



PRIVACY POLICY

December 2023
Version 1.1

WHISTLEBLOWING PROCEDURE

ATTACHMENT C

PERSONAL DATA PROCESSING POLICY

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

IN RELATION TO WHISTLEBLOWING REPORTS

1) FOREWORD

Almaviva Group companies referred to in paragraph 1 below (hereinafter "Companies"), in relation to their obligations under Legislative Decree no. 24 of 2023 and Legislative Decree no. 231 of 2001, in their role as Data Controllers and each to the extent of their remit, intend to provide their workers, partners, customers, suppliers, consultants, collaborators and, more generally, anyone in a relationship of interest with the Companies, with specific information on personal data processing that is necessary with reference to reports sent through the whistleblowing mail box, pursuant to Art. 13 of Regulation (EU) 2016/679 of the European Parliament ("GDPR") and the rules on personal data protection referred to in Legislative Decree no. 196/2003, as amended by Legislative Decree no. 101/2018 ("Privacy Code").

Unless otherwise specified, reference is made herein to the definitions laid down in Art. 4 of Regulation (EU) 2016/679.

2) DATA CONTROLLERS

Data Controllers are the following companies:

<u>Company</u>	<u>Contact details of the Controller</u>	<u>Contact details of the Data Protection Officer¹</u>
Almaviva S.p.A.	Almaviva S.p.A. via Casal Boccone 188/190 – 00137 Rome	DPO.GruppoAlmaviva@almaviva.it
Almaviva Contact S.p.A.	Almaviva S.p.A. via Casal Boccone 188/190 – 00137 Rome	DPO.GruppoAlmaviva@almaviva.it
ALMAWAVE S.p.A.	Via di Casal Boccone 188/190 - 00137 Rome	DPO.GruppoAlmaviva@almaviva.it
Lombardia Gestione S.r.l.	Via dei Missaglia, 97 - ed. B4 - 20142 Milan	DPO.GruppoAlmaviva@almaviva.it
Reactive S.r.l.	Via dei Missaglia, 97 - 20142 Milan	DPO.GruppoAlmaviva@almaviva.it
Kline S.r.l.	Via Giacomo Puccini, 5 - 20121 Milan	DPO.GruppoAlmaviva@almaviva.it
Almaviva Digitaltec S.r.l.	Via F. Lauria Centro Direzionale Isola F8 - 80143 Naples	DPO.GruppoAlmaviva@almaviva.it
Sadel S.p.A.	Via Marino Serenari, 1 - 40013 Castel Maggiore (Bo)	DPO.GruppoAlmaviva@almaviva.it
The Data Appeal Company SpA	Via del Tiratoio 1 – 50124 Florence	DPO.GruppoAlmaviva@almaviva.it
Wedoo S.r.l.	Corso Francia, 9 – 10138 Turin	
B.M. Tecnologie Industriali S.p.A. Società Benefit	Via dell'Industria, 12 – 35030 Padua	

¹ Where appointed

3) SOURCE OF DATA

Data is acquired directly with your "Report" when it is sent:

- by mail in a confidential sealed envelope addressed to the Whistleblowing Manager, at the registered office of the relevant Company
- on the platform referred to in the link published on the company's institutional website and intranet
- to the dedicated e-mail address shown in the following table:

Company	Dedicated email address
Almaviva S.p.A.	whistleblowing@Almaviva.it
Almaviva Contact S.p.A.	whistleblowing_almavivacontact@almaviva.it
Almawave S.p.A	whistleblowing@almawave.it
Lombardia Gestione S.r.l.	whistleblowing_Lombardiagestione@almaviva.it
B.M. Tecnologie Industriali S.p.A. Company Benefit	whistleblowing_BMtecnologie@almaviva.it
Reactive S.r.l.	whistleblowing@reactive-almaviva.it
Kline S.r.l.	whistleblowing@kline.it
Almaviva Digitaltec S.r.l.	whistleblowing_Digitaltec@almaviva.it
Sadel S.p.A.	whistleblowing@sadel.it
The Data Appeal Company S.p.A	whistleblowing_thedataappeal@almaviva.it
Wedoo S.r.l	whistleblowing_wedoo@almaviva.it

4) CATEGORIES OF PERSONAL DATA AND PURPOSES OF PROCESSING

The receipt and handling of whistleblowing reports gives rise to the processing of personal data concerning the reporting person, including mainly personal and contact data and, possibly, depending on the content of the report, data concerning third parties.

The report may include personal data concerning persons indicated as possible perpetrators of the unlawful conduct, as well as persons concerned in various ways by the reported events. As part of the whistleblowing channel, in fact, personal data concerning other data subjects may be processed, such as data of third parties provided by the reporting person or personal data concerning the reported person.

The Controllers will process the data provided by the reporting person to represent the alleged unlawful conduct of which he or she has become aware, in order to carry out the necessary investigation aimed at verifying the validity of the allegations and the adoption of ensuing measures.

The processing in question involves the provision – to the Manager, by sending a report – of personal data, tax code, contact data and, possibly, data on professional qualifications, as well as additional data and

information concerning the reported unlawful conduct.

Data provided will be processed exclusively for the investigation of the report pursuant to whistleblowing regulations.

In order to ensure the confidentiality of the reporting person throughout the report handling process, the identity of the same will be known only to the Manager and, if necessary, to any other previously authorized parties whom the latter may use during the investigation.

The Manager is appointed as person authorized to process data or as data processor, depending on whether an internal or external party is chosen, respectively.

Except in case of liability for slander and defamation pursuant to the Criminal Code or Art. 2043 of the Civil Code and where confidentiality is not enforceable by law (e.g. criminal, tax or administrative investigations), the identity of the reporting person is protected in all situations following his or her report. Therefore, subject to the aforementioned exceptions, the identity of the reporting person cannot be revealed without his/her express consent, and anyone receiving or being involved in report handling is required to protect the confidentiality of such information.

5) LEGAL BASIS OF DATA PROCESSING

For the purposes indicated above, the legal basis of the processing of Personal Data is represented by:

- a) your specific consent pursuant to Art. 6(1)(a) and Art. 9(2)(a) of the GDPR that you may give before sending your report, using the Report Form made available by the Controllers and published on the Companies' website
- b) the legitimate interest of the Controllers, pursuant to Art. 6(1)(f) of the GDPR, which, having become aware of your report, intend to guarantee and preserve the interests of the Company
- c) the need to comply with legal obligations to which the Controllers are subject (in particular Art. 4 et seq. of Legislative Decree no. 24 of 2023 and Art. 6(2 *bis*) et seq. of Legislative Decree 8 June 2001, no. 231)
- d) the need to establish, exercise or defend legal claims, if necessary.

6) DATA PROCESSING METHODS

Personal Data will be processed – in accordance with the principles of fairness, lawfulness and transparency – using computer, manual and/or telematic supports and/or tools, with logics strictly related to the purposes of the processing and in any case ensuring the confidentiality and security of the data and compliance with the specific obligations established by law, and may consist of any of the operations indicated in Art. 4, point 2, of the GDPR (collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, alignment, restriction, erasure or destruction) excluding disclosure, without prejudice to any legal obligations.

The availability, management, access, storage and usability of data is ensured by the adoption of technical

and organizational measures to ensure appropriate levels of security pursuant to Art. 32 of the GDPR.

7) STORAGE PERIOD

In compliance with the principle of data minimization referred to in Article 5(1)(c) of the GDPR as well as the legal obligations to which the Controllers are bound, Personal Data will be kept for the time necessary to process and investigate any report of irregularities or, if applicable, for the time necessary to establish and apply sanctions or other measures or in any case for no longer than five years (Art. 14 of Legislative Decree no. 24 2023).

Personal data that are clearly not useful to the processing of a specific report are not collected or, if collected accidentally, are erased immediately.

In any case, if court or disciplinary proceedings are brought, the personal data provided will be kept until such proceedings are closed; If, on the other hand, such proceedings are not brought, the relevant personal data will be kept for no longer than 30 days after completion of the investigation, except where the personal data are to be kept in accordance with applicable laws.

After this deadline, the data may be stored for archiving purposes, with limited access, for the sole purpose of defending legal claims in connection with possible disputes with the data subject.

8) COMMUNICATION AND DISCLOSURE OF PERSONAL DATA

The data are processed by persons specifically authorized by the Controllers and in compliance with Art. 29 of the GDPR.

Personal data will be processed exclusively by the Manager, using procedures, including computerized ones, to ensure the confidentiality of the identity of the reporting person and the content of the reports and related documentation, adopting appropriate technical and organizational measures to protect them from unauthorized or unlawful access, destruction, loss of integrity and confidentiality, even accidental.

Your Personal Data will not be disclosed unless their communication or disclosure is requested, in accordance with the law, by public bodies for defense or security purposes or for the prevention, detection or repression of crimes.

In carrying out their activities and for the purposes referred to in paragraph 3, the Controllers may communicate your Personal Data to third parties, in compliance with the Regulation and the aforementioned Measure, such as:

- Possible suppliers and consultants typically acting as data processors, pursuant to Art. 28 of the GDPR including, but not only, the control bodies of the Controllers that will act as independent Controllers
- Competent authorities (e.g. Institutions and/or Public Authorities; Judicial Authorities and Police Bodies) making a formal request to this end; in this case, the communication of data is required to comply with a legal obligation.

Your Personal Data will not be transferred to countries outside the European Union except with the guarantees provided for by law.

The full and up-to-date list of data recipients may be requested from the Controllers at the addresses indicated above.

9) RIGHTS OF DATA SUBJECTS AND HOW TO EXERCISE THEM

Pursuant to Articles 15 to 22 of the GDPR, as a data subject, you have the right to:

- obtain confirmation from the Controllers as to whether or not personal data concerning you are being processed and, if so, obtain access to your data, as well as, if the data are not collected from the Data Subject, receive all available information on their source
- know the purposes of the processing, the categories of data in question, the recipients or categories of recipients to whom the data have been or will be communicated, the envisaged data retention period or the criteria used to determine this period
- ask the Data Controllers to erase data or restrict the processing of data concerning you
- object to the processing of data, without prejudice to the right of the Controllers to evaluate your request, which may not be accepted in case of compelling legitimate grounds for the processing which override your interests, rights and freedoms
- request data portability, in the cases provided for by law.

It should also be noted that pursuant to Article 2-undecies (1)(f) of Legislative Decree no. 101/2018, the Controllers ensure the confidentiality of your identity.

These rights may be exercised by sending a request to: servizioprivacy@almaviva.it.

The rights referred to in Articles 15 to 22 of Regulation (EU) 2016/679 may be exercised within the limits of Article 2-undecies of Legislative Decree 30 June 2003, no. 196 (cf. Art. 13(2) of Legislative Decree no. 24 of 2023).

Data subjects who believe that the processing of their personal data is in violation of the Regulation also have the right to lodge a complaint with the Data Protection Authority, as provided for by Art. 77 of the Regulation, or to take legal action (Art. 79 of the Regulation).