

Padua, 20 December 2023

Re: Disclosure on personal data processing pursuant to Articles 13 and 14 of EU Regulation No. 679/2016 "GDPR"

This disclosure on the processing of personal data is provided, pursuant to and for the purposes of Articles 13 and 14 of the GDPR, to all persons who report unlawful conduct they have become aware of or witnessed, as part of their relationship with Manens S.p.A. The disclosure therefore applies whenever a report is made by one of the methods indicated in the Whistleblowing Regulations.

Data controller

The Data Controller is Manens S.p.A. (Tax Code and VAT No. 04387520283), with headquarters in Corso Stati Uniti 56, 35127, Padua, Italy ("Data Controller"), which can be contacted using the following address: info@manens.com.

Personal data

The following data may be processed: (i) common personal data of whistleblowers (e.g. name, surname, contact details); (ii) personal data contained in whistleblowing reports (including, where applicable, data belonging to special categories pursuant to Article 9 of the GDPR and personal data relating to criminal convictions and offences pursuant to Article 10 of the GDPR).

Data sources

The processed data may be communicated directly by the whistleblower by means of his/her report and through any subsequent contact with the Data Controller, or it may be collated by the Data Controller itself from third parties - internal or external - from public databases, other freely accessible sources, online and offline, and in general from any other source suitable for allowing the Data Controller to carry out the necessary checks for the management of the report, in accordance with the matters envisaged by the Whistleblowing Regulations.

Purposes and legal basis of the processing - data retention period

Purpose 1: implement the reporting procedure adopted pursuant to Italian Law No. 179 of 30 November 2017 (containing "Provisions for the protection of the whistleblowers reporting crimes or irregularities of which they have become aware in the context of a public or private employment relationship") and, therefore, with the aim of carrying out the necessary investigative activities aimed at verifying the grounds for the fact being reported and the adoption of the consequent measures. Furthermore, the adoption of an internal online whistleblowing channel constitutes an obligation for the Data Controller pursuant to Italian Legislative Decree No. 24 dated 10 March 2023, which assimilates and implements (EU) Directive 2019/1937 in Italy.

Legal basis of the processing: processing is necessary for the fulfilment of legal obligations.

Data retention period: the period of time necessary for the processing of the whistleblowing report. In any event, the data is retained for the period of time necessary for the processing of the reports and in any case no longer than 5 years from the communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set out in Article 12 of Italian Legislative Decree No. 24/23. If the data collated is manifestly unnecessary or excessive for the processing of the report, it will be immediately deleted by the Data Controller.

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Manens S.p.A.

Company subject to management and coordination activities by Tifs Partecipazioni S.r.l.
VAT No. 04387520283
Quota capital Euro 1,000,000.00 fully paid-in
Enrolled care of the Padua Companies' Register under No. 04387520283
E & A Index No. Padua 385357

www.manens.com

info@manens.com

Registered offices/operational HQ

Padua - Corso Stati Uniti 56, 35127

Tel. No. +39 049 87 05110

Operational HQs

Verona - Via Campofiore 21, 37129

Tel. No. +39 045 80 36100

Padua - Via Venezia 59/15-C, 35131

Tel. No. +39 049 86 91111

Bari - Via V. Auluisio 61, 70124

Tel. No. +39 049 86 91111



Purpose 2: purposes of judicial protection, to prevent or prosecute unlawful acts.

Legal basis of the processing: the legitimate interest of the Data Controller in protecting its rights and preventing unlawful acts.

Data retention period: without prejudice to the above, in the event of a trial, the data may be processed for defence purposes until the ruling becomes final/the trial is dismissed. If the data collated is manifestly unnecessary or excessive for the processing of the report, it will be immediately deleted by the Data Controller.

Nature of data communication and consequences of non-communication

Disclosure of the whistleblower's data is optional, as it is possible to send reports completely anonymously under the conditions set out in the Whistleblowing Regulations. By contrast, the provision of the data contained in the report is necessary for the report to be received, verified and processed.

Processing methods

The data is processed not only electronically, but also in hardcopy format. The activities performed are collection, registration, retention, modification, consultation, use, transmission and deletion.

Personal data will be processed by the Whistleblowing Manager, appointed as external data supervisor pursuant to Article 28 of the GDPR.

If the whistleblowing manager deems the report to be well-founded, its content alone may be processed by persons within the Data Controller's structure specifically identified, authorised and instructed pursuant to Articles 29 and 32. 4 of the GDPR and Article 2 quaterdecies of the Privacy Code (Italian Legislative Decree No. 196/2003).

Data recipients or categories of recipients

For one or more of the above purposes, data may be shared with these Recipients:

- service providers
- Judicial Authorities

With the exception of the Judicial Authorities, all the aforementioned Recipients process the data by virtue of a specific agreement on the processing of personal data pursuant to Article 28 of the GDPR, in the capacity of data supervisors. It is possible to receive an updated list of the data supervisors at any time by contacting the Data Controller at the addresses provided above.

Transfer of personal data to a third country

The data will be processed and stored at the Data Controller's offices or in the systems of the latter's suppliers, who act as data supervisors according to agreements compliant with Article 28 of the GDPR, in Italy and within the European Union.

Rights of the data subjects to which the data refers

We hereby inform you that, in the capacity of Data Subject, pursuant to Articles 15 to 22 of the GDPR, you have the right to:

- a) request access, rectification, deletion, restriction of data concerning you;
- b) oppose the processing of your data;



- c) obtain the portability of the data, i.e. receive the data from the Data Controller in a structured, commonly used and machine-readable format and transmit it without hindrance to another data controller, including by direct transmission of the data, if technically feasible;
- d) withdraw consent to the processing of data if it constitutes the legal basis for the processing. In this case, the processing of data carried out before withdrawal remains lawful;
- e) lodge a complaint with the pertinent supervisory authority;
- f) request information regarding: the purposes of the processing; the categories of data; the recipients or categories of recipients to whom the data has been or will be disclosed, in particular if the data is transmitted to recipients in third countries or international organisations; the data retention period; if the data is not obtained from the data subject, all available information on the origin of the same.

You may exercise the aforementioned rights by writing to the Data Controller's address indicated above.

The exercise of said rights may be subject to restriction in the cases envisaged by Article 2 undecies of Italian Legislative Decree No. 196/2003, as amended – most recently, by Italian Legislative Decree No. 24/2023.

We also hereby inform you that, in the capacity of data subject, you have the right to lodge a complaint in accordance with Article 77 of the GDPR with the Data Protection Authority, in its capacity as supervisory authority.