



## REPORTING PERSON PRIVACY POLICY

*Pursuant to Article 13 of Regulation (EU) 2016/679 concerning the processing of personal data in the context of the reporting of violations under Legislative Decree 24/2023*

Pursuant to Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter referred to as "GDPR") and the applicable legislation on the protection of personal data, we inform you that the personal data provided as Reporting Person (hereinafter also "Data Subject") through this "Reporting Form" or otherwise provided in the event of internal reporting of a violation pursuant to D. Legislative Decree 24/2023, shall be processed, in compliance with the aforementioned legislation and in accordance with the principles of correctness, lawfulness and transparency by personnel authorised by SIAC SPA pursuant to Article 29 of the GDPR and Article 2-quaterdecies of the Personal Data Protection Code (Legislative Decree 196/2003)

### **1.Data Controller and Data Protection Officer**

The data controller of personal data is the Company SIAC SPA with registered office at Via Bergamo 10 in Pontirolo Nuovo (BG), which can be contacted at the e-mail address [ru@siac-group.com](mailto:ru@siac-group.com).

### **2.Purpose of processing and legal basis**

Personal data are processed for the management of internal reports of alleged violations, i.e. of conduct, acts or omissions detrimental to the public interest or to the integrity of the public administration or of the private entity, as defined in Article 2 co. 1 lett. a) of Legislative Decree 24/2023, of which the Reporting Person has become aware by reason of his or her relationship with the Controller. The personal data processed are those contained in the internal report, and/or in acts and documents annexed thereto, which refer to the Reporting Person and any other person involved.

Personal data may also be processed for the purpose of carrying out the necessary investigative activities aimed at verifying the grounds for what has been reported, as well as, where appropriate, for the adoption of suitable corrective measures and the introduction of appropriate disciplinary and/or judicial action against those responsible for violations. The legal basis legitimising the processing of personal data is represented by the fulfilment of a legal obligation to which the Data Controller is subject (Art. 6 paragraph 1, letter c) of the GDPR). The processing may also involve special data and data relating to criminal convictions and offences if included in the report in accordance with Articles 9 and 10 of the GDPR.

The identity of the worker may be disclosed also.

### **3. Categories of data recipients**

The personal data provided will be processed by the RSPP and HR as persons authorised to process them by the Data Controller, for the purpose of following up and responding to the Reports received, in compliance with the provisions of Legislative Decree 24/2023, and activating the disciplinary system envisaged, if any, as well as taking corrective action aimed at avoiding situations similar to those covered by the Report.

In the event that the Company entrusts a third party with the task of managing the reporting channel, the aforementioned personal data shall be processed by said third party as the Data Processor designated by the Data Controller pursuant to Article 28 of the GDPR. Such data will be processed exclusively through expressly authorised personnel and in compliance with the provisions of Legislative Decree 24/2023.

Personal data will not be subject to dissemination but may be transmitted to the Judicial Authorities. None of the data collected will be transferred to third countries, understood as countries not belonging to the European Economic Area (EEA). If the report is external and is submitted, as provided for by Articles 6 and 7 of Legislative Decree 24/2023, to the National Anticorruption Authority (ANAC), information on the processing of personal data will be provided by the Authority itself through the appropriate channels.

### **4. Retention time criteria**

Internal reports and the related documentation shall be retained for the time necessary for the processing of the report and in any case no longer than five years from the date of the communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set out in Article 12 of this Legislative Decree 24/2023 and the principle set out in Article 5(1)(e) of the GDPR and Article 3(1)(e) of Legislative Decree 51 of 2018. Once the maximum period of five years has elapsed, the information referring to the report may be retained by the Company in order to guarantee and preserve its right of defence and provide proof, where requested, of the proper handling of the reports received. In this case, the personal data of the reporting person will be anonymised.

### **5. Modalities of data processing**

Personal data shall be processed exclusively by expressly authorised staff, in such a way as to guarantee the confidentiality of the identity of the Reporting Person and of the content of internal reports and of the relevant documentation, by adopting appropriate technical and organisational measures to protect them against unauthorised or unlawful access, destruction, loss of integrity and confidentiality, even accidental. In order to guarantee the confidentiality of the reporting person throughout the entire duration of the handling of the internal report, the identity of the reporting person will be known by the persons expressly authorised to handle the reports. With the exception of cases in which liability for slander and defamation can be established pursuant to the

provisions of the Criminal Code or of Article 2043 of the Civil Code or, where applicable, in criminal proceedings and within the terms and limits set out in Article 329 of the Code of Criminal Procedure, the identity of the Reporting Person shall be protected in any context subsequent to the report. Therefore, subject to the aforementioned exceptions, the identity of the person making the report cannot be disclosed without his/her express consent, and all those who receive or are involved in handling the report are required to protect the confidentiality of such information.

### **6.Provision of data**

The provision of personal data is obligatory. Anonymous reports will not be taken into consideration.

### **7.Rights of data subjects**

The rights referred to in Articles 15-22 of the GDPR may be exercised, within the limits of the provisions of Art. 2-undecies, para. 3, of Legislative Decree 196/2003 et seq. by contacting the Data Controller using the contacts indicated above. In particular, the rights identified above may not be exercised by making a request to the Data Controller, or by lodging a complaint pursuant to Article 77 of the GDPR with the Supervisory Authority, where the exercise of such rights may result in actual and concrete prejudice to the confidentiality of the identity of the person reporting breaches of which he/she has become aware by reason of his/her employment relationship or duties performed. The exercise of the aforesaid rights may, in any case, be delayed, limited or excluded by reasoned notice given without delay by the Data Controller, unless such notice might jeopardise the purpose of the limitation, for such time and to the extent that this constitutes a necessary and proportionate measure, having regard to the fundamental rights and legitimate interests of the Reporting Person, the Person Involved or the persons involved in the reports. In such cases, pursuant to Article 2-undecies(3) of Legislative Decree No. 196/2003, the Data Subject is entitled to exercise the aforementioned rights through the Guarantor Authority in the manner set out in

The President



4/12/2023 - Pontirolo Nuovo