

Subject matter PRIVACY NOTICE PURSUANT TO ARTICLES 13-14 OF THE GDPR ON THE PROCESSING OF PERSONAL DATA - WHISTLEBLOWING

1. Controller

Cotonella S.P.A. (hereinafter also “Cotonella”) in the person of its legal representative, in its capacity of Data Controller, would like to inform you that EU Regulation no. 2016/679 (GDPR) and Italian Legislative Decree 196/2003 as amended govern the protection of personal data. Cotonella bases its data processing on the principles of correctness, lawfulness, transparency and necessity, as stipulated in the aforementioned legislation. For this purpose, pursuant to Articles 13-14 of the GDPR, we hereby provide you with the following information.

2. Type of data processed

The receipt and management of reports results in the processing of 'common' personal data (name, surname, job role, any other information related to the substantiated or alleged unlawful conduct). In addition, depending on the content of the reports and the files and documents attached to them, it may result in the processing of 'special' categories of personal data (data relating to health conditions, sexual orientation or trade union membership, as per Article 9 GDPR) and personal data relating to criminal convictions and offences (as per Article 10 GDPR).

3. Purpose and legal basis of the processing

Personal data are collected and processed for the purposes strictly related to the management of reports of unlawful conduct in violation of national/European regulations and, if adopted, of the Company's Code of Ethics and Organisation, Management and Control Model.

Taking into account the reference legislation (Directive EU No. 1937/2019 and Italian Legislative Decree No. 24/2023), the legal basis for such processing is therefore as follows:

- For the processing of common data, by Article 6.1 (c) GDPR (“fulfilment of a legal obligation to which the data controller is subject”).



Sede legale:

Via T. Edison, 33
25048 Sonico (BS) - Italy



Contatti:

T: +39 0364 759 311 | F: +39 0364 759 350
info@cotonella.com

- For the processing of special and judicial data, by Article 9.2. (g) GDPR

4. Methods of processing

It should be noted that the Data Controller undertakes to process, in a lawful, correct and transparent manner, only the data necessary to achieve the purposes that are indispensable for the performance of the activities reported. The processing is carried out by the Controller also with the aid of electronic means, including automated tools, and tools for receiving reports in oral form with adequate security (file encryption), organisational, technical and physical measures to protect the information from alteration, destruction, loss, theft or improper or unlawful use.

Reports and the documentation relating to their management will be retained for five years from the date on which the final outcome of the reporting procedure is disclosed.

The identity of the person making the report and any other information from which such identity may be inferred, directly or indirectly, will be processed exclusively by persons authorised to process the data in accordance with Article 29 GDPR and will not be disclosed, to other persons, without the specific consent of the same, as required by Article 12 no. 2 of the Italian Legislative Decree mentioned above. Consent is optional and is given when reporting via the platform.

5. Disclosure and transfer of data

Your data will not be disclosed, but will be processed by the following persons, listed by way of example but not limited to:

- public authorities in fulfilment of specific legal obligations and judicial authorities acting as autonomous data controllers
- external companies entrusted with report management services and IT service providers, who act as data processors pursuant to Art. 28 GDPR subject to confidentiality obligations and only for purposes pertinent to the task assigned to them
- Legal consultants that may be involved in the investigation phase
- Any departments that may be involved in the inquiry and investigation phase, authorised specifically for this purpose and bound to confidentiality

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The list of external Data Processors is available at the Company's registered office.

6. Rights of the data subject

Please note that, pursuant to Articles 15 to 22 GDPR, within the limits of Article 2-undecies of the Privacy Code, you may exercise your right to:

- a) access your personal data;
- b) rectification of data in case of inaccuracy;
- c) deletion of your data;
- d) restriction of processing;
- e) the right to data portability, i.e. to receive in a structured, commonly used and machine-readable format, the personal data provided and to have them transferred to another data controller without hindrance;
- f) the right to object to the processing, if the conditions are met.

The data subject may also lodge a complaint with the Italian Supervisory Authority for Personal Data (Autorità Garante dei dati personali) based in Piazza Venezia 11, 00187 Rome.

If you have any further questions about this policy or any privacy-related issues, or if you wish to exercise your rights, you may contact: privacy@cotonella.com .



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