

MANAGEMENT OF REPORTS (so-called "Whistleblowing")

INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR THE WHISTLEBLOWER

Pursuant to Art. 14 EU Reg. 2016/679 (GDPR)

As part of the process of managing reports of violations, pursuant to Legislative Decree 10 March 2023, n. 24 on "Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 concerning the protection of persons reporting breaches of Union law and containing provisions concerning the protection of persons reporting breaches of the provisions national regulations" (hereinafter "**Report**"), the Data Controller processes your personal data as the person mentioned in the Report, as the person to whom the Report is attributed or as a person in any case implicated (hereinafter also "**Person Involved**").

Below, the Data Controller provides you with information relating to the said processing of personal data, pursuant to art. 13 EU Reg. 2016/679 (hereinafter "**GDPR**").

1. Data Controller

The data Controller is **Nemo Industrie S.p.A.**, with headquarters in via P. Togliatti, 1555, 47025 Cella di Mercato Saraceno (FC), in the person of its legal representative pro tempore and can be contacted at the following addresses: e-mail nemo@nemoindustrie.com, postal mail at via P. Togliatti, 1555, 47025 Cella di Mercato Saraceno (FC).

2. Data processed

As part of the management of the Reports, the Data Controller may process the personal data of the Reporter and in particular,

- Personal data relating to the Reporter (except in the case of anonymous reports) such as, by way of example and not limited to, name, surname, e-mail address, telephone number, residence and domicile address, voice and image of the Reporter;
- Personal data contained in the Report and the elements collected in the related verification; in this regard, the Data Controller may also process particular categories of Data (i.e. Data suitable for revealing racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade union nature, as well as Personal Data suitable for revealing the state of health and sexual life, pursuant to art. 9 GDPR) and so-called Data. "judicial" (i.e. Data relating to criminal convictions and crimes, pursuant to art. 10 GDPR).

We invite you to provide only the data necessary to manage the Report.

In compliance with the principle of minimization, personal data that is manifestly not useful for the management of the Report are not collected or are immediately deleted.

3. Source of data

Your data is initially collected through a specific channel, as part of the management of a Report pursuant to the so-called "whistleblowing" legislation as an Involved Person. Following this, they may be collected through a specific investigation by the Owner.

4. Purpose of the processing

Personal data will be processed for the sole purpose of receiving, analyzing and managing the Report, ascertaining the facts that form the subject and adopting the consequent measures.

In the event that the Report is deemed to be well founded, its content and related data will be used by the Data Controller in order to continue investigation activities to ascertain the facts.

5. Legal basis of the processing

The legal basis of the processing for the purposes indicated above is the fulfillment of the provisions of the Legislative Decree of 10 March 2023, n. 24 and subsequent amendments and additions, pursuant to art. 6 par. 1 letter c) GDPR.

6. Treatment methods and storage times

The Data Controller processes the data in compliance with the principles of lawfulness, transparency, correctness, necessity, relevance and non-excess with respect to the purposes pursued and adopts security, technical and organizational measures, adequate to guarantee the integrity, availability and confidentiality of the data. The processing may also take place by means of electronic IT media.

The Report and the data connected to it will be kept for the time necessary to manage and process the Report itself, in any case no later than five years from the date of communication of the final outcome of the Report procedure. After this deadline, the data will be destroyed or anonymized, using techniques that prevent the data subject from being identified.

7. Automated decision making

The Data Controller does not adopt any automated or algorithmic decision-making process, including profiling, referred to in Article 22, paragraphs 1 and 4, of the GDPR.

8. Data confidentiality and categories of recipients

The data may be stored outside the European Union and in this case the Data Controller prefers countries that have been subject to an adequacy decision or in any case ensures the adoption of adequate guarantees, including standard contractual data protection clauses.

Under no circumstances will your data be disclosed, but may be shared as necessary with the following subjects:

- reports manager, person responsible for receiving and managing reports, appointed pursuant to art. 4 paragraph 2 of Legislative Decree 24/2023,
- subjects competent to follow up on the Reports,
- subject who, in his capacity as data controller pursuant to art. 28 GDPR, provides the application used by the Data Controller for the management of Reports and stores the Report and the attached documentation,
- any legal consultants who assist the Data Controller in managing the Report and its consequences,
- subjects, bodies, authorities to whom it is mandatory to communicate your personal data pursuant to legal provisions or orders of the Authorities.

9. Rights of the interested party

Pursuant to articles 15 and following GDPR, you may at any time

- a) ask the Data Controller to confirm the existence or otherwise of their personal data and access to them;

b) obtain information regarding the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be communicated and, when possible, the retention period;

c) obtain the rectification and deletion of the data, as well as, where technically possible, the portability of the data, i.e. receive them from a data controller, in a structured format, commonly used and readable by an automatic device, and transmit them to another data controller without impediments;

d) obtain the limitation of the processing and oppose the processing at any time, specifying the reasons connected to the specific situation that justifies such opposition pursuant to art. 21 GDPR;

e) revoke any consent at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation;

f) lodge a complaint with a supervisory authority, which in Italy is the Guarantor Authority for the protection of personal data (to the email address garante@gpdp.it, to the fax number 06.696773785 or by post to the address piazza Venezia n 11 – 00187 Rome).

These rights cannot be exercised if the exercise of such rights could result in actual and concrete harm

- carrying out defensive investigations or exercising a right in court,
- the confidentiality of the identity of the person making a Report pursuant to Legislative Decree 24/2023.

You may exercise these rights by requesting the Data Controller at the following addresses:

e-mail: nemo@nemoindustrie.com

paper mail: via P. Togliatti, 1555, 47025 Cella di Mercato Saraceno (FC)

Last update: December 2023