

PRIVACY - REPORTED PERSON (WHISTLEBLOWING – Italian legislative decree No. 24/2023)

This Whistleblowing Policy and Procedure is drafted pursuant to and for the purposes of art. 14 of EU General Data Protection Regulation 2016/679 (GDPR)

	WHY ARE WE PROVIDING YOU WITH THIS INFORMATION? 1.WHO IS THE DATA CONTROLLER? HOW CAN YOU CONTACT THE DATA CONTROLLER? STELIAU TECHNOLOGY ITALY S.p.A. is the Data Controller, with registered office in Viale Sarca n. 336 – ED.13 , 20126, Milano, in the person of its CEO. You can contact him for any information via e-mail to privacy@stelieu.it
	2. TYPE OF DATA THAT CAN BE PROCESSED Pursuant to Article 4 GDPR, “personal data” means: any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (C26, C27, C30). The data processed will be those related to the reports made by the reporting subjects (so-called Whistleblowers), which may include data related to third parties, as the reported subjects, and will be processed in full compliance with and in the manner defined in the Whistleblowing Procedure adopted by the Data Controller. Data related to the whistleblowers, which may be provided, could be: - Name and surname or other information enabling identification of the person to whom the reported facts may be ascribed; - Position in the company - Other personal data such as telephone number, e-mail address, tax code; - Any additional information provided by the whistleblower. - Any Special Data (see Art. 9 GDPR): personal data capable of revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health or sex life or sexual orientation. - Any Data relating to Criminal Convictions and Offenses or Related Security Measures (see Article 10 GDPR): personal data suitable for revealing measures referred to in Article 3, paragraph 1, letters from a) to o) and from r) to u), of Presidential Decree No. 313 of November 14, 2002, concerning the criminal records, the registry of administrative penalties dependent on crime and related pending charges, or the status of defendant or suspected person under Articles 60 and 61 of the Code of Criminal Procedure. The data subjects of this processing are: i) Reported person: the natural or legal person mentioned in the internal report as the person to whom the violation is attributed or as a person otherwise involved in the reported violation (Article 2, paragraph 1, lett. l), of Italian Legislative Decree no. 24/2023); as well as natural persons in various capacities involved in the reported events: ii) Facilitator: the natural person who assists the whistleblower in the reporting process, operating within the same work context and whose assistance must be kept confidential; iii) Person informed about the facts.

3. PURPOSE OF PROCESSING, LAWFULNESS OF PROCESSING, DATA RETENTION PERIOD, SOURCE OF INFORMATION

 PURPOSES OF DATA PROCESSING	 LAWFULNESS OF PROCESSING	 DATA RETENTION PERIOD	 SOURCE OF INFORMATION
A) Management of whistleblowing reports. In particular, use of your personal data collected as a result of the submission of reports against you	The processing is necessary for compliance with a legal obligation to	For the time strictly necessary to process the whistleblowing report and, in any	The source of the personal data is the report made by the whistleblower (Art. 3(3) and (4) of Italian Legislative

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regarding conduct, acts or omissions that harm the public interest or the integrity of the public administration or private entity, pursuant to Article 2, Paragraph 1 letter a) of Italian Legislative Decree No. 24/2023	which the Data Controller is subject to. (pursuant to Italian Legislative Decree No. 24/2023 and Recital 45 GDPR) Art. 6 par. 1 letter 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, para. 2, letter b, GDPR). The processing of data relating to criminal convictions and offenses, considering the provisions of Article 10 GDPR, is based on the legal obligation to which the Data Controller is subject (Art. 6 para. 1, letter c).	case, no longer than 5 years from the date of the communication of the final outcome of the whistleblowing procedure (Art. 14 of Italian Legislative Decree No. 24/2023). In the event of a lawsuit, the above-mentioned time limit is extended until conclusion of the stages of legal proceedings. Personal data that are clearly not useful for processing a specific whistleblowing report are not collected or, if accidentally collected, are deleted immediately.	Decree No. 24/2023) and by other parties during the investigation.

	4. TO WHICH RECIPIENTS OR CATEGORIES OF RECIPIENTS WILL PERSONAL DATA BE DISCLOSED? DATA RECIPIENTS Personal data will not be disclosed. Personal data will be communicated to subjects who will process the personal data as independent Data Controllers (article 28 GDPR) and/or processed by individuals (article 29 GDPR), acting under the authority of the Data Controller for the processing of the above-mentioned purposes. The data will be disclosed to recipients belonging to the following categories: - the external party (the Supervisory Body to whom the management of the internal reporting channel is delegated; ; - third parties for the provision of the whistleblowing platform adopted by the Data Controller; - Judicial and public authorities (including ANAC).
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	5. IS THERE A TRANSFER OF PERSONAL DATA TO A COUNTRY OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)? Personal data will not be transferred to countries outside the EEA.
	6. IS THERE ANY AUTOMATED DATA PROCESSING? Personal data will undergo traditional manual, electronic and automated processing. It is specified that no fully automated decision-making processes are carried out.
	7. RIGHTS OF THE DATA SUBJECTS Data subjects shall be able to exercise their rights under Articles 15 et seq. GDPR, by contacting the Recipient of reports, through the whistleblowing channel, or at the contacts above-mentioned. Data subjects shall have the right to obtain from the Data Controller, at any moment, rectification (Art. 16) of inaccurate personal data concerning them and access to your personal data (Art. 15). These rights may not be exercised if this would result in actual and concrete prejudice to the confidentiality of the identity of the person reporting violations of which he/she has become aware by reason of his/her employment relationship or duties, in compliance with Italian Legislative Decree No. 24/2023 (Art. 2-undecies of Italian Legislative Decree No. 196/2003, as amended by Art. 24(4) of Italian Legislative Decree No. 24/2023). In the event that the data subject considers that the processing of personal data is carried out by the Data Controller in violation of the provisions of Regulation (EU) 2016/679, the data subject has the right to lodge a complaint with the Italian Data Protection Authority, in particular in the Member State where he/she normally resides or works or in the place where the alleged violation of the regulation occurred (Privacy DPA https://www.garanteprivacy.it/), or to take appropriate legal action.
	8. AMENDMENTS TO THIS WHISTLEBLOWING POLICY AND PROCEDURE The Data Controller reserves the right to amend, update, add or remove parts of this Whistleblowing Policy and Procedure. In order to facilitate this review, the policy will contain an indication of the date on which it was updated.

Date of last updates: 20th February 2024

The Data Controller

STELIAU TECHNOLOGY ITALY SPA

Pursuant to Articles 14 and 6 of the EU Regulation 2016/679 (GDPR)

I, the undersigned _____ city of residence _____

I declare that I have read the information for the processing of personal data for the purpose A)

Date _____ signature for acknowledgement _____