

## PRIVACY POLICY

The following information is provided to data subjects regarding the processing of personal data in relation to whistleblowing disclosures, pursuant to articles 13 and 14 of EU Regulation 2016/679 of 27 April 2016 (hereinafter the "Privacy Regulation").

### 1. The Data Controller

The Data Controller for any processing of personal data required to achieve the objectives stated below is Zintek S.r.l., represented by its Sole Administrator.

### 2. Personal data subject to processing

In the context of the handling of Whistleblowing Disclosures, the person making the disclosure (the "Whistleblower") may send a completely anonymous report, without divulging any personal data that could lead to his or her identity being either directly or indirectly ascertained.

If the Whistleblower decides voluntarily, freely and at his or her own discretion to provide some of his or her personal data, these data will be subject to processing.

By way of example, the processed personal data could fall under the following categories:

- personal details (e.g. first name, surname, tax code, address, date and place of birth);
- contact details (e.g. landline and/or mobile telephone number, email address);
- work-related data (e.g. seniority level, department, role at the Company, form of relationship with the Company or other third parties, profession);
- image and/or voice data;
- any information referring to the subject of the disclosure, or other interested parties, that the Whistleblower decides to share as supporting evidence for his or her disclosure;
- the information that the Whistleblower or other interested parties share with the Data Controller relating to the handling of the disclosure;
- special-category data (e.g. data relating to political opinions, religious or philosophical beliefs, membership of trade unions, genetic data, biometric data intended to unequivocally identify an individual, data regarding the person's health or sex life or sexual orientation);
- legal information;
- any other data relating to the disclosure, which may or may not fall into the categories above.

Please only provide the data necessary for handling the Whistleblowing Disclosures.

Personal data that are clearly irrelevant to the processing of the disclosure shall not be collected or, if collected accidentally, shall be deleted immediately.

### 3. Objectives

The personal data of the Whistleblower, the person of interest and any person mentioned in the disclosure shall be processed, within the limits listed above, for the purposes of:

- receiving, analysing and managing disclosures, including those made anonymously, using the dedicated communication channels, regarding alleged irregularities and/or illegal conduct ("Whistleblowing Disclosures") committed by parties that interact with the Data Controller in some way and of which the Whistleblower has become aware;
- conducting all further operations related to managing the disclosure and resulting from the need to complete these thoroughly (e.g. conducting interviews, gathering

evidence required to investigate the case, etc.) by relevant parties authorized to process the data;

- responding to any requests from the authorities, relevant bodies, etc.

#### **4. Legal basis**

To fulfil the legal obligation deriving from the provisions of Italian Legislative Decree no. 231/2001, Law 179/2017 and Italian Legislative Decree no. 24/2023 regarding the protection of parties reporting crimes, irregularities or violations of national legislation.

#### **5. Processing methods**

The data shall be processed by authorized personnel (the Whistleblowing Committee and corresponding team) with specific training in handling disclosures, who need to know the information to carry out their operations, conducted with or without using electronic tools, following the principles of lawfulness and fairness, ensuring the privacy and protecting the rights of the data subjects at all times, and in compliance with the law.

To simplify and optimize the whistleblowing process, disclosures, whether or not they are made anonymously, can be sent through specially created communication channels in various formats; Whistleblowers can also attach files and documentation as supporting evidence for their disclosure.

Appropriate technical and organizational measures have been put in place to protect confidentiality and, where applicable, anonymity.

Pursuant to Italian Legislative Decree 24/2023, the data parties may be asked for specific authorization in the following cases:

- if the identity of the Whistleblower is to be revealed to people other than those entrusted with receiving or following up the disclosures;
- when a disclosure is made orally during a meeting with the relevant personnel, so it can be documented by recording it on a storage and listening device or with a written record.

Data parties may be asked for specific authorization, accompanied by a specific communication detailing the reasons for their identity being revealed, in the following cases:

- in disciplinary proceedings, where the appeal is based in full or in part on the disclosure and where revealing the identity of the whistleblower is essential for defending the party whose disciplinary charges are being appealed;
- in proceedings launched following internal or external disclosures, where revealing the party's identity is essential, including for defending the person of interest.

#### **6. Scope**

The personal data of the Whistleblower, or the other interested parties, may be provided:

- to the company DIGITALPA or the IT service companies managing the software installed by Zintek S.r.l and appointed as Data Processors;
- to the public authorities and other parties in fulfilment of legal obligations (e.g. the legal authorities, the court of auditors, the National Anti-Corruption Authority) as Data Controllers.

Data subjects' data shall not be disseminated (i.e. made available to unknown parties).

The disclosure shall be received and managed by the Whistleblowing Committee, which is expressly authorized to process the data.

The personal data communicated with the Whistleblowing Disclosure, along with any supporting documentation, may be shared insofar as is strictly necessary with the following parties, who are obliged to maintain confidentiality:

- the Supervisory Board
- the Whistleblowing Committee's support staff, who are expressly authorized to handle the data pursuant to article 29 of the GDPR;
- any external consultants that may provide consultancy services to the Company regarding the operations involved in handling the Whistleblowing Disclosure.

The parties listed above guarantee that the identity of the Whistleblower, the person of interest and any persons mentioned in the disclosure shall remain confidential, as well as the contents of the disclosure and corresponding documentation.

## **7. Retention times**

The Data Controller shall retain the data relating to Whistleblowing Disclosures for 5 years starting from the date the final result of the disclosure procedure is communicated, except in the case of any legal requirements, disciplinary proceedings or litigation. In the event of disciplinary proceedings or litigation, the data shall be stored for the entire duration of the proceedings until the time limit for appeal has expired.

Once this time limit has expired, the data shall be deleted or anonymized.

## **8. Source of the data**

The data are provided voluntarily by the data subjects. Refusal to provide the data may mean that either the disclosure or any disputes regarding the disclosure cannot be managed correctly.

## **9. Rights of the data subjects**

Data subjects have the right to ask the Data Controller:

- to confirm whether or not their personal data is currently being processed, and, if so, obtain access to it (art. 15 - right of access);
- to rectify any inaccurate personal data or complete any incomplete personal data (art. 16 - right to rectification);
- to delete the data if one of the reasons set out in the Privacy Regulation applies (art. 17 - right to erasure);
- to restrict the processing when one of the events set out in the Privacy Regulation applies (art. 18 - right to restriction);
- to receive the data they have provided to the Data Controller in a structured, commonly used and machine-readable format and to transmit said data to another Data Controller (art. 20 - right to data portability).

Right to object (art. 21). Where data are processed in the Data Controller's legitimate interests, data subjects shall be informed immediately that they may object to this processing. In this case, the Data Controller shall no longer process the personal data unless there are compelling legitimate grounds for the processing or for the establishment, exercise or defence of a legal claim.

Data subjects may exercise their rights by writing to the Data Controller at Zintek S.r.l.'s legal headquarters or by email to [privacy@zintek.it](mailto:privacy@zintek.it), specifying the subject of their request



to the revealing of my identity as part of disciplinary proceedings, where the appeal is based in full or in part on the disclosure and where the knowledge of my identity is essential for the defence of the accused party

Consent

Do not consent

to the Whistleblowing Committee documenting the disclosure by recording it on a storage and listening device or by drafting a specific written record