

**INFORMATION NOTICE ON PROCESSING OF PERSONAL DATA PURSUANT TO ARTT. 13  
AND 14 OF THE EUROPEAN REGULATION 2016/679 ("REGULATION") –  
WHISTLEBLOWING**

**Itema S.p.A., Lamiflex S.p.A., Schoch & Co S.r.l. and Itemalab S.r.l.** wishes to inform you of the processing of personal data carried out resulting from the system adopted by the companies to collect reports of unlawful conducts or violations of the model of organization, management and control pursuant to Legislative Decree no. 231/2001.

### **1. Identity and contact details of the data controller**

The Data Controllers are respectively:

- Itema S.p.A., with registered office at via Cav. G. Radici 4, Colzate (BG), e-mail [privacy@itemagroup.com](mailto:privacy@itemagroup.com) with regard to alerts concerning the same;
- Lamiflex S.p.A., with registered office at via E. De Angeli, 51, 30, 28 24028 Ponte Nossa (BG), e-mail [privacy@itemagroup.com](mailto:privacy@itemagroup.com) with regard to alerts concerning the same;
- Schoch & Co S.r.l., with registered office at via cav. Gianni Radici 4 Colzate (BG), e-mail [privacy@itemagroup.com](mailto:privacy@itemagroup.com) with regard to alerts concerning the same;
- Itemalab S.r.l., with registered office at via cav. Gianni Radici 4 Colzate (BG), e-mail [privacy@itemagroup.com](mailto:privacy@itemagroup.com) with regard to alerts concerning the same

(hereinafter “**Companies**” and individually “**Company**”).

### **2. Categories of personal data**

The Companies allows the detailed reporting of unlawful conducts or violations of the organisation and management model adopted pursuant to Legislative Decree no. 231/2001 (hereinafter, the “**Organisation, Management and Control Model**”) to be made in the manner provided for in the Organisation, Management and Control Model itself and in the Regulation of the Supervisory Committee (hereinafter, the “**SC**”).

In addition to the personal data of the whistleblower (such as personal details and contact details), the report may also contain the personal data of the reported subjects and/or of third parties.

The data processed by the Companies (hereinafter, “**Data**”) are the following:

#### **2.1 Common Data**

Persona data of “common” nature, such as identification and contact data.

#### **2.2 Special categories of personal data**

Health data (e.g. accidents and work-related illness).

#### **2.3 Data relating to criminal convictions and offences**

Data related to criminal offences.

### **3. Source of Data**

The Data are provided directly by the data whistleblower itself (and then collected by the Companies from the data subject pursuant to Article 13 of the Regulation); Data of reported subjects and/or of third parties are provided by the whistleblower (and therefore collected by the Companies from the data subject pursuant to Article 14 of the Regulation).

### **4. Purposes and legal basis of the data processing and period of retention of the Data**

The personal data indicated above are processed for the following purposes, on the basis of the following lawful basis and for the period indicated below:

<b>Purposes</b>	<b>Legal Basis</b>	<b>Retention period</b>
Management of reports of unlawful conducts or violations of the Organisation, Management and Control Model adopted by the Companies pursuant to Legislative Decree no. 231/2001 and the Code of Ethics.	The legitimate interest of the data controller. With regard to special categories of data, fulfilment of a legal obligation pursuant to Article 9 (b) of the Regulation. With regard to data relating to criminal convictions and offences,	2 months after the completion of all activities following the establishment of the facts set out in the report, if the report does not lead to the initiation of litigation or disciplinary proceedings against the reported person or the whistleblower. In such a case, the Data will be kept for the entire duration of the litigation or

If necessary, to ascertain, exercise and/or defend the rights of the data controller in a judicial proceeding.	fulfilment of a legal obligation pursuant to Article 6 of Legislative Decree no. 231/2001, as amended by Law no. 179/2017.	until the time limit for appeals has been exhausted.
After the expiry of the aforementioned retention periods, the Data will be destroyed or made anonymous, according to the technical procedures of deletion and backup.		

## 5. Nature of the Data provision and methods of processing

The provision of the Data of the whistleblower and reported subjects is voluntary.

The Data will be processed by the Companies by both digital and paper means and in compliance with the principles set forth in the Regulation and protected by adequate technical and organisational measures in order to guarantee their integrity and confidentiality.

## 6. Recipients of Data

The Data may be communicated to judicial authorities and other public entities entitled to receive them, while respecting the confidentiality of the data subjects.

The Data may be processed, on behalf of the Companies, by third parties, appointed as data processors who provide the Companies with services instrumental to the purposes indicated in this privacy notice.

The Data may be processed by SC's members, expressly authorized to their processing, who received and managed the whistleblowing notification according to the Organisation, Management and Control Model.

Furthermore, the Data are processed by the Companies' employees belonging to corporate functions assigned to the pursuit of the aforementioned purposes, who have been expressly authorised to the processing and have received adequate operating instructions.

## 7. Data subject's rights

You may exercise, in relation to the data processing described herein, the rights provided for by the Regulation, including the right to:

- receive confirmation of the existence of the processing of your personal data and access the data (rights of access);
- update, amend and/or complete your personal data (right of rectification);
- request the deletion of your data in the cases provided for by Article 17 of the Regulation (right to be forgotten);
- obtain the limitation of the data processed in the cases provided for by Article 18 of the Regulation (right to restriction of processing);
- object at any time, easily and free of charge, for reasons related to your particular situation, to the processing of data carried out on the basis of the legitimate interest of the controller (right to object);
- to receive the data in a structured, commonly used and machine-readable format, as well as, if technically feasible, to transmit them to another data controller without hindrance, where the processing is based on consent or contract and is carried out by automated means (right to data portability).

To exercise these rights, you may contact the Companies at any time, sending your request by email to the following address [privacy@itemagroup.com](mailto:privacy@itemagroup.com) or by registered letter with return receipt to the Data Protection Committee – Itema SpA\_ Via. Cav Gianni Radici, 4 – 24020 Colzate (BG).

Pursuant to Article 2 undecies of Legislative Decree no. 196/2003, as amended by Legislative Decree No. 101/2018 (hereinafter, the “**Code**”), the rights referred to in Articles 15 to 22 of the Regulations may not be exercised if the exercise of such rights may result in actual and concrete prejudice to the confidentiality of the identity of the employee who reports unlawful conduct, pursuant to Law no. 179/2017, of which he or she has become aware by reason of his office.

In such a case, the rights in question may be exercised through the Privacy Supervisory Authority (in the manner set out in Article 160 of the Code), who shall inform the data subject that it has carried out all the necessary control activities or has conducted a review, as well as of the data subject's right to lodge a judicial appeal.

You have the right to lodge a complaint with the Italian Supervisory Authority or, in any case, with the competent supervisory authority in the Member State in which you normally reside or work or in the State in which the alleged violation occurred.