

STATEMENT ON PROCESSING OF PERSONAL DATA FOR PERSONS WHO REPORT WRONGDOING

(Article 13 Reg (EU) 2016/679 — GDPR)

Controller

The Controller is Arneg S.p.A. - Via Venezia, 58 - 35010 Campo San Martino (PD)

Tel.: +39 049 9699333

email: privacy@arneg.it

Personal data processed, purposes of and legal basis for processing

The Controller will process personal data that you provide when reporting alleged wrongdoing of which you may have become directly aware in the context of your work and relating to:

- administrative, accounting, civil or criminal wrongdoing;
- breaches of Union law across a very wide range of areas mentioned expressly in the Annex to Directive (EU) 2019/1937 (including: public procurement, financial services, product and transport safety, environment, food, public health, privacy, network security, competition).

Such wrongdoing must be committed by persons who interact in whatever capacity with the Controller.

Processing of the data in question is required in order to fulfil the legal obligations imposed on the Data Controller by Legislative Decree n° 24 of 2023 (article 6, para 1, letter (c) of GDPR) and with regard to conducting the necessary investigative activities aimed at verifying the facts of the matter reported and the adoption of the consequent measures. The Data Controller also recognises and accepts 'anonymous' reports, and accordingly, any processing of your identification and contact data is subject to your consent.

In any event, you remain personally liable for any defamatory content that may be present in your communications. In addition, the Controller cautions that data provided by the whistleblower must be pertinent to the purposes of the report (further guidance can be obtained by reading the procedure adopted for reports).

Methods of processing

Data is processed via computerised procedures, or manually, by a Whistleblowing Officer who is specifically trained and authorised by the Data Controller and moreover bound by duties of confidentiality and data management in accordance with such security measures as are deemed appropriate.

Obligation to provide data

The communication of personal data relating to the subject of the report is optional. In the event of a refusal, and the communication of such data should then prove indispensable in enabling proper contextualisation of the incident and/or checking that the requirements for making the report are being met, the Controller may elect not to consider the report.

The personal identification and contact data of the whistleblower (apart from the e-mail address, communication of which is mandatory when submitting a report) can be withheld, without prejudice to the valid submission of the report.

For security reasons relating to the confidentiality of your personal data and to avoid possible harmful consequences, the Controller does not receive reports other than through the dedicated channel.

Recipients of personal data

The data collected will not be disseminated. If necessary for the fulfilment of the purpose described above, data collected and processed by the Whistleblowing Officer may be passed on to other staff appointed by the Data Controller. In addition, where appropriate, data collected in connection with a report will be forwarded to the competent authorities.

Retention of personal data

Reports and the documentation of their investigation are kept for as long as is necessary for the report to be processed and in any event no longer than five years from the date on which the final outcome of the verification procedure is communicated, in accordance with confidentiality obligations.

If the report has importance for the purposes of legal proceedings, it will be retained for as long as may be necessary to enable the exercising of rights through the law courts.

Rights of data subjects

As a data subject, you are entitled to exercise the following rights:

- to access your personal data and obtain information concerning the purpose of processing, the category of personal data, the recipients to whom your data have been or will be disclosed, the period for which the data will be stored, the origin of the data if not provided directly by the Data Subject, the existence of any automatic profiling system (GDPR article 15);
- to rectify data communicated previously (GDPR article 16);
- to restrict the processing of the aforementioned data (GDPR article 18).

The right to erasure under GDPR article 17 is not exercisable by reason of the provision indicated in the selfsame article under paragraph 3, letter (b).

To exercise their rights, Data Subjects must submit a request to the Controller, using the contacts indicated at the top of this statement.

Should Data Subjects consider that the processing of their data is in breach of Regulation (EU) 2016/679 — GDPR — they are entitled to lodge a complaint with the Data Protection Authority via the contacts available on the website <https://www.garanteprivacy.it/>.