

Privacy Policy

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR"), in relation to the management of reports of violations of EU and national regulations under Legislative Decree 24/2023, as amended, submitted via the digital communication channel ("whistleblowing platform") adopted by the data controller.

In compliance with the provisions of Articles 13 and 14 of European Regulation 2016/679 [GDPR], **GIUSTO MANETTI BATTILORO SPA** as the data controller, represented by the current legal representative, we hereby inform you of the purposes and methods of processing the personal data collected through the "**Wallbreakers**" platform, the scope of data sharing and dissemination, as well as the nature and provision of the data, specifically as follows.

1. Purpose

Management of the receipt, processing, and analysis—using a dedicated IT platform—of reports of crimes or irregularities by employees of **GIUSTO MANETTI BATTILORO SPA**, workers and collaborators of companies supplying goods or services, and entities performing activities on behalf of the data controller (so-called whistleblowing). This includes, in particular, self-employed workers, freelancers, and consultants providing services for the data controller, in accordance with Legislative Decree 24 of 10 March 2023, "*implementing Directive (EU) 2019/1937 of the European Parliament and Council, dated 23 October 2019, concerning the protection of individuals reporting violations of European Union law and containing provisions on the protection of individuals reporting breaches of national regulatory provisions*".

2. Methods

The aforementioned data will be processed lawfully and fairly, in compliance with the security obligations prescribed in EU Regulation 2016/679. Data processing is carried out through electronic and online tools, with procedures strictly related to the intended purposes, and always in a way that ensures data security and confidentiality.

3. Legal basis of the processing

Compliance with a legal obligation.

Consent of the Whistleblower (only in cases where it is required or necessary to disclose the identity of the Whistleblower).

4. Type of data processed

Personal data ("Data") refers to information about the Whistleblower, specifically: name, surname, personal email, or phone contact, as well as identification data and/or special categories of data, and data related to criminal convictions and offenses (under Articles 9 and 10 of the GDPR) pertaining to the Reported Individual and/or third parties that may be disclosed by the Whistleblower at the time of reporting. The Data Controller (hereinafter also referred to as the "Company") collects Data related to reports made exclusively through the "**Wallbreakers**" platform by **SWASCAN - TINEXTA CYBER S.P.A.**

"Whistleblower" refers to: any member of the Company's corporate bodies; employees (including those on fixed-term contracts), project-based collaborators, interns, temporary workers, consultants; and parties functionally connected to the Company, such as third parties or additional individuals bound by the requirements set forth in Legislative Decree 231/2001 and the ethical and behavioural principles adopted by the Company through specific contractual clauses, with instructions provided by the Company for making reports, including to Suppliers and Clients.

Reports can be submitted either anonymously or with identification. Regardless of the method of submission, data will not be used beyond what is necessary to appropriately address the report. To preserve investigative integrity, the reported individual may not be informed of the processing of their data by the Data Controller until the report is considered substantiated or until sufficient evidence has been gathered to support its validity. This delay will be evaluated on a case-by-case basis by the individuals responsible for the investigation, in consultation with the Data Controller, taking into account the interest in protecting evidence and preventing its destruction or alteration by the reported individual.

5. Disclosure and dissemination

Data will only be processed by individuals legally authorized to access the content of the Reports. For example, this includes members of the Company's Supervisory Body, judicial authorities, and other public or private entities with a legitimate right to request the data.

Additionally, data may be processed on behalf of the Company by external parties appointed as data processors under Article 28 of the GDPR, who are given appropriate operational instructions. These parties essentially fall into the following categories:

- **SWASCAN - TINEXTA CYBER S.P.A.**, which manages the **Wallbreakers** platform and data storage.

In exceptional cases, if the Company initiates a disciplinary procedure against the reported individual based solely on the report, the Whistleblower's Data may be disclosed to the reported individual exclusively to allow them to exercise their right to defence. This scenario may occur only with the prior express consent of the Whistleblower

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6. Transfer of data

Personal data is stored on servers located within the European Union.

7. Exercising the rights referred to from Articles 15 to 22

Under certain conditions, you have the right to exercise the rights provided by Articles 7, 8, 9, and 10 of the Privacy Code and Articles 15 through 22 of the GDPR, and in particular, to request:

- access to your personal data,
- a copy of the personal data you have provided to us (so-called portability),
- the correction of data in our possession,
- the deletion of any data for which we no longer have a legal basis for processing,
- the right to object to processing where provided by applicable law
- the withdrawal of your consent, if the processing is based on consent;
- the restriction of how we process your personal data, within the limits provided by data protection regulations.

The exercise of these rights is subject to certain exceptions intended to safeguard the public interest (for example, crime prevention or detection) and our own interests (such as maintaining professional confidentiality). Should you exercise any of the aforementioned rights, we will verify your entitlement to do so and, generally, will respond within one month.

Anyone with questions regarding the compliance with the privacy policy adopted by **GIUSTO MANETTI BATILORO SPA**, its application, the accuracy of their personal data, or the use of collected data may contact us via email at: datacontroller@manetti.it.

However, if preferred, you may submit complaints or concerns, pursuant to Article 77 of the GDPR, to the relevant data protection authority using the appropriate contact details:

- Data Protection Authority (Garante per la protezione dei dati personali) - Piazza di Monte Citorio, 121 - 00186 ROME - Fax: (+39) 06.69677.3785 - Phone: (+39) 06.696771 - Email: garante@gpdp.it – Certified email: protocollo@pec.gpdp.it.

8. Data Controller

The Data Controller is **GIUSTO MANETTI BATILORO SPA**, with registered office at Via Tosca Fiesoli, 89/M – 50013 Campi Bisenzio (FI).

The Data Controller uses external parties to carry out activities as indicated in point 4), who are appointed as external data processors.

9. Retention periods

The personal data you provided will be retained for the time strictly necessary to process the Report and, in any case, no longer than five years from the date of the final outcome of the Reporting procedure, in accordance with Article 14, paragraph 1 of Legislative Decree 24/2023, as amended, and Regulation (EU) 2016/679, Article 3, paragraph 1, letter e). After the above retention period, unless otherwise required by law, the data will be destroyed, deleted, or anonymised, in line with technical procedures for deletion and backup.

10. Nature of data provision and consequences of refusal to provide data

Providing data for the purposes outlined in Article 2) is optional. If omitted, the whistleblowing report will be treated as anonymous.

11. Changes to this Privacy Policy

This Privacy Notice may be subject to changes over time to keep users informed in the event of changes in use or regulations. We therefore recommend regularly reviewing this Notice and referring to the most updated version.