

PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA IN THE CONTEXT OF WHISTLEBLOWING

Privacy Notice pursuant to Art. 13 of the
Regulation (EU) 2016/679 of the European Parliament and of the Council

We would like to inform you that the personal data you provide may be subject to processing by means of the individuals we have appointed in the event that you report alleged illegal conduct and/or irregularities of which you have become aware, in compliance with the regulations referred to herein and the confidentiality obligations therein.

Information on the processing of personal data received through the internal reporting channel (so-called whistleblowing)

Pursuant to EU Regulation No. 679/2016 (GDPR: General Data Protection Regulation), this section provides information regarding the processing of personal data as part of the procedure for handling reports received.

Data controller

COBRAPLAST SPA, with registered office in Leini (TO), str. Fornacino n. 119, in the person of its legal representative *pro tempore*.

Interested parties and data source

Within the limits of the purposes and methods defined in this notice, the following data are processed:

1. the data of the Reporter (Whistleblower), provided directly by the same to send the report;
2. the Reported Person's data, provided by the Reporter within the report and/or acquired in the course of the investigation (e.g., third party interviewed) and/or provided by the Reported Person himself during the whistleblowing procedure;
3. the data of third parties involved in the whistleblowing procedure, provided by the Reporter within the report and/or acquired in the course of the investigation (e.g., third parties interviewed) and/or provided by the data subject himself during the whistleblowing procedure.

Purpose and lawful basis for processing data

Personal data will be processed solely for the purpose of handling reports, conducting appropriate verification activities, and taking subsequent decision-making measures.

The lawful basis for the processing is represented by the obligations dictated by Legislative Decree 231/2001, Legislative Decree 24/2023 and all applicable laws, rules and regulations.

Specifically, the processing is necessary:

- a) to fulfill a legal obligation to which the Data Controller is subject (obligation to establish a reporting channel pursuant to Law No. 179/2017), as well as the Provisions issued by Authorities empowered thereof (to follow up on requests by the competent administrative or judicial authority and, more generally, public entities in compliance with legal formalities), therefore, pursuant to and for the purposes of Article 6, par.(1) point (c) of the GDPR, the same does not require the consent of the data subject;
- b) pursue the legitimate interest of the Data Controller or third parties, represented by the right to ascertain, exercise and defend its rights in any competent forum, therefore, pursuant to and for the purposes of Article 6, par. (1) point (f) of the GDPR, the same does not require the consent of the data subject.

The Company will process your Personal Data only if required or justified by law for the specific purposes stated above.

Method, scope and duration of processing

Personal data will be processed using manual procedures (paper) and computerized procedures.

Personal data will be processed solely for the purposes listed in this Privacy Notice and may be transferred to the following categories of recipients:

- the individuals who are part of the internal reporting channel Whistleblowing Management, responsible for handling reports;

- Company personnel in charge of the investigation;
- companies, entities, consortia, persons providing us with processing services or carrying out activities related to, instrumental to, or in support of that which is the subject of the notice;
- subjects whose right to access the personal data is recognized by provisions of the law or EU regulations.

Individuals in charge of processing personal data have been given instructions that also commit them to confidentiality, privacy and data security.

Protection of personal data

The Data Controller has implemented appropriate technical and organizational measures to provide an adequate level of security and confidentiality for personal data.

These measures take into consideration:

- State-of-the-art technology;
- The costs of its implementation;
- The nature of the data;
- The risk of the processing

The purpose is to protect data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, and other unlawful forms of processing.

In addition, when handling your personal data, the Data Controller:

- collects and processes personal data that are adequate, relevant, and not excessive, as required to meet the above-mentioned purposes: to this end, data that are manifestly not useful for handling a specific report are not collected. In case of accidental collection, immediate reporting is ensured;
- ensures that such personal data remain current and accurate.

At the end of the retention period, personal data will be deleted or stored in a form that does not permit the identification of data subject (e.g., irreversible anonymization), unless their further processing is necessary for the following purposes:

1. resolution of pre-litigation and/or litigation, including disciplinary litigation, initiated before the expiry of the retention period (e.g., against the Reported Person or the Reporter who had made bad faith, false or defamatory statements). In such a case, personal data will be kept until the final judgment in the legal proceedings and/or for the applicable prescriptive period following the conclusion of the disciplinary proceedings;
2. to follow up investigations/inspections by internal control functions and/or external authorities started before the expiry of the retention period. In such a case, personal data will be kept for the period strictly necessary for the completion of the investigation/inspection;
3. to follow up requests from public authorities received before the expiry of the retention period. In this case, personal data will be retained for the period strictly necessary to fulfill the requests received.

Rights of data subjects

The rights related to the personal data that the Data Controller processes are:

- RIGHT TO RECTIFICATION. You may obtain the rectification of personal data concerning you or communicated to us by you. The Data Controller shall make reasonable efforts to ensure that the personal data in its possession are accurate, complete, up-to-date and relevant, based on the most recent information available;
- RIGHT TO LIMITATION. You may obtain restriction of processing your personal data when:
 - you dispute the correctness of your personal data during the period when the Data Controller needs to verify their accuracy;
 - the data processing is unlawful and you request a restriction of processing or deletion of your personal data;

- the Data Controller no longer needs your personal data for processing purposes, but you need them to establish, exercise or defend a legal claim;

or

- as the data subject, you have objected to data processing, pending verification as to whether the Data Controller's legitimate needs override your own.
- RIGHT TO ACCESS. You may request information about your personal data, including information on which categories of personal data the Data Controller owns or controls, for what purpose they are used, where they are collected (if not directly from you), and to whom they may have been disclosed;
- RIGHT TO PORTABILITY. Following your request, the Data Controller will transfer your personal data to another Data Controller, if technically possible, provided that the processing is based on your consent or is necessary for the performance of a contract;
- RIGHT TO ERASURE. You may obtain the erasure of your personal data if:
 - personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - you object, having the right to do so, to further processing of your personal data;
 - your personal data have been unlawfully processed;

The right to erasure does not apply if data processing is required to fulfil a legal obligation or to establishment, exercise or defend a right in court;

- RIGHT TO OBJECT. You may object to the processing of your personal data at any time, provided that the processing is not based on your consent but on legitimate interests pursued by the Controller or by a third party. In such cases, your personal data will no longer be processed unless you can demonstrate compelling legitimate grounds for the processing which override the interests or for the establishment, exercise or defense of legal claims. If you object to the processing, please specify whether you wish to delete your personal data or restrict their processing;
- RIGHT TO FILE A COMPLAINT. In case of an alleged breach of applicable data protection act, you can lodge a complaint with the competent authorities in your country or in the place where the alleged breach is supposed to have taken place.

Changes to this Privacy Notice

Any future changes or additions to the processing of personal data as described in this Privacy Notice will be notified in advance by individual notification through the usual communication channels used by the Data Controller (e.g., by e-mail or via website).

Data Controller and Data Protection Officer

In order to exercise your rights set forth in art. 15 et seq., you may contact the Legal Representative of the Data Controller COBRAPLAST SPA at its offices in Leini, str. Fornacino n. 119, e-mail: cobraplastsrl@pec.it

COBRAPLAST SPA
CEO Franco Lico



Leini, 12/12/2023