

NOTICE PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION 2016/679 ON THE PROTECTION OF PERSONAL DATA (GENERAL DATA PROTECTION REGULATION) WHISTLEBLOWER AND PERSON INVOLVED IN WHISTLEBLOWING

Pursuant to Articles 13 and 14 of EU Regulation 2016/679 (hereinafter also the "GDPR"), THE UNDERSIGNED COMPANY, as Data Controller, in the person of its legal representative pro tempore, hereby informs you that it will process the data provided by you and contained in the reports submitted, in accordance with the principles of fairness, lawfulness and transparency, and with respect for your rights and those of all data subjects, in compliance with the confidentiality obligations set out in privacy legislation and whistleblowing law.

This notice must be considered SUPPLEMENTARY to the notices already provided on the data subject (employee, supplier, customer, etc.), which are hereby incorporated by reference in their entirety.

PREAMBLE AND SUMMARY

The undersigned company is subject to the obligation to organize and manage reports of violations in accordance with the specific legislation and guidelines on so-called whistleblowing. The processing of personal data therefore derives its legitimacy from compliance with a legal obligation. This processing may occur in two cases:

- if a person submits a report
- if a person is the subject of a report

In both cases, the processing activities to be carried out are described in the company management procedures and are based on principles of confidentiality as well as transparency. External parties are involved precisely in order to balance all the interests of the parties concerned, even where these appear to be in conflict.

The company procedure defines and provides for (extract):

- **Involved Person:** the natural or legal person mentioned in the Report or in the Public Disclosure as the person to whom the Violation is attributed or as a person otherwise implicated in the Violation reported or publicly disclosed;
- **Whistleblower:** the persons who submit the report, as defined by the internal procedure;
- **Report:** communication of Information on Violations, submitted through the Reporting Channels (both internal and external); in particular, Reports are divided into:
 - Internal reports: communication of Information on Violations, submitted through the Internal Reporting Channels;
 - External reports: communication of Information on Violations, submitted through the External Reporting Channels;

1. PURPOSE OF PROCESSING

The Controller may process personal data for the receipt and management of the report, including the investigation phase, application of corrective measures, monitoring of their implementation and updating the whistleblower on the outcome of the procedure, defending itself in legal proceedings and/or defending the whistleblower.



Data processing is carried out using manual, IT and electronic tools with logic strictly related to the purposes indicated and, in any case, in a manner that ensures the security and confidentiality of the data, in compliance with applicable legislation and applying the required technical and organizational measures.

Personal data will be processed in relation to the obligations provided for by whistleblowing legislation and exclusively for the following purposes:

1. management of reports;
2. use of monitoring services for submitted reports and internal messaging
3. transparency obligations, internal and third-party audits
4. archiving of documentation relating to reports
5. protection of the legitimate interests of the company, its directors and employees in legal proceedings
6. Only with the data subject's consent, disclosure of the whistleblower's data to third parties or persons not indicated in the report management procedure
7. Only with the data subject's consent, use of the whistleblower's data in disciplinary proceedings based on the original report
8. Only with the data subject's consent, recording of interviews or minute-taking.

2. LEGAL BASIS AND LAWFULNESS OF PROCESSING

Processing activities are carried out on the basis of a legal obligation to which the Controller is subject (Article 6(1)(c) GDPR), pursuant to the applicable whistleblowing legislation, Legislative Decree no. 24/2023. Where special categories of data are provided in connection with a report, the Controller will process them pursuant to the following derogations under Article 9 GDPR, consisting of:

- the need to fulfil obligations and exercise the specific rights of the Controller or the data subject in the field of employment law, social security and social protection (Article 9(2)(b) GDPR);
- the need to establish, exercise or defend legal claims, or whenever courts are acting in their judicial capacity (Article 9(2)(f) GDPR), with regard to the processing of personal data necessary in connection with legal proceedings or pre-litigation proceedings, to assert or defend a right, including that of the Controller or a third party, before the courts, as well as in administrative, arbitration or conciliation proceedings;
- the legitimate interest of the Controller in order to meet requirements from clients and/or potential clients for participation in tenders/competitions.

Furthermore, with regard to the disclosure of the whistleblower's identity to persons other than those authorized to receive the report, and the admissibility of the report where the whistleblower's identity is necessary for the defense of the reported person, in accordance with Article 12(2) and (5) of Legislative Decree no. 24/2023, the legal basis is consent.

The whistleblower's consent is also required for the retention of recordings and/or transcripts of telephone calls, messages and conversations (Article 14(2) and (4) of Legislative Decree no. 24/2023).



For the purposes referred to in points 1, 2, 3 and 4, the legal basis for processing consists of the relevant legislation and the obligations under whistleblowing law to which the undersigned company is subject [cf. Article 6(1)(c) GDPR].

Where the report concerns conduct not covered by current legislation but provided for by internal regulations, such as conduct or omissions contrary to the principles of gender equality, the purposes referred to in points 1, 2, 3 and 4 will be based on the legitimate interest of the Controller or third parties with respect to the management of conduct that deviates from internal regulations.

For the purposes referred to in point 5, the legal basis for processing is the pursuit of the legitimate interest of the Controller or third parties in defending themselves in legal proceedings [cf. Article 6(1)(f) GDPR].

For the purposes referred to in points 6, 7 and 8, the legal basis is the data subject's consent. These processing activities will never be mandatory and will always be subject to the free conferral of consent by the whistleblower. Should the whistleblower not give consent to the processing, these purposes will not be pursued, or they will be pursued without processing the whistleblower's personal data. Any consent given may be withdrawn at any time, but withdrawal cannot affect processing already carried out and, consequently, the identity of the whistleblower may already have been communicated to third parties. The effects of processing carried out with consent will not be affected by withdrawal of consent.

3. DATA PROCESSED

The data processed are exclusively data relating to the whistleblower or the person involved that can be found in the reports: personal identity, identification document, e-mail address, content of the report.

Based on the Controller's experience, the following personal data of the data subjects may be processed:

Personal data of persons other than the whistleblower are usually provided by the whistleblower through the report or by the other interested parties (where these are heard during the investigation).

4. NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSAL

4.1 Nature of data provision

It is possible to submit a report anonymously or non-anonymously as indicated in the "Instructions for whistleblowing reports". In the case of an anonymous report, the Controller may not be able to effectively investigate the report. Therefore, where applicable, the whistleblower is invited to report any violation by providing all requested information, so as to allow the Controller to request further information. In any case, the Controller ensures that all personal data processed in the context of the report remain strictly confidential.

Please note that the legislation provides that the whistleblower must be identifiable in order to benefit from the protection regime granted by law. Failure to provide personal data requires the reports to be managed anonymously.

4.2 Consent of the reported person concerned

With regard to the reported person or any persons involved in the report, the processing of personal data contained in the report does not require any consent and, for purposes 1 to 4, does not provide

a right of objection on the part of the data subject. The person involved will in any case be informed of any reports received that concern them.

5. CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Personal data contained in reports submitted are processed by the undersigned company as Data Controller and shared with specifically designated external parties who perform a role expressly provided for in the report management procedure.

Personal data will be processed by the Report Manager, the Supervisory Body and Senior Management (board of directors), as well as by the other parties indicated in the whistleblowing management procedure, such as the human resources department with regard to the management of any disciplinary profiles identified.

Confidentiality protection is also guaranteed to all other interested parties, until the conclusion of the proceedings initiated on account of the report and in compliance with the same guarantees provided in favor of the whistleblower. However, in the event that the report is the subject of a complaint to the competent authorities, the obligation of confidentiality regarding the identity of the persons involved or mentioned in the report may cease in the manner and under the conditions provided for by applicable law.

Furthermore, all or part of the data may be shared with the following external parties, acting as independent controllers or data processors depending on the circumstances:

- lawyers and consultants providing advisory or investigative services;
- judicial, supervisory or police authorities, in cases provided for by law.

If the entire report management process is entrusted to third parties (turnkey service), those parties should also be mentioned in the role of processors and other parts of this notice should be adapted accordingly.

Also to be considered is the case of group notice where there are joint controller or processor relationships.

Personal data may not be communicated to other public and/or private entities except pursuant to a legal or regulatory provision requiring it, or with the prior consent of the data subject.

They may also be communicated to law enforcement and/or judicial authorities upon request.

Your personal data is not transferred to third parties nor disclosed or transferred abroad.

6. TRANSFERS OUTSIDE THE EU

Your personal data will not be transferred to third countries outside the European Union.

7. METHODS OF DATA PROCESSING

Processing will be carried out by means of manual or electronic or otherwise automated, IT or electronic tools, with logic strictly related to the purposes listed below and, in any case, in a manner that ensures the security and confidentiality of the data.

8. AUTOMATED DECISION-MAKING

For the purposes of the processing activities described above, no decision is taken based solely on automated processing that produces legal effects concerning you or that significantly affects you in a similar manner.

9. PERSONAL DATA RETENTION PERIOD



Aeonvis S.p.A.

Sede centrale: Viale Achille Papa 30, 20149 Milano

Tel. +39 02 36588256

Sede legale: Viale Achille Papa 30, 20149 Milano

www.aeonvis.com - info@aeonvis.com - aeonvis@pec.it

Registro delle imprese di Milano e Codice Fiscale

n. 03619580966, Partita IVA n. 03619580966

REA di Milano n. 1689961 - Capitale Sociale

Euro 120.000,00 i.v.

Personal data processed are retained on the systems for the time necessary to manage the report. Following the closure of the file relating to the report, data will be archived for 5 years or until the limitation period provided by law for the individual rights that may be exercised. After the above periods have elapsed, your data will be deleted, unless their retention is necessary for other and different purposes provided for by an express provision of law.

10. RIGHTS OF THE WHISTLEBLOWER AS DATA SUBJECT

Pursuant to and for the purposes of Articles 15–18 and 21 of the GDPR, you are recognized the following rights as a Data Subject, which you may exercise against the Controller:

- a. right to obtain from the Controller confirmation as to whether or not personal data concerning you is being processed and, where this is the case, to obtain access to personal data and information pursuant to Article 15 of the GDPR, in particular relating to the purposes of processing, the categories of personal data concerned, the recipients or categories of recipients to whom the personal data have been or will be communicated, the retention period, etc.;
- b. right to obtain rectification of inaccurate personal data concerning you, as well as the integration of incomplete data were considered incomplete, always in relation to the purposes of processing (Article 16);
- c. right to erase data ("right to be forgotten"), where one of the cases set out in Article 17 applies;
- d. right to restriction of processing, in the cases provided for by Article 18;
- e. right to object to processing pursuant to Article 21;
- f. right to withdraw consent at any time without prejudicing the lawfulness of processing based on consent given before withdrawal, only for purposes whose legal basis is consent (Article 7).

These rights may be exercised by sending a registered letter with acknowledgement of receipt or by e-mail to the Controller.

The exercise of the data subject's rights may be limited or excluded, pursuant to Privacy Legislation, in cases where the exercise of such rights could result in actual and concrete prejudice to the confidentiality of the whistleblower's identity.

Please also note that you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) or another supervisory authority pursuant to Article 13(2)(d) of the GDPR.

11. LIMITATION OF DATA SUBJECTS' RIGHTS

Pursuant to and for the purposes of Article 2-undecies(1)(f) of Legislative Decree no. 101/2018, the rights referred to in Articles 15 to 22 of the GDPR may be limited or excluded where the exercise of such rights could result in actual and concrete prejudice to the confidentiality of the identity of the whistleblower/reporting person.

The Controller reserves the right to make any changes to this notice which it considers useful, including in relation to the evolution of applicable legislation, ensuring the widest possible visibility of any changes to the data subjects.

Issued: 15 December 2023



Aeonvis S.p.A.

Sede centrale: Viale Achille Papa 30, 20149 Milano
Tel. +39 02 36588256

Sede legale: Viale Achille Papa 30, 20149 Milano
www.aeonvis.com - info@aeonvis.com - aeonvis@pec.it

Registro delle imprese di Milano e Codice Fiscale
n. 03619580966, Partita IVA n. 03619580966
REA di Milano n. 1689961 - Capitale Sociale
Euro 120.000,00 i.v.



Aeonvis S.p.A.

Sede centrale: Viale Achille Papa 30, 20149 Milano
Tel. +39 02 36588256

Sede legale: Viale Achille Papa 30, 20149 Milano
www.aeonvis.com - info@aeonvis.com - aeonvis@pec.it

Registro delle imprese di Milano e Codice Fiscale
n. 03619580966, Partita IVA n. 03619580966
REA di Milano n. 1689961 - Capitale Sociale
Euro 120.000,00 i.v.