

INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 AND 14 OF REGULATION (EU) 2016/679 ("REGULATION") - WHISTLEBLOWING

Itama S.p.A., Lamiflex S.p.A., Schoch & Co S.r.l. and Itemalab S.r.l. (hereinafter, "**companies of the Itama group**") wish to inform you about the processing of personal data deriving from the system adopted by the companies to collect and process reports concerning information on violations, including well-founded suspicions, of national or European Union regulatory provisions, which harm the public interest or the integrity of the public administration or private entity, committed within the organization of one of the companies of the Itama Group and of which subjects have become aware in the context of their working context with these companies.

1. Identity and contact details of the controller

The Data Controller is Itama S.p.A., with registered office in via Cav. G. Radici 4, 24020 Colzate (BG), e-mail privacy@itemagroup.com (hereinafter, the "**Company**").

The Data Controller is supported by the following companies:

- Lamiflex S.p.A., with registered office in via E. De Angeli, 51, 24028 Ponte Nossa (BG), e-mail privacy@itemagroup.com with reference to reports concerning the same;
- Schoch & Co S.r.l., with registered office in via cav. Gianni Radici 4, 24020 Colzate (BG), e-mail privacy@itemagroup.com with reference to reports concerning the same;
- Itemalab S.r.l., with registered office in via cav. Gianni Radici 4, 24020 Colzate (BG), e-mail privacy@itemagroup.com with reference to reports concerning the same.

acting as Joint Data Controllers, meaning "two or more companies that jointly determine the purposes and means of processing", as provided for in Article 26 of the Regulation.

The joint controllership agreement concluded between the Company and the Joint Controllers is made available at the request of the data subject.

2. Categories of personal data

The personal data processed (e.g. name, surname, company role, etc.), including those belonging to particular categories of data pursuant to Article 9 of the GDPR and relating to criminal convictions and offences pursuant to Article 10 of the GDPR, which may be contained in the report and in acts and documents attached to it, may concern the whistleblower, the persons indicated as possible persons responsible for the unlawful conduct or those involved in various capacities in the events reported (hereinafter jointly referred to as "**Personal Data**")." or just "**Data**").

3. Source of Data

The whistleblower's Data are provided directly by the whistleblower himself (and therefore acquired by the Companies from the data subject pursuant to Article 13 of the Regulation); the Data of the persons indicated as possible responsible for the unlawful conduct or those involved in various capacities in the events reported are provided by the whistleblower (and therefore acquired by the Companies from third parties pursuant to Article 14 of the Regulation).

4. Purpose and legal basis of the processing and period of data retention

The above-mentioned Data are processed for the following purposes, on the basis of the following conditions of lawfulness and for the period indicated below:

Purpose of the processing	Legal basis of the processing	Data retention period
Ensure compliance with the provisions of Legislative Decree 24/2023.	<ul style="list-style-type: none">• Legal obligation required by the provisions of Legislative Decree 24/2023, pursuant to art. 6, par. 1 letter c) of the Regulation and taking into account the provisions of art. 10 of the Regulation;• Fulfilment of obligations and the exercise of specific rights in the field of labour law pursuant to Article 9, paragraph 2, letter b) of the Regulation;• Legitimate interest in the management of the reports	For the time necessary to process the specific report and in any case no later than 5 (five) years from the date of communication of the final outcome of the reporting procedure.
Pursue the legitimate interest in managing the reports received through this reporting channel and, if necessary, in ascertaining, exercising or defending a right, including in court, on the part of		

the Itema group company involved.	received, as provided for pursuant to art. 6, par. 1 letter f) of the Regulation; ascertain, exercise or defend a right in court pursuant to art. 9, par. 2 letter f) of the Regulation.	
After the expiry of the storage terms indicated above, the Data will be destroyed or made anonymous, compatibly with the technical procedures of deletion and backup. In any case, the Data that are manifestly not useful for the processing of a specific report, due to the absolute irrelevance of the same with respect to the reported event, will not be collected or, if collected accidentally, will be deleted without delay, without prejudice to the sector regulations on the retention of records.		

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

The provision of Data is necessary in order to manage and follow up on reports, as required by the provisions indicated in Legislative Decree 24/2023.

In the case of anonymous reporting, it will be taken over only if the circumstances of time and place in which the reported event occurred, the description of the fact and the personal details or other elements that allow the identification of the person to whom the reported facts are attributed are clear.

The Data will be processed by the Data Controller, the Joint Data Controllers and expressly designated subjects, with the aid of IT tools and in compliance with the principles set out in the Regulation, in order to guarantee their integrity and the confidentiality of the data subjects and their rights through the adoption of appropriate technical and organizational measures to ensure a level of security appropriate to the risk.

6. Recipients of the Data

The Data will not be communicated to parties other than those competent to receive or follow up on reports received from the companies of the Itema Group.

Specifically, the Personal Data will be processed by personnel authorized by the companies of the Itema Group and in this sense instructed through adequate and specific professional training aimed at increasing their specialized skills also in the field of legislation on the protection of personal data, data and information security, as well as in terms of training in relation to the procedures prepared by the companies.

The Data may be processed, on behalf of the companies of the Itema Group, by third parties, designated as data processors who provide the companies with services or services instrumental to the purposes indicated in this policy.

Personal Data will not be transferred to non-EU countries and in any case disseminated.

7. Rights of the data subject

You may exercise, in relation to the processing of Data described therein, the rights provided for by the Regulation, including the right to:

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

To exercise these rights, you can contact the companies of the Itema Group at any time, sending your request by email to the following privacy@itemagroup.com address or by registered mail with return receipt to the address Comitato Data Protection - c/o Itema SpA – Via Cav. Gianni Radici 4, 24020 Colzate (BG). From receipt of the request, the Data Controller or the Joint Controller has one month to take all the necessary actions. The one-month deadline may be extended by two months in the case of a complex request or numerous requests.

You have the right to lodge a complaint with the Data Protection Authority, in the manner and terms set out on the website of the Data Protection Authority (<http://www.garanteprivacy.it>), or in any case with the competent supervisory authority in the Member State in which you habitually reside or work or in the State in which the alleged violation occurred.

However, the reported person or the person mentioned in the report, with reference to his or her Data processed in the context of the report, may not exercise – for the time and to the extent that this constitutes a necessary and proportionate measure – the rights listed above, as the exercise of these rights could result in an actual and concrete prejudice to the protection of the confidentiality of the identity of the whistleblower; therefore, the reported person or the person mentioned in the report is also precluded from the possibility, if they believe that the processing concerning them violates the aforementioned rights, to contact the Data Controller or the Joint Controllers and, in the absence of a response from the latter, to lodge a complaint with the Data Protection Authority.

8. Updates and changes

The Data Controller may modify, supplement or simply update, in whole or in part, this privacy policy provided pursuant to Articles 13 and 14 of the Regulation, also in consideration of regulatory changes or the entry into force of new sector regulations.

Updates and changes will be communicated through the publication of the new information in this reporting channel. Therefore, please access this section regularly to check the publication of the most recent and updated privacy policy.

Privacy policy updated on 24/01/2024