

Information notice pursuant to and for the purposes of Articles 13 and 14 of Regulation (EU) 2016/679

Dear,

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter also "GDPR") containing provisions on the protection of personal data, please be advised that the company ELETTRONICA S.p.A. (hereinafter "ELETTRONICA" or "Company"), will carry out processing operations¹ of the personal data provided by you to the Company regarding the management of Whistleblowing reports.

ELETTRONICA processes data through the GlobaLeaks platform, a tool designed to facilitate the collection and management of whistleblowing reports. Access to this platform is reserved exclusively for the Whistleblowing Committee, ensuring maximum confidentiality of the reports and associated personal data, in compliance with GDPR requirements.

This data processing is carried out based on the principles of lawfulness, fairness, relevance, completeness, non-excess, and indispensability, protecting the confidentiality of your personal data and guaranteeing the necessary protection against any event that could put them at risk of violation.

Therefore, as a Data Subject pursuant to Art. 4 of the GDPR, you will find below, in a clear and concise form, the details regarding the processing of your personal data and any data of your family members pursuant to Articles 13 and 14 of the GDPR.

1. Identity and contact details of the Data Controller

Data Controller: ELETTRONICA S.p.A.

Tax Code: 00421830589 - VAT No: 00886951003

Address: Via Tiburtina Valeria km 13,700 – 00131 Rome, Italy

Email: privacy@elt.it

PEC: privacy@legalpec.elt.it

2. Purposes and legal basis of the processing

Your personal data will be processed for the following purposes:

- a) Receipt of the report by the managers;
- b) Sending any requests and/or receiving feedback to requests sent by the whistleblower and the report managers;
- c) Preliminary investigation: conducting checks on the merits of the report;
- d) Management of consequent measures, including disciplinary actions.

For the pursuit of the purposes listed above, the processing is lawful because the legal basis can be found in the fulfillment of the legal obligation under Art. 6, par. 1, letter c) of the GDPR, as described in Legislative Decree no. 24/2023. The legal basis for processing special categories of data is found in Art. 9, par. 2, letter b) of the GDPR, as the processing is necessary to fulfill obligations and exercise specific rights of the controller or the data subject in the field of employment and social security law, as well as in Art. 9, par. 2 letter g) of the GDPR, as the processing is necessary for reasons of substantial public interest based on Art. 2-sexies of Legislative Decree no. 196/2003 and subsequent amendments.

¹ Processing of Personal Data, is defined as "any operation or set of operations, whether or not by automated means, applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction" (GDPR Art. 4(2)).

The processing of personal data relating to criminal convictions and offences, that may be necessary for the management of whistleblowing reports received, is legitimate based on Art. 10 GDPR in correlation with Art. 2-octies of Legislative Decree no. 196/2003 and subsequent amendments.

3. Types of personal data collected and processed

Personal data of the data subject

The personal data collected and processed by ELETTRONICA are:

- Personal data pursuant to Art. 4 point 1 of the GDPR: identification and contact data, name and surname, email address or telephone number, data relating to the relationship with the Controller, other data that will be entered by the whistleblower when filling out the report form or subsequently acquired by the report managers during the investigation;
- Special categories of personal data pursuant to Art. 9 paragraph 1 of the GDPR;
- Judicial Data pursuant to Art. 10 of the GDPR: data relating to criminal convictions and offenses.

4. Categories of data subjects

For the purposes of this information notice pursuant to Art. 13 GDPR, the following are considered data subjects:

- The whistleblower: the natural person who reports violations acquired within their work context;
- The facilitator: a natural person who assists a whistleblower in the reporting process, operating within the same work context and whose assistance must be kept confidential;
- The person involved: the natural person mentioned in the report as the person to whom the violation is attributed or as a person otherwise implicated in the reported violation.

5. Recipients and/or categories of recipients of personal data

Your personal data may be communicated to, or come to the knowledge of, internal subjects formally authorized to process them by the Controller as report managers (as set out in the Whistleblowing Procedure – ELT Group), or to third parties that provide services necessary for the fulfillment of the purposes referred to in point 2, expressly designated as Data Processors. In particular, the external subject managing the Whistleblowing Platform may have access to the data subjects' data. A complete list of external Data Processors is constantly updated and available upon specific request to the email address privacy@elt.it.

Furthermore, the whistleblower is informed that his/her personal data may not be disclosed to anyone other than those authorised to receive or follow up on reports, who are expressly authorised to process such data in accordance with Articles 29 and 32(4) of the GDPR and Article 2-quaterdecies of Legislative Decree No 196/2003, without his/her express consent.

With express consent, data may be communicated in disciplinary proceedings against the reported person if the accusation is based on the report and the identity of the whistleblower is indispensable for the defense of the accused. Personal data may also be communicated to public bodies to fulfill legal obligations or satisfy requests from judicial or public security authorities.

6. Processing methods

Personal data processing is carried out using manual, IT, and electronic tools in compliance with adequate technical and organizational measures (Art. 32 GDPR) to guarantee security, confidentiality, accuracy, and relevance. Only authorized personnel designated by the Controller may access the databases.

7. Transfer of personal data to non-EU countries

Your personal data and those of your family members are not transferred to non-European Third Countries where the GDPR is not applied. Should this become necessary, ELETTRONICA will inform you in advance and, if necessary, your consent will be requested.

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8. Duration of processing and storage times

Data will be stored for five years from the date of the closure of the investigation relative to the report. After this term, the data will be destroyed. Personal data clearly not useful for a specific report are not collected or are deleted immediately if collected accidentally.

9. Rights of the data subject

As a Data Subject, you may exercise the following rights:

- a) Right of access (Art. 15);
- b) Right to rectification or erasure (Art. 16 and 17);
- c) Right to restriction of processing (Art. 18);
- d) Right to data portability (Art. 20);
- e) Right to object (Art. 21);
- f) Right not to be subject to automated decision-making (Art. 22).

These rights can be exercised by written request to the Controller (see point 1) specifying "Exercise of Rights ex EU Regulation no. 2016/679" in the subject line.

Communications and actions taken pursuant to Articles 15 to 22 and Article 34 are free of charge.

Should your requests prove to be manifestly unfounded or excessive, in particular due to their repetitive nature, Elettronica may, pursuant to Article 12 of the GDPR:

- a) Charge you a reasonable fee, taking into account the administrative costs incurred in providing the information or communication or taking the requested action;
- b) or refuse to comply with your request, giving reasons for its manifestly unfounded or excessive nature.

In accordance with the law, the rights listed above may be exercised by your family members, as data subjects, in the manner and form described above.

10. Communication of personal data breach

ELETTRONICA will notify you, without undue delay, of any personal data breach if it poses a high risk to your rights and freedoms.

11. Nature of data provision

Providing data is mandatory as it is necessary to fulfill a legal obligation pursuant to Art. 6, par. 1, letter c) or for a task carried out in the public interest (Art. 6, par. 1, letter e)).

The processing of "special categories" of data, as provided for in Article 9 par.1, by Elettronica (formerly "sensitive data") is carried out in accordance with Article 9(2)(b) of the GDPR, as it is necessary for the purposes of fulfilling the obligations and exercising the specific rights of the data controller or the data subject in the field of employment and social security and social protection, as well as Article 9(2) (g) of the GDPR, as it is necessary for reasons of substantial public interest pursuant to Article 2-sexies of Legislative Decree No. 196/2003 and subsequent amendments and additions.

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