

Before starting the reporting process, please remember:

- References to the identity of the reporter should be removed from the report and its attachments;
- At the end of the reporting path a code will be displayed that only you can see. Thanks to this code you will be able to re-enter the submitted report, read our answers, dialogue with us and attach any other documents. We recommend that you save the code somewhere safe.

INFORMATION ON THE PROCESSING OF PERSONAL DATA pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 IN RESPECT OF "WHISTLEBLOWING" REPORTS.

With this information MAFIN S.r.l. explains how it processes the data collected and what rights are granted to the data subject under Regulation (EU) 2016/679, on the protection of individuals with regard to the processing of personal data and Legislative Decree 196/2003, on the protection of personal data, as amended by Legislative Decree 101/2018.

1. Data controller

The owner of the processing of personal data is MAFIN S.r.l., having its registered office in Via Strada degli Alberi, 7 - 35015 Galliera Veneta (PD).

Pec: mafinsrl@pec.mafin.it;

2. Data protection officer

The contact information of the Data Protection Officer is: MAFIN S.r.l. - Email: mafinsrl@pec.mafin.it

3. Purpose of processing

Personal data are acquired insofar as they are contained in the report and/or in acts and documents attached to it, refer to the reporting party and may also refer to persons indicated as possible perpetrators of the unlawful conduct, as well as those in various capacities involved in the reported events; Therefore, the data you directly provide are processed:

- to collect reports of alleged misconduct of which he or she has become aware by reason of his or her employment, service or supply relationship with the company, will be processed by the company to handle such situations.
- in particular, to carry out the necessary investigative activities aimed at verifying the merits of what has been reported, as well as, if necessary, to take appropriate corrective measures and take appropriate disciplinary and/or judicial action against those responsible for the illegal conduct.

1. Type of data processed

Receipt and handling of reports gives rise to processing of so-called "common" personal data (first name, last name, job role, etc.), as well as may give rise, depending on the content of the reports and the acts and documents attached to them, to processing of so-called "special" personal data (data relating to health conditions, sexual orientation or trade union membership, referred to in Art. 9 GDPR) and personal data relating to criminal convictions and offenses (referred to in Art. 10 GDPR).

2. Legal basis of processing

Taking into account the reference legislation, it should be noted that: - the processing of "common" data is based on the legal obligation to which the Data Controller is subject (Art.

6(1)(c) GDPR); - the processing of "special" data is based on the fulfillment of obligations and the exercise of specific rights of the Data Controller and the Data Subject in the field of labor law (Art. 9(2)(b) GDPR). - the processing of data relating to criminal convictions and offenses, taking into account the provisions of Article 10 GDPR, is based on the legal obligation to which the Data Controller is subject (Art. 6(1)(c), GDPR).

3. Persons authorized to process data

For his or her protection, only the MANAGER, within the MAFIN S.r.l., is able to associate reports with the identities of the reporter, should the reporter choose to provide them. If investigative needs require that other subjects, within MAFIN S.r.l., should be made aware of the content of the report or the documentation attached to it, the identity of the reporter will never be revealed, nor will elements that could, even indirectly, allow the identification of the reporter be revealed. Such persons, since they might still learn of other personal data, are in any case all formally authorized to process and specially instructed and trained to do so, as well as required to maintain the secrecy of what they learn by reason of their duties, without prejudice to the reporting and whistleblowing obligations set forth in Article 331 of the Code of Criminal Procedure.

4. Data processor

MAFIN S.r.l. makes use of OPEN Dot Com Spa, as a technology partner, which is entrusted with the management of the information system of the WHISTLEBLOWING service, designated for this Data Processor in accordance with Article 28 of Regulation (EU) 2016/679.

5. Categories of recipients of personal data

The MANAGER carries out a preliminary investigation of the report. If, as a result of the activity carried out, it finds elements of manifest groundlessness, it orders its dismissal. If, on the other hand, the MANAGER finds that there is a prima facie case for the report, it transmits the report, without the data of the reporter alone, to the internal or external bodies in charge, each according to its competence. His personal data and those of the persons indicated as possible perpetrators of the illegal conduct, as well as persons in various capacities involved in the reported events, will not be disseminated, however, if necessary they may be transmitted to the competent Authority. These subjects are, all of them, autonomous Data Controllers. Further disclosures are prepared for the subsequent stages of the investigation, where necessary to acquire the consent of the data subject.

6. Method of treatment

Personal data will also be processed by automated means for the time strictly necessary to achieve the purposes for which they were collected. MAFIN S.r.l. implements appropriate measures to ensure that the data provided are processed appropriately and in accordance with the purposes for which they are handled; MAFIN S.r.l. employs appropriate security (file encryption), organizational, technical and physical measures to protect the information from alteration, destruction, loss, theft or improper or illegitimate use.

7. Period of data retention

Personal data are retained for a period of 5 years and, in any case, until the settlement of the proceedings initiated by the offices or entities receiving the report. The MANAGER manually provides for the deletion.

8. Nature of data provision and consequences of failure to provide data

In order to activate the measures for the protection of the reporter provided for in the regulations, it is necessary to know the identity of the reporter; however, it is up to the willingness of the reporter to give his or her identification data, even in later stages of the report. In the event that the reporter still wishes to proceed with anonymous reporting, the

latter will be handled in different ways; such a report will be taken into consideration only where adequately substantiated, rendered with a wealth of details and thus capable of bringing out facts and situations by relating them to specific contexts. The procedure thus guarantees anonymity and confidentiality in the handling of the report. Protection will be guaranteed as per Art. 16 paragraph 4, Legislative Decree 24/2023. We point out that if the name is not provided, it may be requested later by the manager of the report through this platform. Therefore, we remind you to carefully keep the key code provided at the end of saving. Instead, it is left to each reporter to decide what further personal data to provide. The more details in the report, the greater the possibilities for the MAFIN S.r.l. to intervene.

#### 9. Rights

The interested party, subject to legal reservations, has the right, at any time, to obtain confirmation of the existence or non-existence of the data provided. He/she also has the right to request, in the forms provided for by law, the rectification of inaccurate personal data and the integration of incomplete data and to exercise any other right under Articles 18 to 22 of the Regulations where applicable. These rights may be exercised with a request addressed to: MAFIN S.r.l., Via Strada degli Alberi, 7 - 35015 Galliera Veneta (PD) - email address: [whistleblowing@mafin.it](mailto:whistleblowing@mafin.it). If you believe that the processing has been carried out in a manner that does not comply with the Regulations and Legislative Decree 196/2003, you may apply to the Guarantor for the Protection of Personal Data, pursuant to Article 77 of the same Regulations. Further information regarding your rights on the protection of personal data can be found on the website of the Guarantor for the Protection of Personal Data at [www.garanteprivacy.it](http://www.garanteprivacy.it).