

**Policy on personal data's treatment of subjects who report offenses ("Whistleblowing")  
Articles 13 and 14 of regulation (EU) 2016/679 (hereinafter "Regulation" or "GDPR")**

This information is provided by **Bicelli SRL**, as the Personal Data Controller (hereinafter, for brevity, the "Controller"), on the treatment of whistleblowers, reported individuals, and any other third parties involved in the report (all "interested" in the processing with regards to the applicable privacy legislation), which is carried out by the same in relation to the reporting of offenses (hereinafter *whistleblowing* reports).

**1. Personal Data Controller**

The Personal Data Controller, pursuant to articles. 4 and 24 of the Regulation, is Bicelli SRL, based in Carpenedolo (BS) via G.B. Meli 112, e-mail: [info@bicelli.it](mailto:info@bicelli.it)

**2. Reporting Manager**

The reporting manager can be contacted at the following e-mail address: [whistleblowing@bicelli.it](mailto:whistleblowing@bicelli.it)

**3. Categories of Personal Data**

a) Common personal data referred to in art. 4, point 1, of the GDPR of the Reporter (in the case of anonymous reports) as well as any Persons involved or mentioned in the Report and Facilitators, as defined by the Whistleblowing Procedure (hereinafter "Interested Parties"), such as: personal data (e.g. first name, last name, date and place of birth), contact info (e.g. landline and/or mobile phone number, physical/email address).

b) Special categories of data referred to in art. 9 of the GDPR, if included in the report, which may reveal religious beliefs, political opinions, membership of parties, trade unions, etc.) or judicial data or personal data relating to criminal convictions and crimes, pursuant to art. 10 of the GDPR. This data will be used only if strictly necessary for the management of the Whistleblowing report.

**4. Purpose and Legal Basis of the Processing**

a) The data directly provided by you to report, in the interest of the company, alleged illicit conduct of which you have become aware as a result of your employment relationship, service or supply, will be processed by the Organization itself for the purpose of carrying out the necessary investigations activities aimed at verifying the validity of the reported fact and the adoption of the consequent measures.

The legal basis of the processing for the aforementioned purposes is, pursuant to Legislative Decree no. 24/2023, art.6, par. 1, lett. c) of the GDPR. The legal basis can also be found, as regards the processing of particular categories of data, in the art. 9 par. 2 lett. b) of the GDPR as the processing is necessary to fulfill the obligations and exercise the specific rights of the personal data controller or the interested party in matters of labor law and social security and social protection, as well as in the art. 9, par. 2, letter. g) of the GDPR as the processing is necessary for reasons of significant public interest on the basis of the art. 2-sexies of Legislative Decree no. 196/2003. Any processing of judicial data takes place pursuant to art. 10 GDPR in correlation with art. 2-octies of Legislative Decree no. 196/2003.

b) In protecting the company in judicial or administrative proceedings or in the event of out-of-court disputes; in responding to any requests from the competent authorities; in the security and protection of the IT reporting channel. The legal basis of the processing for the aforementioned purposes is the legitimate interest of the owner (art. 6, par. 1, letter f) of the GDPR).

The provision of data is not mandatory, as the report is voluntary and the decision on which personal data to provide, also in reference to other subjects, is left to the person reported.

#### **5. Treatment Modalities**

The data processing is carried out via a special encrypted platform, which can be reached via the corporate website. Furthermore, the processing can take place with a traditional procedure, which involves sending by mail, or hand delivery, of a closed package, with the person responsible for the report as the recipient.

In compliance with current legislation on the protection of personal data, the confidentiality of the data provided is guaranteed through suitable technical and organizational measures.

#### **6. Personal Data Retention**

Personal data that is clearly not useful for evaluating the report will be deleted immediately. The reports and related communications will be kept for five years starting from the reporting procedure's final outcome's communication date.

#### **7. Data communication**

All reports will be managed by the Reporting Manager who will proceed to verify the content and if they find elements of validity of the reported facts, they will be able to pass the outcome along for further investigation or for the adoption of relevant measures to the official bodies and to the competent company structures so that they can adopt the appropriate measures to protect the Company. If necessary, to the Judicial Authority, the Court of Auditors and the ANAC.

The staff - trained and educated - acts under the direct responsibility of the Reporting Manager and is bound by the obligation of confidentiality regarding the identity of the reporter, without prejudice to compliance with legal obligations to which the right to anonymity of the reporter himself cannot be enforced.

The data may be processed by the company in charge of managing the reporting platform in its capacity as Data Controller, pursuant to art. 28 of the Regulation.

Personal data will under no circumstances be disclosed.

No personal data of the reporter will be transferred to a third country outside the European Union or to International Organizations.

#### **8. Source of Personal Data**

The data of the interested parties in the processing, contained within the report, are provided directly by the whistleblower. Reporters may be employees and/or collaborators, administrators, consultants and, in general, all the Controller's stakeholders, or any person with a legitimate interest.

#### **9. Rights of the Interested Party**

The interested party, in the persons of the Whistleblower or the Facilitator, pursuant to art. 13 of Legislative Decree 24/2023, has the right to access the data concerning them at any time and to exercise the rights provided for in articles 15 to 22 of the GDPR, as applicable (right of access to personal data, right to rectify them, right to obtain their cancellation or so-called right to be forgotten, the right to limit processing, the right to portability of personal data or the right to object to processing), by contacting the Reporting Manager.

The interested party has the right to lodge a complaint with the Guarantor for the protection of personal data ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

Pursuant to art. 2-undecies of the Privacy Code (implementing art. 23 of the Regulation), we inform you that the aforementioned rights cannot be exercised by other interested parties if the exercise of these rights could result in an effective and concrete prejudice to confidentiality of the identity of the reporter.

The interested party may appeal to the appropriate judicial offices pursuant to art. 79 of the Regulation itself.

Last update: December 2023

Personal data controller  
**Bicelli SRL**