

Personal Data Processing Policy
(Art. 13 EU Regulation 679/16)

in relation to the personal data of whistleblowers, managed as a result of reports relating to alleged irregularities or unlawful conduct in accordance with the whistleblowing procedure adopted by Gruppo Novellini

Pursuant to Article 13 of 679/16/EU Regulation (hereinafter, for the sake of brevity "GDPR") and the Code on the protection of personal data (Italian Legislative Decree 196/2003) as compatible, as well as current legislation on the protection of whistleblowers (so-called whistleblowing – Italian Legislative Decree 24/2023 and Italian Law 179/2017) Gruppo Novellini, in particular in relation to the companies concerned by the application of the legislation in question (Novellini S.p.a., Novamec S.r.l. and Novellini Industries S.r.l.), as Data Controllers, provides you with the following information relating to the processing of the data you have transmitted by sending a report relating to irregularities and/or unlawful conduct committed by employees, managers or other persons working on behalf of the aforementioned companies.

A) IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The data controller is the company part of the Novellini Group in relation to which you make the report. Therefore, depending on the company that you will indicate as the recipient of the report or in any event in relation to which the report refers, one of the following companies shall be the data controller:

NOVELLINI S.P.A.

registered office in Via Mantova no. 1023, Borgo Virgilio - Fraz. Romanore (MN), Tax Code - VAT no. 00690100201, Tel.: 0376/6421, Fax: 0376/642450 E-mail: privacy@novellini.it, website <https://www.novellini.it/>, certified email address (PEC): fornitori.novellini@pec.it

NOVELLINI INDUSTRIES S.R.L.

Registered office in Via Mantova n. 1023, Borgo Virgilio - Fraz. Romanore (MN), Tax Code - VAT no. 00675930200, Tel.: 0376/6421, Fax: 0376/642450, E-mail: privacy@novellini.it, website <https://www.novellini.it/>, certified e-mail address (PEC): novellini.industries@pec.it

NOVALMEC S.R.L.

registered office in Via Mantova no. 1023, Borgo Virgilio - Fraz. Romanore (MN), Tax Code - VAT no. 02583720202, Tel. : 0376/6421, Fax: 0376/642450, E-mail: privacy@novellini.it, website <https://www.novellini.it/>, certified e-mail address (PEC): novalmecsrl@legalmail.it

Please note that the reports are managed through the portal provided by the company INAZ S.r.l. Società Unipersonale (with a sole shareholder), with registered office in Viale Monza no. 268, 20128 Milan, VAT no. 05026960962, E-mail: info@inaz.it, certified email address (PEC): inaz@legalmail.it, specifically designated by the data controller as "data processor" pursuant to art. 28 of (EU) 679/2016 Regulation (GDPR).

The data controller has identified a group DPO who can be contacted at: dpo@novellini.it

We also inform you that the manager of the reports has been identified in the Supervisory Body appointed by the Board of Directors of the company pursuant to Italian Legislative Decree 231/01, specifically in the person of the external member, Ms. Valeria Bortolotti (valeria.bortolotti@studiovblex.it).

B) TYPE OF DATA PROCESSED

Personal data in the event of reports made in a non-anonymous form through the <https://novellinispa.signalact-inaz.it/whistleblowing/> portal are data of a common nature that may enable us to identify you as well as to contact you if strictly necessary. In the event that you optionally provide the above data, they may relate to your first and last name, telephone number, e-mail address and any other data you voluntarily provide in the context of the report.

In general, reports may have the widest and most heterogeneous content, so the data processed are those that the whistleblower spontaneously and freely decides to provide to describe what is the subject of the report. For this reason, it is difficult to state in advance the data that is the subject of a report.

In this regard, it should be noted that the Data Controller has not provided for the mandatory acquisition of your personal data that may be attributable to the special categories referred to in art. 9 par. 1 of EU 679/16 Regulation (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data relating to health or sex life or sexual orientation) or data concerning you relating to criminal convictions, offences and/or security measures (Article 10 EU Regulation 679/16); however, if you decide to transmit them spontaneously, they will be processed in compliance with current legislation. In any event, personal data of any kind that are clearly not useful for processing a specific report are not collected or, if accidentally collected, are erased immediately, in compliance with the principle of minimisation.

C) METHODS OF PROCESSING.

The aforementioned data shall be processed by computer and paper media in such a way as to guarantee suitable security and confidentiality measures.

Documentation in paper format is limited to the bare minimum and stored and guarded in cabinets and rooms equipped with security locks and accessible only to authorised persons.

With reference to the portal accessible at <https://novellinispa.signalact-inaz.it/whistleblowing/>, it should be noted that the personal data provided by the whistleblower at the time of registration and the information contained in the reports and any documents attached thereto, as well as any data acquired during the investigation, shall be processed according to the principles of correctness, lawfulness, transparency and protection of confidentiality and the rights of all data subjects (whistleblower, subject of the report and any third parties involved), in compliance with the obligations imposed by privacy legislation (679/16 UE Regulation and of Italian Legislative Decree 196/2003) and on the protection of whistleblowers (Italian Law no. 179/2017 and Italian Legislative Decree 24/23). The processing shall be carried out using organisational and processing logics strictly related to the purposes indicated above and in any event in such a way as to guarantee the security, integrity and confidentiality of the data in compliance with the organisational, physical and logical measures as set forth by the provisions in force. The data controller adopts all the guarantees provided by law in order to protect the confidentiality of the identity of the whistleblower, so that it is not disclosed to third parties without the express consent of the latter, except in the event of bad faith or defamatory reports and where anonymity is not enforceable by law. In particular, with regard to the use of the Platform, it should be noted that the whistleblower's personal identification data is stored in such a way as to guarantee anonymity. The association of the identity of the whistleblower to the report can, in fact, only be carried out by those authorised to handle reports. Encryption techniques are also applied, thus guaranteeing the confidentiality of the information transmitted. Since suspected breaches can be reported through the Platform also in an anonymous form, the subjects who enter them are not required to make their personal data known. However, even in relation to anonymous reports, it cannot be excluded that, during the examination of the same, the subjects authorised to manage the procedure receive information

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(Art. 13 EU Regulation 679/16)

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containing identification data, professional data, or financial data concerning the same whistleblower and the other aforementioned categories concerned (subject of the report, third parties) that shall be processed pursuant to this policy.

D) PURPOSE AND LEGAL BASIS OF PROCESSING

Purpose of the processing: The data are processed for the purpose of carrying out the necessary investigative activities aimed at collecting and verifying the substantiation of the fact subject to reporting and the adoption of the consequent measures, both in disciplinary terms and, where they are detected, for the ascertainment of criminal liability relating to the subject of reporting.

Legal grounds for processing:

- Art. 6 par. 1, letter c), EU Regulation 679/16: the processing is necessary in order to fulfil a legal obligation to which the data controller is subject. In particular, the legal obligation in the event in question derives from compliance with the provisions of art. 6 of Italian Legislative Decree 231/01 (Top-level subjects and organisational models of the entity) and 7 (Subjects submitted to third party's management and organisational models of the entity, as well as organisational and management models suitable for preventing crimes of the kind that occurred), as well as the current regulations on the protection of persons who report breaches (whistleblowing) pursuant to Italian Law 179/2017 and Italian Legislative Decree 24/2023.

- Art. 6 par. 1, letter a) EU Regulation 679/16: the data subject has given his/her consent to the processing of his/her personal data for one or more specific purposes. In particular, consent is necessary for the communication of his/her identity and any other information from which the same may be directly or indirectly identified, to persons other than those expressly authorised to process such data. It is understood that, in the context of criminal proceedings, the identity of the reporting person is covered by secrecy in the manner and within the limits established by art. 329 of the Italian Code of Criminal Procedure. If a disciplinary dispute is based, in whole or in part, on your report, and the knowledge of your identity is essential for the defence of the accused, we will ask for your express consent to the disclosure of your identity. In these situations, your consent shall be promptly and expressly requested.

- With regard to the possible processing of data belonging to particular categories referred to in art. 9 of EU Regulation 679/16, or possibly personal data relating to criminal convictions and offences referred to in art. 10 EU Regulation 679/16, the processing is necessary to fulfil the obligations and exercise the specific rights of the data controller or data subject in accordance with the provisions of current legislation on the management of reports and protection of those who report breaches, to which the Data Controller is subject (ref. art. 9 par. 2, lett. b and art. 10 EU Regulation 679/16). It should be noted that, in the event that data of a particular nature or relating to criminal convictions and offences deemed not useful or relevant to the management of the report are provided, they shall be promptly erased and removed from the report itself.

- Art. 6 par. 1, letter f) EU Regulation 679/16: the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties, provided that the interests or fundamental rights and freedoms of the data subject that require the protection of personal data do not prevail, in particular in the event that the data subject is a child; in particular, the processing may be aimed at establishing, exercising and/or defending a right of the Data Controller or third parties, including employees of the Data Controller, in court and/or in the context of a disciplinary proceeding.

E) NEED FOR THE PROVISION OF DATA AND CONSEQUENCES OF NON-DISCLOSURE OF DATA

The provision of the whistleblower's personal data is optional and not mandatory. Failure to communicate the data, or failure to respond to requests for information, could make it objectively impossible to fully manage your report. Failure to provide data and/or information or the provision of insufficient data and/or information could make it impossible or extremely difficult to establish whether the report made is well-founded, if it is not substantiated, based on precise and concordant elements, does not relate to verifiable facts and/or does not contain all the elements necessary to carry out the aforementioned determination.

F) RECIPIENTS OR POSSIBLE CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

Your personal data will be processed exclusively by the persons competent to receive or follow up on the reports (and therefore in the context of the process of receipt, analysis, investigation and any consequent actions) expressly authorised to process such data pursuant to articles 29 and 32 par. 4 of EU Regulation 679/16 and art. 2 *quaterdecies* of Italian Legislative Decree 196/2003, as well as by any data processors responsible for the management and technical maintenance of the platform and specifically appointed as data processors pursuant to art. 28 EU Regulation 679/16 or in any event duly authorised. These subjects are properly instructed in order to avoid compromising the confidentiality, integrity and availability of the data and information transmitted with the report.

Within the framework of disciplinary proceedings, your identity may, with your consent, be disclosed where the dispute is based, in whole or in part, on the report and knowledge of your identity is essential for the defence of the accused subject. The Data Controller may also use, for support in the management of the report, any consultants (without limitation, in legal, tax, accounting and tax matters), who are bound to confidentiality or in any event duly informed and instructed by the Data Controller as to the obligations of confidentiality concerning the processing of data.

Where applicable, your personal data may also be disclosed to public bodies (e.g. judicial authorities, police, etc.). For example, your data may be known by the judicial authority where your report results in criminal proceedings, where the identity of the whistleblower is covered by secrecy in the manner and within the limits provided for by art. 329 of the Italian Code of Criminal Procedure.

In any event, your personal data shall not be disseminated.

G) TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES AND INTERNATIONAL ORGANISATIONS

The Data Controller does not currently transfer the data subject to the processing referred to in this policy to countries that are not part of the European Union, nor to international organisations. In the event of a change in this circumstance in the future, the Data Controller undertakes to verify the presence of adequate guarantees in relation to the processing, making the relevant information available to you in any event.

H) STORAGE PERIOD

It is not possible to previously determine the period for which the personal data will be stored in a unique way as it is strictly related to the management of the investigation and, therefore, to the complexity of the same; however, it should be noted that they will be processed for the time strictly necessary to carry out the investigation for the management of the report and any procedures arising from the management of the report (disciplinary, criminal, accounting). The maximum storage period, pursuant to art. 14 of Italian Legislative Decree 24/23 is set at five years of the date of communication of the final outcome of the reporting procedure, in compliance with the principle of confidentiality pursuant to art. 12 of the same Italian Legislative Decree 24/23 and the principle of limitation of storage referred to in art. 5 par. 1.1(e) EU Regulation 679/16. With regard to the storage of data by the competent Authorities for the purposes of prevention, investigation, assessment and prosecution of crimes or execution of criminal sanctions, it should be noted that such storage is beyond the control and/or decision-making power of the Data Controller. In any event, the obligations set forth in Italian Legislative Decree 51/2018, and in particular,

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(Art. 13 EU Regulation 679/16)

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with reference to storage, Article 3, paragraph 1, letter e) of the mentioned decree, applies. This provision states that such Authorities shall store the data in a manner that allows for the identification of data subjects only for the time necessary to achieve the purposes for which they are processed, subject to periodic review to verify the continued necessity of storage, and that the data shall be erased or anonymized once this period has expired.

It should be noted that if an agreement, transaction, or other document or deed from which an economic flow derives, or another title (e.g. judgement), the data shall be stored for 10 years for administrative and accounting purposes together with only the agreement or transaction or deed or document that is the cause of the flow under consideration.

In order to ensure constant monitoring regarding the effectiveness of the Organization, Management and Control Model adopted pursuant to Italian Legislative Decree 231/01, at the end of the procedure arising from the report, the same and the consequent measures may also be kept for a further period, after anonymisation (i.e. erasure of your personal data), in order to record historically and for statistical reasons the relevant events in relation to the organisation of the Data Controller.

I) RIGHTS PURSUANT TO 679/16/EU REGULATION

EU Regulation 679/16 grants data subjects the following rights with regard to personal data:

- **access** (art. 15 EU Regulation 679/16): you have the right to obtain from the data controller confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the information relating to the processing itself (purposes, categories of data, recipients or categories of recipients to whom the data are disclosed, storage period, possibility of exercising other rights in relation to the data in question, origin of the data themselves, existence of an automated decision-making process), as well as a copy of the data being processed.

- **rectification** (art. 16 EU Regulation 679/16): You have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you also have the right to have incomplete personal data completed, including by means of providing a statement to this effect.

- **erasure** (art. 17 EU Regulation 679/16): you have the right to obtain from the data controller the erasure of personal data concerning you without undue delay, unless there are reasons that prevent the processing of the same request (for example, the fulfilment of a legal obligation, or the establishment, exercise or defence of legal claims).

- **restriction of processing** (art. 18 EU Regulation 679/16): you have the right to obtain it from the data controller in certain circumstances (e.g. when you contest its inaccuracy, when the processing is lawful and you oppose the erasure by requesting the restriction of its use, when you need the data to establish, exercise or defend legal claims; when you have filed an opposition pending the verification whether the legitimate grounds of the data controller override yours).

- **portability** (art. 20 EU Regulation 679/16): you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller. The right to portability shall not adversely affect the rights and freedoms of others.

- **objection to processing*** (art. 21 EU Regulation 679/16): you have the right to object at any time, to processing of personal data concerning you on grounds relating to your particular situation, and which is based on the pursuit of the legitimate interest of the data controller. In the event of your opposition, the Data Controller will refrain from further processing your personal data unless the existence of compelling, legitimate reasons to proceed with the processing that prevail over your interests, rights and freedoms or else for the establishment, exercise or defence of legal claims, is demonstrated. In any event, these reasons shall be communicated to you.

***Notes on the right of opposition:** In relation to the right of opposition, we would like to point out that it is essential for us to know the particular situation that concerns you and that is the cause of your request for opposition, so that we can evaluate, also thanks to your active cooperation, the effective opportunity to proceed with a new judgment of balancing the interests relating to your request. We confirm that we will also treat the information that you kindly provide to follow up on your request for opposition and relating to your particular situation with the utmost confidentiality and, in any event, in compliance with the principle of minimization. In the event of opposition, your personal data will no longer be processed, provided that there are no legitimate reasons that allow the Data Controller to continue processing, as they override your rights and interests, such as, for example, in the event that your data are indispensable for the establishment, exercise or defence of legal claims or rights of the Data Controller or third parties (e.g. employees).

Withdrawal of consent: Pursuant to art. 7 of EU Regulation 679/16, where the processing is based on your consent, you may at any time revoke any consent given for specific treatments, without this affecting in any way the lawfulness of those carried out before such revocation.

Right to lodge a complaint: The protection of your privacy and your data is a priority for us, so we are committed with the utmost seriousness and with every effort to respond satisfactorily to any complaints or reports on the methods of processing your Data, remaining available even only to provide you with any clarifications regarding the processing and respond to your concerns. However, if you wish, or if in any event you are not satisfied with our response, you may lodge a complaint with the Supervisor for the protection of personal data by registered letter with return receipt addressed to: "Garante per la protezione dei dati personali, Piazza Venezia, 11 - 00187 Rome", or by certified email to protocollo@pec.gpdp.it. For more information regarding the submission of complaints, we suggest that you always consult the Guarantor's website: www.garanteprivacy.it. The full text of the articles of 679/2016 EU Regulation relating to or in any event connected to your rights (Articles 15 to 22 and 34) can be consulted at any time on the website of the Supervisor for the protection of personal data www.garanteprivacy.it.

To exercise your rights in relation to the processing of personal data, you can contact the Data Controller in total freedom and in any form you deem most appropriate, using the contact details indicated in this policy or through the same portal dedicated to the management of reports, where you deem it preferable.

Amendments and updates

The Data Controller reserves the right to update and/or modify this information at any time in order to ensure its timeliness and consistency with the provisions of the law and the treatments actually implemented. For this reason, data subjects are invited to periodically consult this information to check for any changes of interest.

Novellini Group
Novellini S.p.a.
Novalmec S.r.l.
Novellini Industries S.r.l.

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