

DISCLOSURE ON THE PROCESSING OF PERSONAL DATA OF REPORTED PERSONS OR THIRD PARTIES INVOLVED IN A WHISTLEBLOWING REPORT ACCORDANCE WITH ITALIAN LEGISLATIVE DECREE NO. 24/2023

Marzotto Lab s.r.l. provides hereunder the indications prescribed by the art. 13 and 14 of EU Regulation 2016/679 (hereinafter the "Regulation") regarding the processing of personal data carried out by the company itself as part of its "whistleblowing" reporting management procedure, adopted in compliance with Legislative Decree 10 March 2023 no. 24 ("Marzotto Group Whistleblowing Procedure") and, in particular, of all the activities and obligations connected to the functioning of the company system for the management of the reports in this context.

The following information is provided to potentially "interested" subjects, such as, for example, the people indicated as possible responsible for the illicit conduct (so-called reported), any "facilitator" subjects (as defined by the relevant legislation), as well as any other subject involved in a different capacity in the procedure for managing "whistleblowing" reports.

DATA CONTROLLER

The data controller is Marzotto Lab s.r.l. with registered office in Largo Santa Margherita 1, 36078 – Valdagno (VI) – Italy – PEC: marzottolab@legalmail.it, phone n. 0445/429411 (hereinafter also "Company"). The Data Controller has appointed a Contact Person for the management process of "whistleblowing" reports (hereinafter "Whistleblowing Contact Person") as defined in the aboveindicated procedure.

TYPES OF DATA SUBJECT TO THE PROCESSING

The receipt and management of such reports may give rise, depending on their content, to the processing of the following categories of personal data:

- a) common personal data referred to in art. 4, point 1, of the Regulation, including, for example, personal data (name, surname, date and place of birth), contact data (landline and/or mobile telephone number, postal address/e-mail), the job role/task;
- b) "special" personal data referred to in art. 9 of the Regulation, including, for example, information relating to health conditions, political opinions, religious or philosophical beliefs, sexual orientation or trade union membership;
- c) "judicial" personal data referred to in art. 10 of the Regulation, relating to criminal convictions and crimes, or related security measures.

PURPOSES AND LEGAL BASIS OF THE PROCESSING

The purpose is the management, processing and analysis of the whistleblowing reports the Company receives via the relevant channel and the subsequent feedback.

The processing is aimed at: i) managing the report, including checking the reported facts, resolving it, preparing the feedback, adopting any compensation or support measures for the reporting persons and possibly instituting proceedings, including disciplinary proceedings and any other related fulfilment; ii) preventing and effectively combating fraud and illegal or irregular activities; iii) supporting the effective application and operation of the Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001 and the Code of Ethics.

The legal basis of the processing includes: a) fulfilling legal obligations, including those set out in Italian Legislative Decree no. 24/2023; b) the legitimate interest of the Controller in establishing and defending legal claims before courts or monitoring bodies.

NATURE OF THE PROVISION OF PERSONAL DATA

The personal data originates from "whistleblowing" reports received through the reporting channels made available by the Company.

MODALITIES FOR DATA PROCESSING AND CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Processing is carried out in accordance with the provisions of the law and the “*Marzotto Group Whistleblowing Policy*”, respecting the confidentiality of the identity of the reporting person – without prejudice to article 12 of Italian Legislative Decree no. 24/2023, of the reported person or of the third parties involved, in several respects, in the report, also by adopting appropriate security measures. The reports and the related data may be processed manually and/or using automated IT and electronic tools, including the web platform, even, where appropriate, via voice recording,,by the Whistleblowing Contact Point acting as the Processor (article 28 of the Regulation). Where necessary, as part of the investigation, certain information concerning the report may be processed by other company departments which have been provided with specific written instructions and which are authorised to process personal data.

The third-party provider of the reporting platform acts as the Processor within the meaning of article 28 of the Regulation.

The data collected may also be disclosed to third parties, such as public administrations and, specifically, the police, competent authorities (e.g., ANAC - the Italian national anti-corruption authority, judicial or accounting authorities), and to the Supervisory Body, provided that this is necessary for the purposes of the processing and based on the same conditions for lawfulness indicated.

PERIOD OF STORAGE OF PERSONAL DATA

The data will be stored in accordance with the terms set out in article 14 of Italian Legislative Decree no. 24/2023, i.e., for no longer than is necessary for the time necessary to process the report and, in any case, no longer than five years from the date of communication of the final outcome of the report, respecting the principle of minimization established by art. 5, comma 1 letter c) of the Regulation and the other legal obligations to which the Controller is bound, without prejudice to ANAC’s specific indications.

Personal data that are manifestly not useful to process a specific report are not collected or, if accidentally collected, are erased in a timely manner.

DATA TRANSFER TO THIRD COUNTRIES

The data will not be transferred to third countries outside the European Union and, if they are transferred, the conditions and guarantees provided for by the articles will be respected. 44 and following of the Regulation.

Under no circumstances will personal data be subject to diffusion.

RIGHTS OF INTERESTED PARTIES

Each interested party has the right to exercise the rights referred to in articles 15 and following of the Regulation, in order to obtain from the Data Controller, for example, access to their personal data, the rectification or cancellation of the same or the limitation of the processing that concerns such party, without prejudice to the possibility, in the absence of adequate feedback, to submit a complaint to the Italian Data Protection Authority. These rights can be exercised by contacting the Controller at the addresses indicated.

In this regard, we inform you that the aforementioned rights of those interested in the processing of personal data may be limited pursuant to and for the purposes of the art. 2-undecies of the Legislative Decree. 30 June 2003, n. 196 (“Privacy Code”, as amended by Legislative Decree no. 101/2018), for the time and within the limits in which this constitutes a necessary and proportionate measure, if their exercise could result in a concrete and effective prejudice to confidentiality of the identity of the reporting subjects.

In such cases, interested parties will still have the right to contact the Data Protection Authority so that the latter can assess whether the conditions for acting in the manner provided for in Article 160 of the Legislative Decree are met. n. 196/2003.

The Data Controller
Marzotto Lab s.r.l.