

PRIVACY INFORMATION NOTICE REPORTING PERSON (SO CALLED WHISTLEBLOWER)
(Italian Legislative Decree No. 24/2023)

This Privacy Information Notice is drafted pursuant to Article 13 of the Regulation (UE) 2016/679 (here and after "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, Postal Code 20126, Milano, in the person of its CEO. You can contact him for any information at the following e-mail address: privacy@steliau.it
	2. TYPE OF DATA THAT CAN BE PROCESSED AND DATA SUBJECTS 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; - Position in the Company; - The voice of the Reporting person/whistleblower, in the case of a request for a face-to-face meeting and prior consent to registration; - Other information provided by the Reporting person/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) employees of private-sector entities; (ii) self-employed people; (iii) workers or collaborators providing goods or services or carrying out works for third parties; (iv) freelancers and professional consultants; (v) apprentices and trainees; (vi) shareholders and persons with administrative, management, control, supervisory or representative functions; (vii) job applicants; and (viii) terminated employees.

3. PURPOSES OF THE PROCESSING, LAWFULNESS OF PROCESSING, DATA RETENTION PERIOD, NATURE OF DATA PROVISION

	 PURPOSES OF PROCESSING	 LAWFULNESS OF PROCESSING	 DATA RETENTION PERIOD	 NATURE OF DATA PROVISION
A)	Management of whistleblowing reports. In particular, collection of data discovered in the context of a legal relationship, pursuant to Article 3 of Legislative Decree No. 24/2023, for the submission of reports	Data processing is necessary for compliance with a legal obligation to 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).	For the time strictly necessary for the processing of the report and, in any case, no longer than 5 years from the date of the communication of the final outcome of the reporting procedure (Article 14 of Italian Legislative Decree No. 24/2023). If a lawsuit is filed, the aforementioned period shall be extended until the conclusion of all stages of the legal proceedings. Personal data that are manifestly not useful for the processing of a specific report shall not be collected or, if accidentally collected, shall be deleted immediately.	The provision of the Reporting person/Whistleblower personal data is necessary, without prejudice to the right to report anonymously.
B)	Disclosure of the identity of the Reporting person/whistleblower and/or any other information from which such identity may be inferred, directly or indirectly, to persons other than those competent to receive and follow up on the report, pursuant to Article 12, paragraph 2, of the Italian Legislative Decree No. 24/2023.	The processing is based on the data subject's express consent to the processing of his/her personal data (Recital 42 and 43). Consent for the potential disclosure of the data subject's identity will be requested by the Reporting Manager at	Until withdrawal of consent and unless the identity had already been disclosed to a third party.	The provision of the Reporting person/whistleblower's personal data is optional. In the event of non-provision, the Data Controller may not disclose the identity of the Reporting person/whistleblower and/or any other information from which such identity may be inferred to persons other

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	a time after receiving the report, if necessary. (Art. 6, para. 1, letter a, GDPR).		than those competent to receive and follow up on reports, except for the cases expressly provided for in Italian Legislative Decree No. 24/2023 and subject to prior written notice of the reasons for the disclosure.

	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 Autonomous Data Controllers (article 28 GDPR) and/or processed by natural persons (article 29 GDPR), operating 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 the Italian National Anti-Corruption Authority “so called ANAC”).
	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 AN AUTOMATED DATA PROCESSING? Personal data will be subject to traditional manual, electronic and automated processing. Please note that no fully automated decision-making processes are carried out.
	7. DATA SUBJECT RIGHTS Data subjects shall be able to exercise their rights under Articles. 15 and et seq. GDPR directly through the whistleblowing channel ParrotWB or at the above-mentioned contact details. Data Subject have the right, at any time, to request access to your personal data (Article 15), rectification (Article 16), erasure of such data (Article 17) and restriction of processing (Article 18). The Data Controller shall communicate to each recipient to whom the personal data have been disclosed any rectifications, erasures, or restrictions of processing (Article 19). The Data Controller shall notify the data subjects about these recipients, if the data subject so requests. In cases provided for by Article 20, the Data Controller ensures the right to data portability. In specific cases, you have the right to data portability (Article 20), and in such cases, your data will be provided in a structured, commonly used, and machine-readable format. Where the legal basis is consent, you have the right to withdraw your consent without affecting the lawfulness of the processing based on consent before its withdrawal. In the event that Data Subjects consider that the processing of their personal data carried out by the Data Controller is in breach of the provisions of Regulation (EU) 2016/679, they shall have the right to lodge a complaint with the Data Protection Authority, particularly in the Member State in which they are habitually resident or work, or where the alleged violation of the regulation occurred (Italian Privacy Authority https://www.garanteprivacy.it/), or to take appropriate legal action. Please note that, pursuant to Italian Legislative Decree No. 24/2023, the Data Controller shall guarantee

	the confidentiality of the Reporting person/whistleblower: The identity of the Reporting person/whistleblower and any other information from which that identity may be inferred, directly or indirectly, shall not be disclosed, without the express consent of the Reporting person/whistleblower, to persons other than those competent to receive or follow up the report, without prejudice to the right of defence of the Reported person and where required by law.
	8. AMENDMENTS TO THE PRIVACY INFORMATION NOTICE 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 S.p.A.