

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF REPORTING PERSONS IN THE CONTEXT OF THE WHISTLEBLOWING REPORT MANAGEMENT PROCEDURE PURSUANT TO L.D. 24/2023

With this information, TAGHLEEF INDUSTRIES SPA intends to provide the indications set forth in art. 13 of EU Regulation 2016/679 (hereinafter the "Regulation") regarding the processing of personal data carried out by the company itself as part of its own management procedure of whistleblowing reports, adopted in accordance with L.D. of 10 March 2023 n.24 and, in particular, of all the activities and obligations connected to the functioning of the company system for the management of the same reports.

DATA CONTROLLER

The data controller is TAGHLEEF INDUSTRIES SPA with its registered office at 33058, San Giorgio di Nogaro (UD), via Enrico Fermi 46, and can be contacted at PERS@pec.ti-films.com

TYPES OF DATA PROCESSED

The handling of the report entails, unless the report is made anonymously, the processing of the reporter's common personal data, including personal data, contact data and data relating to professional qualifications and any special data as referred to in Art. 9 of the Regulation and any information communicated by the reporter, included in the documents enclosed by the reporter.

Personal data that are manifestly not useful for the processing of a specific report are not collected or, if accidentally collected, are deleted promptly (art. 13 L.D. 24/2023); therefore, reporting persons are requested to refrain from communicating personal data of a 'particular' and 'judicial' nature if they are not deemed necessary and indispensable for the purposes of reporting in compliance with Art. 5 of the Regulation.

PURPOSE AND LEGAL BASIS OF PROCESSING

The purpose is the management, processing and analysis of whistleblowing reports received by the Data Controller through the dedicated channel, as well as the subsequent feedback.

The processing is aimed at: i) managing the report made including the verification of the facts covered by the report, its resolution, the preparation of feedback, the adoption of any compensation or support measures for the reporting subjects and the possible establishment of proceedings, including disciplinary ones, and any other related obligations; ii) effectively prevent and combat fraudulent behaviour and illicit or irregular conduct; iii) if present, support the effective application and operation of the Organisation, Management and Control Model pursuant to L.D. 231/2001 and the Code of Ethics.

The legal basis for the processing is represented by: a) fulfilling legal obligations, including those laid down in L.D. 24/2023; b) the legitimate interest of the Data Controller in establishing or defending a right before a judicial or supervisory authority; c) in the cases covered by the same rules, specific and free consent may be required from the reporting party - pursuant to Art. 6, par. 1, lett. a) of the Regulation - and, in particular, where there is a need to disclose his/her identity, or where the recording of the reports collected orally, by



telephone or by voice messaging systems, or through direct meetings with the Manager of the reporting channel is envisaged.

NATURE OF PROVIDING PERSONAL DATA

The provision of personal data is optional, given the possibility of also forwarding anonymous reports to the Company, if they contain precise, consistent and adequately substantiated information, without prejudice to the provisions of the legislation, with regard to this case, on the subject of protection measures for the reporting person. If provided, personal data will be processed to handle the report in accordance with the limits and with the guarantees of confidentiality imposed by the relevant legislation.

PROCESSING METHODS AND CATEGORIES OF DATA RECIPIENTS

Data processing is carried out in accordance with the provisions of the law and of the Whistleblowing Management Procedure adopted by the company in compliance with the confidentiality of the identity of the person making the report, subject to the provisions of Art. 12 of L.D. 24/2023, of the reported person or of third parties involved in the report in various ways, including through the adoption of appropriate security measures.

The reports and the related data may be handled manually and/or by means of automated IT and telematic tools (inter alia, where appropriate, by voice recording) by the Manager of the reporting channel, in his/her capacity as authorised processor, if internal to the company, or as Data Processor pursuant to Art. 28 of the Regulation, if external to the company. Where certain information relating to the report is required for the purposes of the investigative activities, it may be processed by company departments that have been given specific written instructions and act as authorised processors.

The third party provider of the reporting management platform, if any, acts as Data processor.

The personal data collected may also be communicated, provided that it is necessary for the pursuit of the purposes of the processing and on the basis of the same prerequisites of lawfulness indicated, to third parties such as public administrations and in particular police forces, competent authorities (e.g. ANAC, judicial or accounting authorities), as well as to the Supervisory Board, where present.

DATA RETENTION PERIOD

The data shall be kept in accordance with the terms provided for in art. 14 of L.D. 24/2023, i.e. for as long as necessary for the processing of the report and in any case no longer than five years from the date of communication of the final outcome of the report, without prejudice to different legal obligations to which the Data Controller is bound or specific indications coming from the National Anti-Corruption Authority - ANAC.

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

DATA TRANSFER TO THIRD COUNTRIES

The data will not be transferred to third countries and, if transferred, the conditions and guarantees provided for in Art. 44 et seq. of the Regulation are complied with.

Under no circumstances will personal data be disclosed.



RIGHTS OF THE DATA SUBJECTS

Each data subject has the right to exercise the rights referred to in articles 15 et seq. of the Regulation, in order to obtain from the Data Controller, for instance, access to his/her personal data, rectification or erasure thereof, or restriction of the processing concerning him/her, without prejudice to the possibility, in the absence of adequate feedback, to lodge a complaint with the Data Protection Authority. These rights may be exercised by contacting the Data Controller at the addresses indicated.

In this regard, please note that the aforementioned rights of the persons concerned in the processing of personal data may be restricted pursuant to and for the purposes of Art. 2-*undecies* of L.D. of 30 June 2003, no. 196 ("*Privacy code*", as amended by L.D. no. 101/2018), for the time and to the extent that this constitutes a necessary and proportionate measure, if their exercise may result in concrete and effective prejudice to the confidentiality of the identity of the reporting subjects.

In such cases, the persons concerned will in any case have the right to refer the matter to the Supervisory Authority so that the latter may assess whether the prerequisites for taking action under article 160 of L.D. No. 196/2003 are met.

The Data Controller
TAGHLEE EF INDUSTRIES SPA