

Privacy notice pursuant the personal data protection regulation – Whistleblowing

**Introduction**

Pursuant to the Regulation (EU) No. 2016/679 (General Data Protection Regulation, hereinafter "GDPR") and Legislative Decree. 24/2023 (Decree), Ballestra S.p.A. (hereinafter "Ballestra" or "Company" or "we") provides, below, the information on the processing of personal data carried out in relation to the management of reports, governed by the Whistleblowing Procedure (hereinafter "Procedure") of the Company.

**What personal data does Ballestra collect about you?**



This processing involves the collection of the following data:

- a) Common personal data pursuant to art. 4, point 1, of the GDPR of the whistleblower (in case of not anonymous reports) as well as any data of involved or mentioned persons in the report and of facilitators, as defined by the Decree, (hereinafter "Interested"), such as: personal data (e.g. name, surname, date and place of birth), contact details (e.g. landline and/or mobile telephone number, postal address/e-mail).
- b) Particular categories of data referred to in art. 9) of the GDPR, if included in the report.

**Purposes of the processing**



The processing is aimed at receiving, analyzing, investigating, and managing reports and any subsequent actions, and in particular:

- a) management of the reporting carried out pursuant to d.lgs. n. 24/2023;
- b) compliance with obligations under law or European legislation;
- c) Defence or determination of a right in civil, administrative, or criminal litigations.

**Legal basis of processing**

The legal basis for processing consists of:

- for the purposes referred to in letters a) and b), the fulfilment of a legal obligation to which the Data Controller is subject to (art. 6, par. 1, lett. c) of the GDPR);
- for the purposes referred to in letter c), by the legitimate interest of the owner (art. 6, par. 1, lett. f) of the GDPR)



**Method of treatment**

The provision of data is necessary for the achievement of the above purposes; their failure, partial or incorrect provision may result in the impossibility of the effective recognition of the safeguards provided by Legislative Decree no. 24/23.

The data processing is carried out manually and/ or through computer and telematic tools and, in any case, in order to ensure the security and confidentiality, with the exclusion of decision-making processes based only on automated tools.

### Third parties to whom Data may be disclosed

For the pursuit of the abovementioned purposes, personal data provided are made accessible only to those who, within the Company, are competent to receive or follow up the analysis activities, investigation and management of reports and any subsequent actions as indicated by the Procedure.

These subjects are conveniently instructed in order to avoid loss, access to data by unauthorized persons or unauthorized processing of data in relation to the obligations regarding the protection of personal data and the provisions of the Decree.

The data may also be processed by consultants or other external parties acting as responsible persons or independent data controllers, also according to legal regulations (e.g. public authorities, judicial authorities, etc.).

Personal data will not be disseminated or published to an audience of indeterminate subjects.

The data processed for the purposes referred to in this policy are not transferred to third countries outside the European Union or the European Economic Area (EEA) or to international organizations.



### Data Subject rights

Data subjects have the right to access at any time the data concerning themselves and to exercise the rights provided by articles 15 to 22 of the GDPR, as applicable (right of access to personal data, right to rectify them, right to obtain their deletion or right to be forgotten, right to restriction of processing, right of data portability or right to object to processing) by sending an e-mail to or writing to the contacts of the Data Controller indicated below.

In addition, data subjects have the right to lodge a complaint with the Data Protection Authority.

The exercise of these rights by the person involved or by the person mentioned in the report could be limited, in time and in the limits that this constitutes a necessary and proportionate measure, pursuant to art. 2-undecies of the Legislative Decree 196/2003 (Privacy Code), if it could result in an effective and concrete prejudice to the protection of the confidentiality of the identity of the whistleblower.

### Data Controller

For the purposes of this Privacy Policy, the Data Controller is Ballestra S.p.A. with registered office in Via P. Portaluppi n. 17, 20138, Milan, Italy. The email address of the Data Controller is: [Dssc.privacy@ballestra.com](mailto:Dssc.privacy@ballestra.com)



### How long does Ballestra retain your personal data?

The Company stores personal data according to the terms provided for by art. 14 of d.lgs. n. 24/2023, that is for the time necessary for the treatment of the report and in any case for no more than 5 years from the date of communication of the final outcome of the report.

Personal data that are manifestly not useful for the processing of a specific report are not collected or, if collected accidentally, are deleted promptly.

