

	<p align="center"><b>WHISTLEBLOWING PRIVACY POLICY</b></p> <p align="center">Arts. 13-14 EU Regulation no. 679 of 27 April 2016 "General Regulation on the Management of Whistleblowing Reports"</p>	<p align="center">ISW Rev. 00</p>
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This information is intended for the authors of reports, the natural persons who assist the whistleblower in the reporting process (so-called facilitators) and finally the natural persons, to whom the information content of the report may refer, as subjects involved in various ways in the reported events.

Reports and related personal data are managed by the Whistleblowing Manager of Eurolls Industrial S.p.A., composed of the subjects indicated in the "Whistleblowing Reporting Management Procedure" (hereinafter also referred to as the "Procedure").

To this end, the Data Controller informs, pursuant to art. 13 and 14 of the General Data Protection Regulation EU 2016/679 (hereinafter also "GDPR"), that the personal data acquired as part of the whistleblowing procedure will be processed in the following ways and for the following purposes.



### 1. WHO IS THE DATA CONTROLLER?

The data controller is the company EUROLLS INDUSTRIAL S.p.A. with registered office in 33040 Attimis (UD), via Malignani n. 14 (P.I. 02314240306).



### 2. WHAT PERSONAL DATA DO WE COLLECT AND PROCESS?

The following types of personal data may be processed:

- identification and contact details of the whistleblower;
- identification data of the persons involved in the report, information and data relating to the reported violations, including any personal data relating to special categories or referring to criminal convictions and offences;
- any other information relating to the whistleblower, to the persons involved in the report to any other third parties, which the whistleblower decides to share in order to better describe the suspected violation;
- identification, contact and account data for access to the IT platform of the persons in charge of managing reports.



### 3. ORIGIN OF THE DATA AND NATURE OF THE PROVISION

The personal data subject to processing are those provided by the whistleblower and those possibly collected autonomously during the preliminary activities, necessary to ascertain the circumstances covered by the report.

The provision of data is necessary and functional to the management of the reports received in the forms and methods described in the Procedure.



### 4. PURPOSE OF THE PROCESSING AND LEGAL BASIS

Personal data will be collected and processed for purposes related to the management of reports of breaches concerning: i) national and European legislation relating to sectors and interests relevant to the Union; (ii) other civil, administrative and accounting offences covered by national law; with the methods and tools described in the Procedure.

The legal basis is the fulfilment of a legal obligation to which the Data Controller is subject (Article 6 – paragraph 1 letter c) in application of Legislative Decree 24/2023.

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## 5. RETENTION TIMES

The reports and the related documentation are kept for the time necessary to process the report and in any case no longer than five years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations of the reporting person.

Personal data that is clearly not useful for the evaluation of the report will be deleted immediately.



## 6. TO WHOM MAY YOUR PERSONAL DATA BE DISCLOSED?

Personal data will be processed by the Whistleblowing Manager, in its capacity as data processor, in accordance with the provisions of current legislation on the subject and the Whistleblowing Procedure adopted by the Company. The Manager is required to ensure the confidentiality of the identity of the whistleblower and the information of which it has become aware.

The identity of the whistleblower or any other information from which such identity can be inferred, directly or indirectly, may only be revealed with the express consent of the reporting person himself. Where necessary for needs related to the investigative activities, some information related to the report may be processed by:

other functions of the Companies to which specific instructions have been provided;

consultancy, auditing/auditing firms or entities that perform services instrumental to the purposes indicated above, limited to the information necessary for the functions assigned to them.

The IT platform for the management of reports is managed by the company Net Patrol Italia S.r.l., with registered office in 20124 Milan, Via Napo Torriani n. 31, designated as data processor. The platform's encryption system does not allow the person responsible to access the identity of the whistleblower or the content of the reports.

Finally, some data may be transmitted, in the cases provided, to the Judicial Authority and/or to the competent Authorities.



## 7. WHAT ARE YOUR RIGHTS?

With regard to the data itself, the Data Subjects may exercise, in the cases provided, the rights referred to in CHAPTER III of EU Regulation 2016/679 (GDPR).

In particular, the whistleblower may exercise the right of access to his/her data, rectification or integration, cancellation and limitation of processing in the same manner in which he/she made the report.

The whistleblower also has the right to lodge a complaint with one of the supervisory authorities responsible for compliance with the rules on the protection of personal data, if he/she believes that the processing of his/her personal data has been carried out unlawfully (Article 77 of the GDPR). In Italy, the complaint can be submitted to the Italian Data Protection Authority.

Please note that the exercise of the aforementioned rights by other data subjects, such as the reported person or other persons involved, may be delayed, limited or excluded if such exercise may result in an actual and concrete prejudice to the confidentiality of the identity of the whistleblower as provided for by Article 2-undecies, letter f of the Privacy Code (in implementation of Article 23 of the GDPR). In such cases, the aforementioned rights may be exercised through the Guarantor for the Protection of Personal Data, in the manner set out in Article 160 of the Privacy Code.