

Pursuant to art. 13 of Regulation (EU) No. 2016/679 (hereinafter the "GDPR") Lafert S.p.A. provides below the information on the processing of personal data carried out in relation to the management system of reports of potential misconduct or suspected illegal acts received by Lafert S.p.A.

1. DATA CONTROLLER

The Data Controller is Lafert S.p.A., st. John Fitzgerald Kennedy, 43, 30027, San Donà di Piave (VE), Italy, VAT 00168750271.

2. DATA PROCESSOR AND ADDRESSEES OF REPORTS

Pursuant to art. 28 of the GDPR the Data Controller appointed the provider of the digital platform Whistleblowing Solutions AB as Data Processor. The digital platform is provided for the management of the reporting system. Whistleblowing Solutions AB will store the data but will not perform any further access to the data than is required for storage.

Pursuant to art. 6, point 1, lett. b) of Legislative Decree n. 231/2001 the Data Controller appointed the Supervisory Body. The Supervisory Body has autonomous powers of initiative and control and is responsible for the management of the reporting process. The members of Supervisory Body have been appointed persons authorised to process personal data.

3. CATEGORIES OF PERSONAL DATA

The Data Controller may have to process the following personal data after receiving a report:

- a. Common personal data pursuant to art. 4, point 1 of the GDPR of the whistleblower (if the report is not anonymous), of the reported party and of any other persons involved and/or mentioned in the report, such as:
 - personal data (e.g. name, surname, date and place of birth),
 - contact details (e.g. fixed and/or mobile telephone numbers, postal/e-mail addresses),
 - organizational data (e.g. task, position),
 - photographs, videos or audio/video contributions;
- b. Special categories of personal data pursuant to art. 9 of the GDPR, if included in the report;
- c. Personal data relating to criminal convictions and offences pursuant to art. 10 of the GDPR, if included in the report.

Through the digital platform the whistleblower can report anonymously, without being identified. Therefore, personal data are processed only if the whistleblower makes a not anonymous report, or someone is mentioned in the report.

4. THE PURPOSES AND THE JURIDICAL BASIS OF THE PROCESSING

The processing of the personal data is carried out in application of the Legislative Decree 24/2023, that requests the implementation of internal reporting systems through which the whistleblower can report potential wrongdoings of which he came to know in the field of the working environment. Therefore, pursuant to art. 6 para. 1, lett. c) of the GDPR, the legal basis for processing derives from the fulfilment of a legal obligation to which the Data Controller is subject. For this purposes the data processing will therefore cover all those operations necessary for:

- a. the execution of the activities of receiving, analysing, verifying and archiving the report;
- b. the introduction of any disciplinary measures or the adoption of other measures, which should be assessed on a case-by-case basis;
- c. the needs of internal control risks.

In addition, the personal data may be processed by the Data Controller for the defense or investigation of one of its own rights in civil, administrative or criminal disputes, and therefore, pursuant to art. 6, par. , lett. f) of the GDPR, the legal basis for such processing is the pursuit of the legitimate interest of the Data Controller.

5. PERSONAL DATA RETENTION PERIOD

The Data Controller retains the personal data only for the period necessary for the management of the report received and in any case for a period not exceeding 5 years from the date of communication of the final outcome of the management process of the whistleblower. After this period the data will be deleted.

In application of the principles of necessity and proportionality, personal data which are manifestly not useful for the management of a specific report shall not be collected or, if accidentally collected, shall be deleted without delay.

6. HOW WE PROCESS YOUR DATA

Personal data, which are necessary and instrumental for the correct management of the report, are stored in writing, or in the form of voice recording, through automated and computer systems, and only possibly on paper, according to logic strictly related to the purposes indicated above. In any case, the processing is carried out in a manner designed to ensure the security and confidentiality of the data, with particular reference to the identity of the whistleblower, the reported party and all the subjects involved and/or mentioned in the report.

7. SHARING THE DATA TO THIRD PARTIES AND DISSEMINATION

In order to pursue the purposes described above, the Data Controller may communicate personal data to third parties belonging to the following categories:

- a. judicial authorities and police bodies and/or other public administrations, within the limits and for the fulfilment of obligations laid down by law, regulations, or Community legislation, which will treat them as independent Data Controllers;
- b. consultants who will be appropriately appointed as Data Processors.

Personal Data, unless required by law, will not be disseminated or transferred to non-EU countries.

8. RIGHTS OF THE DATA SUBJECT

In relation to the processing of personal data, of each data subject can exercise the following rights set out in articles 15 to 22 of the GDPR:

- a. right of access
- b. right of rectification
- c. right to cancellation
- d. right to restriction of processing
- e. right to data portability
- f. right to object to processing
- g. right to withdraw consent
- h. right not to be subject to a decision based solely on automated processing

In addition, each data subject has the right to lodge a complaint with the "Garante Privacy".

Pursuant to art. 2-undecies of Legislative Decree n. 196/2003 the exercise of the rights provided by art. 15 art. 22 of the GDPR, may be limited if the exercise of these rights could result in an effective and concrete prejudice to the confidentiality of the identity of the whistleblower, who reports violations of which he became aware due to his employment relationship or functions. Therefore, in the case of specific limitations, the rights in question can be exercised through the "Garante Privacy" with the methods referred to in art. 160 of the same Decree.

You can exercise these rights contacting the Data Controller at the following e-mail address: lspa_privacy@shig.com.