any case, become aware of other personal data, are, however, all formally authorized to the processing and specially instructed and trained for this, as well as required to maintain the secrecy of what they learned by reason of their duties, without prejudice to the reporting and denunciation obligations referred to in Article 331 of the Code of Criminal Procedure.

MODES OF PROCESSING AND CONSERVATION

Personal data will also be processed by automated means for the time strictly necessary to achieve the purposes for which they were collected. The Data Controller implements appropriate measures to ensure that the data provided are processed appropriately and in accordance with the purposes for which they are handled, employing appropriate security, organizational, technical and physical measures to protect the information from alteration, destruction, loss, theft or improper or illegitimate use.

The Data Controller, also through the persons authorized for processing, periodically checks that:

- the technical and organizational security measures relating to the instruments through which your data are processed are effective, in good order and constantly updated;
- Your data are not collected, processed, stored or retained beyond what is necessary;
- your data are kept with adequate guarantees of integrity and authenticity and of their use for the purposes of the treatments effectively performed;
- your data are kept for the time necessary for the completion of the activities related to the management of the

report you made and, in particular, no longer than the time predetermined in advance.

The Whistleblowing Reporting Manager will carry out a preliminary investigation of the report. If, as a result of the activity carried out, it finds elements of manifest groundlessness, it will order its dismissal. On the other hand, if it finds that the report is well-founded, it will forward it, without the data of the reporter, to the internal or external bodies in charge, each according to its competences. Personal data will be kept for a period of 5 years and, in any case, until the settlement of the proceedings initiated on account of the report. This does not preclude retention for a longer period in connection with requests by public authorities and the Supervisory Authority for the Protection of Personal Data, as well as for needs related to the exercise of the right of defense in case of disputes.

SUBJECTS OF THE PERSONAL DATA COMMUNICATION

The communication of the collected personal data is mainly to third parties and/or recipients whose activity is necessary for the performance of activities related to the management of the report, as well as to respond to certain legal obligations.

Specifically, the transmission (without your identifying information) may be made to:

- (a) Whistleblowing manager identified by the Holder;
- b) company appointed for the management of the platform, in its capacity as External Manager pursuant to and for the purposes of Article 28 GDPR;
- c) external consultants (e.g. law firms) possibly involved in the preliminary phase of the report;
- (d) corporate functions involved in the activity of receiving, reviewing and evaluating reports;
- (e) head(s) of the function(s) affected by the report;
- f) organizational positions in charge of conducting investigations on the report in cases where their knowledge is indispensable for understanding the reported facts and/or for conducting the related instruction and/or processing activities;
- g) institutions and/or Public Authorities, Judicial Authority, Police Bodies, Investigative Agencies;
- (h) supervisory body.

Your personal data will in no way be spread or disclosed to parties other than those identified above. The owner's computerized platform is located on Swiss territory. For the purposes of the safeguards due under Article 45 of the GDPR, the Commission by DECISION of July 26, 2000 concerning the adequacy of the protection of personal data in Switzerland pursuant to Directive 95/46/EC declared that Switzerland offers an adequate level of protection for personal data transferred from the European Union. Therefore, no further authorization appears necessary for this activity.

What are your rights?

You, as a concerned person, have the following rights:

- to **access**, i.e. to obtain confirmation as to whether or not personal data about you are being processed and, if so, to obtain access to such data, including a copy of them;
- to **rectification**, i.e. to obtain without undue delay the rectification of inaccurate personal data concerning yourself and/or the supplementation of incomplete personal data;

to **erasure** (right to be forgotten), i.e. to obtain without undue delay the deletion of personal data concerning you;

to **limitation of processing**, i.e. to obtain the limitation of processing, in the cases referred to in Article 18 of the Regulation;

to **data portability**, i.e. to receive from the Data Controller, in a structured, commonly used and machine-readable format, the personal data concerning him/her and the right to have them transmitted to another Data Controller without hindrance, if the processing is based on consent and is carried out by automated means, as well as to have them transmitted directly to another Data Controller if this is technically feasible;

of **objection**, i.e., the right to object at any time on grounds relating to your particular situation, to the processing of personal data concerning you based on the lawful condition of legitimate interest or the performance of a task carried out in the public interest or in the exercise of official authority, including profiling, unless there are legitimate grounds for the Controller to continue the processing that override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of a legal claim. In addition, the right to object at any time to processing if personal data are processed for direct marketing purposes, including profiling, when it is related to such direct marketing;

of **revocation**, that is, to revoke one's consent at any time. Withdrawal of consent does not prejudice the lawfulness of processing based on consent prior to revocation;

to **complain** or to lodge a complaint with the Italian Data Protection Authority, Piazza di Montecitorio 121, 00186, Rome (RM).

Pursuant to Article 2-undecies of the Privacy Code (implementing Article 23 of the GDPR), please note that the aforementioned rights may not be exercised by data subjects (by request to the Data Controller or by complaint under Article 77 of the GDPR) if actual and concrete prejudice to the confidentiality of the identity of the reporter may result from the exercise of such rights.