



Privacy notice on the processing of personal data in the context of Whistleblowing pursuant to Articles 13 and 14 of the GDPR

Pursuant to current legislation on the protection of personal data (the "**Privacy Policy**") including Regulation (EU) 2016/679 (the "**GDPR**") and Legislative Decree 196/2003 as amended by Legislative Decree 101/2018 ("**Privacy Code**") and pursuant to Legislative Decree 24/2023 ("**Whistleblowing Decree**"), **Reno de Medici S.p.A. as Data Controller (Company**" or "**Owner**"), as well as all subsidiaries of the RDM Group, as joint data controllers (the "**Joint Controllers**"), inform all employees of the RDM Group, collaborators, partners, consultants, customers, suppliers and, more generally, anyone who is in a relationship of interest with the RDM Group – as well as all persons involved in the scope of the Reporting (such as *infra* defined) – (the "**Data Subjects** or, in the singular, the "**Data Subject**") that it will process their personal data collected in the context of the management of any reports of breaches (the "**Reports**") made by the Data Subjects, as notifying parties ("**Reporting agents**" or "**Reporters**"), through the reporting channels made available by the Company, in strict compliance with the Whistleblowing Decree and the Privacy Legislation, for the purposes and in the manner described in this information sheet (the "**Privacy Notice**").

1. What channels can be used?

This Privacy Notice concerns the processing of personal data collected as part of the management of Reports made through the following internal channels:

- a. the One Trust electronic reporting channel ("*Whistleblowing Module*") accessible by icon on the company intranet and/or by link found on the company website <https://rdmgroup.com/it/> (the "**Platform**");
- b. by ordinary post to: Reno De Medici S.p.A, f.a.o. Supervisory Board, Viale Isonzo 25, 20135 Milan;
- c. by email to: organismodivigilanza@rdmgroup.com ;
- d. at the Reporter's request, by means of a direct meeting within a reasonable period.

Reports may be of 3 types:

1. Open, meaning when Whistleblower openly raises a problem without any limits related to his/her confidentiality;
2. Confidential, when the Reporter's name is known only to the persons responsible for managing Reports, but the Company treats the Report confidentially without revealing the identity of the Reporter or without his or her express consent;
3. Anonymous, when the details of the Reporter are not explicit or otherwise identifiable.

For more information, please refer to the Procedure adopted by the Company and available on the Company intranet and on the Company's website.

2. WHO IS THE DATA CONTROLLER?

The Data Controller is **Reno de Medici S.p.A.**, with registered office at Viale Isonzo 25, 20135, Milan, VAT No. 00883670150, contact number 02 89966 111 or at the following email address: RDM-GDPR@rdmgroup.com.

The Company's Data Protection Officer is the Data Protection Officer ("**DPO**"), domiciled at the headquarters at Viale Isonzo 25, Milan, which can be contacted at the following email address: dataprotectionofficer@rdmgroup.com.

The Data Controller is the *holding company* of the RDM Group (the "**RDM Group**"). The subsidiaries of the RDM Group, the list of which is available on the company website, operate as Joint Data Controllers.

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Tel.: +39 02 89966 111 - Fax: +39 02 89966 200 / Certified e-mail: renodemedici@pec.rdmgroup.com / www.rdmgroup.com
Share Capital € 140,000,000.00 fully paid-up / Economic Administrative Index no. MI-153186 / Tax Code, VAT number and number of Registration at the Companies' Register of Milan 00883670150



3. WHAT PERSONAL DATA DO WE COLLECT?

The Data Controller, by reason of the type of Report (open, confidential or anonymous) and in the context of its management, processes the following personal data provided by the Data Subjects:

Common data	<p>If the Data Subject makes an open or confidential report, and therefore does not opt for anonymous reporting, the Data Controller (and the Joint Controller for reports within its purview) processes the following data:</p> <ul style="list-style-type: none">• identification and contact details of the Data Subject, including but not limited to: name, address or other personal identification details; personal and/or company telephone and email contact details;• data relating to the employment and/or contractual relationship with the Company and/or other RDM Group companies, such as, by way of example but not limited to: professional title, function held, information relating to professional activity;• further data and information characterising the content of the Report;• if the Report takes place through a fixed direct meeting and the Data Subject, as required by the Whistleblowing Decree, <u>has given his or her consent</u> to the recording, the voice of the Data Subject, it being understood that the Company shall inform the Data Subject that no specific technical device will be used which allows for the unambiguous identification or authentication of the Data Subject;• where appropriate, personal data of other whistleblowers involved in the Report, including facilitators;
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The Data Controller, as well as any Joint Controller, does not collect data that is manifestly not useful for the processing of a specific Report and, if collected accidentally, will be deleted immediately.

Without prejudice to compliance with the rules and principles on the protection of personal data provided for by the Privacy Legislation and the confidentiality obligations established in the Whistleblowing Decree by the Data Controller, as well as by each Joint Controller, the personal data indicated above:

- i. may be supplemented and/or updated on the basis of additional information collected or already available to the Data Controller, the Joint Controller and/or directly provided by the Data Subject, including in order to verify the validity of the Report;
- ii. may include additional types of personal data (including, where appropriate: **Special Categories of Personal Data** pursuant to Article 9 of the GDPR and **Personal data relating to criminal convictions and offences** pursuant to Article 10 of the GDPR) freely provided by the Data Subject in the context of the Report, which may constitute elements characteristic of the content of the Report itself, and refer to persons indicated as possible liable for the unlawful conduct, as well as to those involved in the reported events in various ways;
- iii. They may also be processed in the case of an Anonymous Report only if the Data Subject decides, after the time of the first Report, not to remain anonymous.

The Data Controller shall inform Data Subjects that the identity of the Whistleblower and any other information from which such identity may emerge, directly or indirectly, shall not be revealed **without the prior express consent** of the Whistleblower by the Data Controller and/or other RDM Group companies to persons other than those competent to receive and follow up the Reports, expressly authorised to process such data pursuant to Article 29 of the GDPR and 2-*quaterdecies* of the Privacy Code, and in any case in accordance with the provisions of the Whistleblowing Decree.

4. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS DOES THAT PROCESSING TAKE PLACE?

The Data Controller shall inform the Data Subjects that the personal data acquired by the Company as part of the collection and management of the Report will be processed electronically and physically for the following purposes (the "**Purposes**"):

Purpose of processing	Legal basis of processing	Nature of personal data provision
a) Collection, documentation and management, in a confidential manner, according to the methods permitted by law and guaranteeing the protection of the Reporting agent, of Reports relating to conduct, acts or omissions consumed or attempted, by persons who in various capacities interact with the Data Controller, to the detriment of the integrity of the company organisation for the performance of the necessary investigative activities aimed at verifying the validity of the fact subject to Report and the adoption of the consequent measures.	Article 6(1)(c) of the GDPR: legal obligation to which the Data Controller is subject pursuant to the Whistleblowing Decree	The provision of personal data is optional, as the data subject has the right to report anonymously.
b) Establishment, exercise or defence of a right in court.	Article 6, paragraph 1, letter f) of the GDPR: legitimate interest of the Data Controller relating to the right to defend and exercise its rights or that of a third party.	
c) although the Data Controller does not require the Data Subject to provide Special Categories of Data, if this data is contained in the Report and it is inevitable and necessary to process it, processing will take place solely for the purposes of managing the Reports and the necessary investigative and verification activities and for the purposes of establishing, exercising or defending a right in court.	Article 9, paragraph 2, letter b) of the GDPR: legal obligation to which the Data Controller is subject; and Article 9, paragraph 2, letter f) of the GDPR: establishing, exercising or defending a right in judicial proceedings.	
d) although the Data Controller does not require the Data Subject to provide Personal Data relating to criminal convictions and offences, if this data is contained in the Report and it is inevitable and necessary to process it, processing will take place solely for the purposes of managing the Reports and the necessary investigative and verification activities and for the purposes of ascertaining, exercising or defending a right in court.	Article 10 of the GDPR: legal obligation to which the Data Controller is subject.	

It is clarified that the Data Controller will process data for the collection and management of Reports relating to the entire RDM Group, coordinating from time to time with the subsidiaries concerned; the individual subsidiaries, as Joint Data Controllers, will process data acquired in the context of the management of Reports for the purposes referred to in the previous point, but exclusively in the context of Reports relating to its subsidiary.



If the legal basis for the processing is the legitimate interest of the Data Controller, it warrants that it has previously carried out a ("balancing test") to ensure the proportionality of the processing so that the rights and freedoms of the Data Subjects are not affected, taking into account their reasonable expectations in relation to the specific processing activity carried out.

Data Subjects may request further information on the above assessment by sending an email to the following address: dataprotectionofficer@rdmgroup.com.

Finally, it should be noted that the Data Controller and the Joint Data Controllers have signed a joint agreement, which I will be made available to interested parties following a request sent to the following address: dataprotectionofficer@rdmgroup.com.

The Data Controller also informs the Data Subjects that they have the opportunity to **object** to the processing of their personal data based on the Company's legitimate interest.

5. HOW DO WE PROCESS YOUR PERSONAL DATA?

In relation to the above Purposes, the processing of personal data may consist in the activities indicated by Article 4, paragraph 1, no. 2) of the GDPR, i.e.: collection, recording, organisation, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, interconnection, cancellation and destruction of personal data.

The personal data of the Data Subjects will also be:

- processed in accordance with the principles of lawfulness, propriety and transparency;
- collected for the legitimate Purposes determined above;
- adequate, relevant and limited to what is necessary in relation to the Purposes for which they are processed;
- stored in a form that allows the identification of the Data Subject for a period not exceeding the achievement of the Purposes, as defined in greater detail in point 7 below;
- treated in such a way as to ensure adequate security against the risk of destruction, loss, modification, unauthorised disclosure or access through technical and organisational security measures.

Processing may be carried out by manual, electronic and telematic means that are strictly related to the Purposes themselves and, in any case, by methods that guarantee the security and confidentiality of the data, in addition to compliance with the specific obligations established by the Privacy Legislation applicable from time to time.

6. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

The personal data of the Data Subjects will be processed by employees and collaborators of the Company and/or subsidiaries of the RDM Group, specifically designated as persons authorised to process data pursuant to Article 29 of the GDPR and 2-*quaterdecies* of the Privacy Code, where necessary to pursue the Purposes referred to in point 3 above of this Privacy Notice.

In addition, the Data Controller informs the Employees that their personal data may be communicated for the pursuit of the Purposes to additional recipients or categories of recipients, as autonomous data controllers or, where necessary, data processors specifically selected and appointed pursuant to Article 28 of the GDPR, including but not limited to:

- a) the company that provides the Platform and/or the relevant maintenance services
- b) competent authorities and public bodies, for the performance of institutional functions, within the limits established by law and regulations;
- c) consultants and independent professionals in single or associated form (in particular, lawyers);

7. TRANSFER PERSONAL DATA TO NON-EU COUNTRIES?

The personal data of Data Subjects will not be subject to transfers to third countries outside the EU. Any transfer of the personal data of Data Subjects to non-EU countries may take place only under the terms and with the guarantees provided by the Privacy Legislation and, in particular, pursuant to Articles 44 – 49 of the GDPR. In any case, if there is a transfer of personal data to countries outside the EU, the Data Controller, also on behalf of the Join Controllers, will promptly inform the Data Subjects.

8. HOW LONG DO WE KEEP PERSONAL DATA?

The personal data of the Data Subjects will be stored and processed:

- for the time necessary to process the Report and, in any case, **no later than five years** from the date of notification of the

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final outcome of the Report request;

- in the event of any litigation, for the entire duration of the litigation, until the time limits for the admissibility of the appeal proceedings are exhausted.

In any case, the personal data of the Data Subjects will be stored and processed only for as long as necessary to pursue the Purposes for which they were collected, complying with the principle of minimisation as per Article 5, paragraph 1, letter c) of the GDPR.

At the end of the aforementioned retention periods, the personal data of the Data Subjects will be deleted unless there are further legitimate interests of the Data Controller (and/or Joint-Controller) and/or legal obligations which make it necessary, after minimisation, to preserve them.

9. WHAT ARE YOUR RIGHTS IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA, HOW CAN YOU EXERCISE THEM AND HOW CAN YOU CONTACT US?

The Data Controller informs the Data Subject that, according to law, he or she will always have the right to withdraw his or her consent at any time, where given, and to exercise, at any time, the following rights (collectively, the **"Rights"**):

- a) the **"right of access"** and in particular obtain confirmation of the existence or otherwise of personal data concerning him or her and its communication in an intelligible form;
- b) the **"right to rectification"**, i.e. the right to request rectification or, if interested, to supplement personal data;
- c) the **"right to erasure"**, i.e. the right to request that data processed in violation of the law be erased, transformed into anonymous form, including data that does not need to be stored in relation to the Purposes for which the personal data were collected or subsequently processed;
- d) **"right to restriction of processing"** i.e. the right to obtain from the Data Controller and/or the Joint Controller restriction of processing in some cases provided for in the Privacy Legislation;
- e) the right to request from the Data Controller and/or Joint Controller an indication of the recipients to whom it has notified any corrections or cancellations or limitations on processing (made pursuant to Articles 16, 17 and 18 of the GDPR, in fulfilment of the notification obligation, except in cases where this proves impossible or involves a disproportionate effort);
- f) **"right to data portability"**, i.e. the right to receive (or directly transmit to another Data Controller and/or Joint Data Controller) personal data in a structured, commonly used and machine-readable format;
- g) **"right to object"** i.e. the right to object, in whole or in part:
 - to the processing of personal data carried out by the Data Controller and/or the Joint-Controller for its own legitimate interest;
 - to the processing of personal data by the Data Controller and/or Joint Data Controller for *marketing* or profiling purposes.

The Data Controller, also on behalf of the Joint Controllers, informs you that, in the context of the management of the Report, the Rights may be exercised taking into account the limits established in Article 2-undecies of the Privacy Code, in particular if (*inter alia*) the exercise of such rights may effectively prejudice the confidentiality of the identity of the person who reports violations of which he/she becomes aware due to his/her employment relationship or the functions performed.

In the above cases, where necessary, the Data Controller and/or Joint Controller shall inform third parties to whom the personal data of the Data Subject are communicated of any exercise of rights, with the exception of specific cases where this is not possible or is too costly and, in any case, in accordance with the Privacy Legislation. It is expressly understood, as provided for in Article 21 of the GDPR, that in the event of exercise of the right of objection by the Data Subject, the Data Controller and/or the Joint Controller shall refrain from further processing the personal data unless it demonstrates the existence of compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the Data Subject or to establish, exercise or defend a right in court.

The Data Subject may at any time exercise his/her Rights as follows:

- by email to: RDM-GDPR@rdmgroup.com or dataprotectionofficer@rdmgroup.com
- by ordinary post, to the address of the registered office of the Data Controller indicated on the title page.

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In any case, the Company – where there are reasonable doubts about the identity of the Data Subject submitting the request referred to in Articles 15 to 21 of the GDPR – may request additional information necessary to confirm the identity of the Data Subject.

Please note that the Company undertakes to respond to your requests within one month of receipt of the request. This period may be extended depending on the complexity or number of requests and the Company will explain the reason for an extension within one month of your request. It should also be noted that if the Data Controller and/or the Joint Controller does not comply with the request, it is required to respond to the Data Subject as to the reasons for the non-compliance and the possibility of lodging a complaint with a supervisory or judicial review authority within one month of receipt of the request.

10. HOW CAN YOU LODGE A COMPLAINT WITH THE DATA PROTECTION AUTHORITY?

The Data Controller shall inform the Data Subject that, pursuant to the Privacy Legislation, he/she has the right to lodge a complaint with the competent Supervisory Authority (in particular in the Member State of his/her habitual residence, place of work or place of the alleged breach), if he/she is of the opinion that his/her personal data are processed in such a way as to lead to breaches of the GDPR.

In order to facilitate the exercise of the right to lodge a complaint, the name and contact details of the European Union Supervisory Authorities are available at the following link: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

Finally, if the Data Subject intends to lodge a complaint with the Supervisory Authority competent for Italy (i.e. Autorità Garante per la protezione dei dati personali) the complaint form is available at the following link: <https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>.

11. CHANGES TO THE PRIVACY POLICY

This Notice may be amended and supplemented from time to time. We encourage Data Subjects to check the content periodically. In any event, the Data Controller will be responsible for appropriately reporting any significant changes to this Policy.

Document updated as of 01.07.2023