

Monari Federzoni Spa

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**Privacy Policy****Privacy Notice Regarding the Processing of Personal Data Pursuant to Articles 13–14 of EU Regulation 2016/679****Data subjects: Whistleblower.**

Monari Federzoni Spa, in its capacity as the Controller of your personal data, pursuant to and for the purposes of EU Regulation 2016/679 (hereinafter the "GDPR"), hereby informs you that the aforementioned regulation provides for the protection of data subjects with regard to the processing of personal data and that such processing will be based on the principles of fairness, lawfulness, transparency, and the protection of your privacy and your rights.

Your personal data will be processed in accordance with the provisions of the aforementioned legislation and the confidentiality obligations set forth therein.

In addition, the Controller may become aware of special categories of personal data, including: General data and any specific data processed in connection with the management of 231 reports and whistleblowing. The processing of personal data for these special categories is carried out in accordance with Article 9 of the GDPR.

Purposes and Legal Basis for Processing: Specifically, your data will be processed for the following purposes related to compliance with legal obligations:

- receipt, analysis, and handling of the report, as well as the investigation of the facts described therein and the adoption of the resulting measures, in compliance with the provisions of Italian Legislative Decree No. 24 of March 10, 2023.

Your personal data may also, subject to your consent, be used for the following purposes:

- disclosure of your identity to persons other than those authorised to receive or follow up on reports (para. 2, Article 12 of Italian Legislative Decree No. 24/2023);

- disclosure of your identity in the proceedings, where the charge is based, in whole or in part, on the report and knowledge of your identity is essential to the defendant's defence (para. 5, Article 12 of Italian Legislative Decree No. 24/2023);
- disclosure of your identity to persons other than those authorised to receive or follow up on reports (paragraph 2, Article 12 of Italian Legislative Decree No. 24/2023) or in the proceedings, where the charge is based, in whole or in part, on the report and knowledge of your identity is essential to the defendant's defence (paragraph 5, Article 12 of Italian Legislative Decree No. 24/2023).

Providing your data is optional with regard to the purposes indicated above, and any refusal to consent to the processing will not affect the continuation of the relationship or the appropriateness of the processing itself.

Methods of Processing. Your personal data may be processed in the following ways:

- processing by electronic means.

All processing is carried out in accordance with the procedures set forth in Articles 6, 32 of the GDPR and through the implementation of the appropriate security measures provided for therein.

Your data will be processed solely by personnel expressly authorised by the Controller and, in particular, by the following categories of authorised personnel:

- Reports Manager: that is, the person(s) responsible for receiving and handling reports, appointed in accordance with Article 4, paragraph 2, of Italian Legislative Decree 24/2023;
- OdV/SB - Supervisory Body;
- RPCT - Corruption Prevention and Transparency Officer.

Disclosure: Your personal data may be disclosed to third parties for the proper management of the relationship and, in particular, to the following categories of Recipients, including all duly appointed Processors:

- public and/or private entities to which the disclosure of data is mandatory or necessary to comply with legal obligations or is otherwise necessary for the administration of the relationship;
- the provider of the whistleblowing reporting platform, duly designated as Processor pursuant to Article 28 of the GDPR.

Dissemination: Your personal data will not be disseminated in any way.

Storage Period. Please note that, in accordance with the principles of lawfulness, purpose limitation, and data minimisation, pursuant to Article 5 of the GDPR, the storage period for your personal data is:

- for as long as necessary to complete the management procedure, but in any case no longer than 5 years from the date of notification of the final outcome of the reporting procedure.

Controller: The Controller, as defined by law, is Monari Federzoni Spa (Via Carrate 24, 41030 Solara di Bomporto (MO), VAT No. 00282950369, which can be contacted at the following addresses: e-mail privacy@monarifederzoni.com, phone +39059801711) in the person of its current legal representative.

You have the right to request from the controller the erasure (right to be forgotten), restriction, updating, rectification, and portability of your personal data, as well as the right to object to the processing of such data; furthermore, you may generally exercise all the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR.

You can also view the most recent version of this privacy policy at any time by visiting the following website: <https://www.privacylab.it/informativa.php?24633508952>.

EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, even if not yet recorded, to receive such data in an intelligible form, and to lodge a complaint with the Supervisory Authority.

2. The data subject has the right to obtain information regarding:

1. the origin of the personal data;
2. the purposes and methods of processing;
3. the logic applied in the case of processing carried out with the aid of electronic means;
4. the identifying information of the controller, the processors, and the designated representative pursuant to Article 5, paragraph 2;
5. the individuals or categories of individuals to whom personal data may be disclosed or who may become aware of such data in their capacity as designated representatives within the country, processors, or persons in charge of processing.

3. The data subject has the right to obtain:

1. the updating, rectification, or—where the data subject has an interest—the supplementation of the data;
2. the erasure, anonymisation, or blocking of data processed unlawfully, including data that no longer need to be retained for the purposes for which they were collected or subsequently processed;
3. certification that the actions referred to in subparagraphs (a) and (b) have been brought to the attention—including with regard to their content—of those to whom the data have been disclosed or disseminated, except where this proves impossible or involves a cost that is manifestly disproportionate to the right being protected;
4. data portability.

4. The data subject has the right to object, in whole or in part:

1. for legitimate reasons, to the processing of personal data concerning him or her, even if such data are relevant to the purpose for which they were collected;
2. to the processing of personal data concerning him or her for the purposes of sending advertising or direct sales materials, or for conducting market research or commercial communications.