

Complife Italia S.r.l., as Data Controller pursuant to Articles 4 and 13 of EU Regulation 2016/679, wishes to inform you that it will process your personal data using IT tools for the purposes indicated below.

DATA CONTROLLER

The Data Controller is Complife Italia S.r.l. with registered office in via Guido Rossa, 1 – 20024 Garbagnate Milanese (MI), VAT number 11093320155, e-mail address info@complifegroup.com, Certified Electronic Mail complifeitalia@legalmail.it.

INTERNAL PERSON RECEIVING THE REPORT

The Data Controller has identified the Company's Compliance Department as the recipient, which manages and carries out a preliminary verification of the validity of the circumstances reported in the report of unlawful conduct. If the report meets the requirements of the relevant legislation, it is transmitted, via secure protocols, to the Supervisory Body (SB). The individuals involved shall do so in accordance with the principles of impartiality and confidentiality. Therefore, recipients are prohibited from revealing the identity of the Whistleblower and the contents of the report that could lead, even indirectly, to the identification of the Whistleblower.

TYPE OF DATA PROCESSED

The personal data subject to processing are those covered by the internal report and/or in documents attached to it, which refer to the reporting person or the reported person:

- a. personal identification data such as name, surname, position, role, qualification/relationship of the persons making the reports, namely: employees and collaborators (hereinafter referred to as the "Data Subjects" or "Whistleblower");
- b. personal contact details of the reporting person, such as telephone number and/or email address;
- c. personal identification data of the persons involved in the report, pursuant to Legislative Decree No. 24/2023 (so-called whistleblowing), such as data that the reporting person intended to provide to represent the facts described in the report*.

**It should be noted that in this case Complife Italia S.r.l. is unable to determine in advance the data covered by the report, which may therefore also include special categories of data pursuant to Articles 9 and 10 of the GDPR (e.g., criminal convictions, offenses, etc.).*

PURPOSE OF THE PROCESSING

The personal data you provide will be processed for purposes related to:

- a. compliance with legal requirements regarding whistleblowing, i.e. for the management of internal reports of alleged violations, acts, or omissions made pursuant to Legislative Decree No. 24/2023 and any consequent actions, and in particular the investigation of the reported facts and the adoption of any measures;
- b. the establishment, exercise, or defense of a right in court.

LEGAL NATURE OF THE PROVISION OF PERSONAL DATA

The provision of personal data included in the report is necessary in order to comply with legal obligations and related protections, pursuant to Legislative Decree No. 24/2023.

Please note that if the report is made anonymously, the personal data of the reporting party will not be processed.

LEGAL BASIS FOR PROCESSING

- The legal basis for processing for the purposes referred to in point a) is the fulfillment of a legal obligation - Legislative Decree 24/2023 – to which the Data Controller is subject pursuant to Article 6, paragraph 1, letter c) of the GDPR;

- for the purposes referred to in point b), the legal basis is found in the establishment, exercise, or defense of legal claims, pursuant to Article 9(2)(f) of the GDPR, and in the legitimate interests of the Data Controller, pursuant to Article 6(1)(f) of the GDPR;
- the processing of any special data contained in the report is based on the fulfillment of obligations and the exercise of specific rights of the Data Controller pursuant to Article 9, while the processing of data relating to criminal convictions and offenses is carried out in accordance with Article 10 of the GDPR.

CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The data processed will not be disclosed to third parties.

In addition to the Data Controller, the recipients of the acquired data may include:

- members of the Supervisory Body responsible for managing reports;
- company personnel responsible for preliminary investigations as persons authorized to process data by the Data Controller;
- IT service providers that enable the operation and maintenance of the IT tools on which the Report can be submitted, in their capacity as Data Processors;
- parties whose right to access your personal data is recognized by provisions of law or EU regulations;
- persons authorized to access it pursuant to provisions of law, regulations, and EU regulations
- ANAC, if the report is external and is submitted as provided for in Articles 6 and 7 of Legislative Decree No. 24/2023.

The list of Data Processors is available upon request.

METHODS OF DATA COLLECTION AND RETENTION PERIODS

Data processing is carried out using automated IT tools with logic related to the purposes indicated above and, in any case, in such a way as to guarantee security and confidentiality. The reporting management system guarantees, at every stage, the confidentiality of the identity of the Whistleblower, of the subject involved and/or mentioned in the report, of the content of the report and of the related documentation, without prejudice to the provisions of Article 12 of Legislative Decree No. 24/2023.

In particular, please note that the IT platform used for reporting illegal activities employs an encryption protocol that ensures the identity of the reporter is kept separate from the content of the report.

Personal data will be stored in accordance with the terms set out in Article 14 of Legislative Decree No. 24/2023, i.e. for the time necessary to process the report and in any case for no longer than 5 years from the date of notification of the final outcome of the Report.

Personal data that is clearly not useful for processing a specific report is not collected or, if collected accidentally, is promptly deleted.

TRANSFER OF DATA ABROAD

Personal data is not transferred to countries outside the European Union or to international organizations.

RIGHTS OF DATA SUBJECT

Pursuant to Articles 15-22 of the GDPR, we inform you that you may exercise your rights regarding the processing of your personal data:

- right of access to personal data - access is excluded for the protection of the reporting person as established by the relevant legislation. The Company is required to respect the confidentiality of information, and access may only be exercised to a limited extent to information not protected by the relevant legislation; right to correct and supplement personal data;
- right of rectification and integration of data;
- right to erasure ("right to be forgotten");
- right to restriction of processing;
- the right to lodge a complaint with the Data Protection Authority, following the procedures and instructions published on the Authority's official website www.garanteprivacy.it (if the exercise of these

rights could result in actual and concrete prejudice to the confidentiality of the identity of the person reporting violations or if the processing is carried out in violation of the provisions of the law);

- the right to data portability;
- the right not to be subject to a decision based solely on automated processing, including profiling

The exercise of rights is not subject to any formal restrictions and is free of charge.

In any case, this exercise may be delayed, limited, or excluded with a reasoned communication made without delay by the Data Controller, unless the communication could compromise the purpose of the limitation, for the time and to the extent that this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the reporting person, the person involved, or the persons involved in various capacities in the reports. The Data Subject has the right to exercise the above rights through the Supervisory Authority.

HOW TO EXERCISE YOUR RIGHTS

The Data Subject may exercise their rights at any time by sending:

- a registered letter with return receipt to Complife Italia S.r.l. via Guida Rossa, 1 – 20024 Garbagnate Milanese (MI)
- an email to the Data Protection Officer (DPO): dpo@complifegroup.com