

INFORMATION ON PROCESSING OF PERSONAL DATA

compliant to art. 13 of EU Regulation 2016/679 (GDPR)

OF THE SUBJECTS WHO REPORT WRONGDOING (“WHISTLEBLOWING”)

This information is provided by Pollution S.r.l. (hereinafter, the “**Company**”) with reference to the processing of personal data carried out by the same Company in relation to the use, by the data subject, of the internal reporting channel of violations of offences or irregularities provided for by Legislative Decree no. 24/2023 (“**Whistleblowing channel**”).

If the report comes from a person linked to an employment relationship or collaboration with the Company, this information should be understood as supplementing and not replacing the information provided to staff for the management of the working relationship.

A. DATA CONTROLLER

The **Data Controller** of Your personal data is the undersigned Company, in the person of its *pro-tempore legal representative*, with registered office in Budrio (BO), Via Guizzardi 52, Tax Code 04051900373 and VAT number 00694631201 (hereinafter also the “**Data Controller**”), who can always be contacted at the company addresses.

The Company has identified an external professional for the management of the report, as well as an external service company, which offers adequate guarantees based on the provisions of Article 28 of the GDPR, as **Data Processor** for the management (collection and storage) of communications containing reports sent through the online portal.

1. DATA PROTECTION OFFICER

The Company has not appointed a Data Protection Officer (RPD/DPO).

B. PURPOSE OF THE PROCESSING

The personal data you provide as a whistleblower will be processed by the Company exclusively by personnel specifically identified, trained, instructed in confidentiality, and authorized to process it, considering their specific professional competencies, for the following purposes:

- correct and complete management of the reporting process through the Whistleblowing channel, in accordance with current legislation on the subject;
- carrying out the necessary investigative activities aimed at verifying the validity of the reported fact and the adoption of the consequent measures;
- protection of a legal right of the Data Controller;
- response to a request from the Judicial Authority or other equivalent Authority.

C. CATEGORIES OF PROCESSED DATA

The Data Controller collects and/or receives the information provided by the whistleblower through the (internal) Whistleblowing channel set up for this purpose, in accordance with the indications of Legislative



Decree no. 24/2023, as better described in the Whistleblowing Procedure adopted by the Company and advertised through the website.

The categories of personal data processed by the Company with reference to the reporting person's communication may be as follows:

- identifying and contact details of the whistleblower;
- (if any) data relating to the employment relationship between the whistleblower and the Company;
- personal and identification data of the reported person, facilitator and/or third parties, contained in the report.

The processing of the aforementioned data is based on the principles of correctness, lawfulness, transparency and protection of your most scrupulous confidentiality and rights, as set out in Legislative Decree no. 24/2023.

D. LEGAL BASIS OF THE PROCESSING

The legal basis that legitimizes the processing of Your personal data is the execution of legal obligations, as specifically indicated and described by D.lgs. n. 24/2023.

With particular reference to the processing of any so-called sensitive/special data communicated by the whistleblower, the legal basis legitimizing the processing is the one provided for under Article 9, paragraph 2, letter b) of the GDPR, namely when the processing is necessary to fulfill the obligations and to exercise the specific rights of the Data Controller or the data subject in the field of labor law, social security, and social protection (specifically, the provisions on whistleblowing set out in Legislative Decree 24/2023).

1. MANDATORY OR OPTIONAL NATURE OF THE PROVISION OF DATA AND CONSEQUENCES OF ANY REFUSAL TO PROVIDE PERSONAL DATA

The provision of the whistleblower's personal data is mandatory in the so-called "nominative report".

Any refusal to provide data in the "nominative report" will make it impossible for the Data Controller to follow up on the report You have made.

The provision of the whistleblower's data is optional in the "anonymous report".

E. METHODS OF DATA PROCESSING

The processing of your personal data may be carried out both on paper and through IT tools, using electronic or telematic means, in compliance with current regulations, including the adoption of appropriate security measures to prevent the risk of loss, destruction, or unauthorized access to the data.

F. COMMUNICATION AND DISTRIBUTION

Your personal data may be communicated, within the limits strictly pertinent to the obligations, tasks and purposes referred to above, to the following categories of subjects:

1. reporting manager identified by the Data Controller;
2. external consultants (e.g. law firms) possibly involved in the investigation phase of the report;
3. corporate functions involved in the reception, examination and evaluation of reports;
4. responsible for the function(s) concerned by the report;
5. organizational positions tasked with conducting investigations into the report in cases where their knowledge is essential for understanding the reported facts and/or for carrying out the related assessment and/or handling activities, without disclosing the identity of the whistleblower;



6. Public institutions and/or Authorities, Judicial Authorities, Police Bodies, Investigative agencies.

Your personal data will not be disseminated or disclosed in any way to subjects other than those identified above.

The processing of your data is carried out through paper documentation and/or by means of digital tools made available to individuals acting under the authority of the Data Controller, who are duly authorized and trained for this purpose. The latter are allowed to access to your personal data in so far as it is necessary for the performance of investigative activities for the processing of the report.

G. CONFIDENTIALITY

In accordance with the minimization principle of GDPR, all personal data (of any natural person) contained in the report or otherwise collected during the investigation that were not necessary will be immediately deleted or anonymized.

All Company personnel involved, in any capacity, in handling your report are required to ensure confidentiality regarding the existence and content of the report, as well as the identity of both the whistleblower and the reported individuals, including towards colleagues and hierarchical superiors.

If the complaint on the report is well-founded, in whole or in part, and knowledge of the identity of the whistleblower is essential for the defense of the accused, the report will be usable for the purposes of disciplinary proceedings only in the presence of the express consent of the reporting person to the disclosure of his or her identity. The whistleblower will be notified in writing of the reasons for the disclosure of confidential data, in accordance with the provisions of the law.

In compliance with the Law, the Company prohibits and sanctions any form of retaliation or discrimination against anyone who has made a report (as well as anyone who has collaborated in ascertaining the reported facts), regardless of whether the report has turned out to be well-founded or not.

The Company also undertakes to protect the reported individual, who will not be subject to disciplinary sanctions in the absence of objective evidence regarding the reported violation or without an investigation into the reported facts and the formal contestation of the relevant charges in accordance with legal and/or contractual procedures. The reported individual may not request to know the identity of the whistleblower, except in cases expressly provided for by Law.

H. DATA TRANSFER

The Company does not transfer your personal data abroad, neither to third countries nor to international organizations.

1. PERSONAL DATA RETENTION PERIOD

The Data Controller, also through the authorized personnel, periodically verifies that your data is not collected, processed, archived, or stored longer than necessary; that it is stored with adequate guarantees of integrity and authenticity; and that it is kept for the time strictly necessary to complete the activities related to managing the report, and in any case, not longer than five years from the closure of the procedure.

L. YOUR RIGHTS AS A DATA SUBJECT

As a data subject, you can exercise the rights enshrined in Articles 15 - 21 GDPR and, precisely, you have:

1. You have the right to access and request rectification or deletion of your personal data, or to restrict



processing related to you (art. 15 - 18 GDPR);

2. right to object to processing *ex art.* 21 GDPR;

3. right to data portability, in relation to data in electronic format only, as governed by art. 20 of the GDPR.

In relation to data for which the legal basis for processing is your consent, you have the right to withdraw such consent at any time, without prejudice to the lawfulness of the processing carried out by the Data Controller and based on the consent you provided before the withdrawal.

With regard to the methods of exercising the aforementioned rights or for questions or information regarding the processing of your data and the security measures adopted, you can in any case contact our Company at the addresses indicated in point A of this information or by writing to the email address: pollution@pollution.it

M. COMPLAINT

You have, however, the right to lodge a complaint with the territorially competent Supervisory Authority, identified, in Italy, as the Guarantor for the Protection of Personal Data.

For further information, you can visit the institutional website of the Italian Data Protection Authority at the following *web address*: www.gpdp.it