



SIPOL S.p.A.

Via Leonardo Da Vinci, 5 | 27036 Mortara PV | ITALY
Tel +39 0384 295237 | Fax +39 0384 295084
sipol@sipol.com | sipol@pec.sipol.it | www.sipol.com
Cap. Soc. € 600.000 i.v.-R.E.A. PV n. 225329
Reg. Imprese di Pavia PV 01669490037
P.I. IT 01842120188 | C.F. 01669490037



WHISTLEBLOWING REPORTS DISCLOSURE PURSUANT TO ARTS. 13 AND 14 OF THE EUROPEAN REGULATION ON THE PROTECTION OF PERSONAL DATA 2016/679 (GDPR)

Dear Data Subject, in implementation of arts. 13 and 14 of the GDPR 2016/679 (European Regulation on the protection of personal data), this disclosure is provided regarding the processing of personal data relating to the scope of "Whistleblowing Report Management" processing.

If the report is received from a person linked to an employment relationship and/or a collaboration with Sipol S.p.a., this disclosure must be understood as supplementary and not a substitute for the disclosure already provided to personnel for the management of the employment relationship and/or collaboration.

1) IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER: the Data Controller is the Company Sipol S.p.A. – Via Leonardo Da Vinci, 5 – 27036 Mortara (PV) – VAT no. 01842120188 | Tax Code 01669490037 – Tel. +39 0384 295237 - privacy@sipol.com.

2) DATA PROCESSED: the personal data subject to processing are, if the Whistleblower decides to reveal their identity, the personal data of the Whistleblower and their contact data (as well as any further information provided in the context of the Whistleblowing Report). Additionally there are the identification data of the reported subject and/or the names of other subjects who may report on the facts subject to a Whistleblowing Report (Persons Involved) and any information and facts related to the Whistleblowing Report that may also be obtained from the attached documents and files.

In addition, in the context of the reports, data may be provided within the so-called "special categories of personal data" pursuant to art. 9 of the GDPR (such as data capable of revealing racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organisations of a religious, philosophical, political or trade union nature, as well as personal data capable of revealing the state of health and sexual life) and in the so-called "judicial data" pursuant to art. 10 of the GDPR (such as data relating to criminal convictions and crimes).

In general, the Whistleblower is advised not to provide such categories of personal or third party data unless this is strictly essential and necessary for the purposes of Whistleblowing reporting.

3) SOURCE OF DATA: the data of the Whistleblower, those of the reported party and/or third parties are provided directly by the Whistleblower themselves and/or by third parties during the investigation activities.

4) PURPOSES OF PROCESSING AND LEGAL BASIS FOR PROCESSING: we process personal data in accordance with the provisions of General Regulation (EU) no. 2016/679 on data protection for the following purposes:

a) Purposes related to legal obligations to which the Data Controller is subject (art.6 para.1 lett.c) of the GDPR): for the fulfilment of legal obligations: management of the Whistleblowing procedure, in accordance with the provisions of Italian Legislative Decree 10 March 2023, no. 24, containing "Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and containing provisions concerning the protection of persons who report breaches of national regulatory provisions" and Italian Legislative Decree 231/01.

b) For the pursuit of the legitimate interest of the data controller (art. 6 para. 1 lett. f) of the GDPR): if necessary, in order to adopt the measures resulting from the report and, in general, to safeguard our legitimate interests or those of third parties. Your prior consent is not required for this purpose.

c) Purposes for which the express consent of the Data Subject is required (art.6 para.1 lett.a) of the GDPR): if, for investigative purposes, it is necessary to reveal your identity to persons other than the manager of the reporting channel, you will be expressly requested to consent; subject to consent, the identity of the Whistleblower will be revealed only to allow the accused or the person involved to defend themselves in the context of a disciplinary proceeding, pursuant to art. 12, paragraphs 5 and 6 of Italian Legislative Decree 24/2023.

5) RECIPIENTS OF PERSONAL DATA: personal data will be processed by the members of the designated Supervisory Body pursuant to Italian Legislative Decree 231/01, as subjects expressly authorised to process, authorised subjects who are responsible for the preliminary assessment of the validity and adequacy of the report, together with the subsequent management and performing of the investigative activities related to it. They will additionally be processed by the competent public authorities (e.g. also judicial) who will process them as independent data controllers. If investigative needs require the possible sharing for the purpose of investigation, analysis, examination, correct evaluation of the report and documentation produced by the Whistleblower with other company functions and/or with external professionals (e.g. consultants, law firms, professional firms, etc.), this takes place in compliance with the Procedure and the Whistleblowing Decree, also exercising the utmost care to protect the confidentiality of the Whistleblower, after obscuring the data and information that could reveal, even indirectly, their identity.

6) PROCESSING METHODS: the data will be processed in compliance with the current regulations, by means of

computerised and manual tools, with logics strictly connected to the purposes indicated above, in order to guarantee the security and confidentiality of the data themselves. In addition, specific technical-organisational measures are adopted,



SIPOL S.p.A.

Via Leonardo Da Vinci, 5 | 27036 Mortara PV | ITALY
Tel +39 0384 295237 | Fax +39 0384 295084
sipol@sipol.com | sipol@pec.sipol.it | www.sipol.com
Cap. Soc. € 600.000 i.v.-R.E.A. PV n. 225329
Reg. Imprese di Pavia PV 01669490037
P.I. IT 01842120188 | C.F. 01669490037



pursuant to art. 32 GDPR, to guarantee the protection of the identity of the Data Subjects, as well as the possible anonymity of the Whistleblower.

7) DATA TRANSFER: the management and storage of personal data will take place on servers located within the European Union.

8) DATA RETENTION: the Data Controller retains and processes personal data for a maximum period of five (5) years from the date of communication of the final outcome of the reporting procedure, except for the establishment of a judicial or disciplinary proceeding following the report itself. In this case, the data will be kept for the entire duration of the procedure until its conclusion and until expiry of the terms of enforceability of the appeal actions, in accordance with the provisions of art. 14, paragraph 1 of Italian Legislative Decree 24/2023 and of art. 5, paragraph 1 of the GDPR.

9) PROVISION OF DATA: the provision of Data for the purposes referred to in point 4) "Purposes of processing and related legal bases" is optional. In particular, with regard to the identification data of the Whistleblower, we remind you of the right to send an anonymous Whistleblowing Report, which will also be taken into account and analysed; with reference to the identity of the reported subject, the provision of their data is similarly optional but, in this case, the Whistleblowing Report may not be taken into consideration to the extent that the minimum necessary information is not available.

10) RIGHTS OF THE DATA SUBJECT: in accordance with arts.15 et seq. of Regulation (EU) 2016/679, the Data Subject may exercise their rights by writing to the Data Controller at the address above or by e-mail to privacy@sipol.com. Pursuant to article 2-undecies of the Privacy Code (in implementation of article 23 of the GDPR), we inform you that the afore-mentioned rights cannot be exercised by Data Subjects (with a request to the Data Controller or with a complaint pursuant to article 77 of the GDPR) if the exercise of these rights may result in an effective and concrete prejudice to the confidentiality of the identity of the Whistleblower.

11) WITHDRAWAL OF CONSENT: with reference to art.7 of the GDPR 2016/679, the Data Subject may revoke the consent given at any time. If you have given your consent to the disclosure of your identity in disciplinary proceedings, you have the right to revoke that consent at any time, without prejudice to the lawfulness of the processing, based on consent, performed before the revocation.

12) RIGHT TO LODGE A COMPLAINT: the Data Subject has the right to lodge a complaint with the Supervisory Authority of the State of residence.

13) AUTOMATED DECISION-MAKING PROCESSES: the data collected by means of electronic/telematic tools will not be subject to automated decision-making processing as specified in art. 22 of the GDPR.