



## PERSONAL DATA PROCESSING NOTICE within the Company's whistleblowing reporting system

### 1. DATA CONTROLLER.

At any time, you may contact **FILA INDUSTRIA CHIMICA S.P.A.** (hereinafter referred to as "FILA S.p.A."), VAT number IT00229240288, located in via Garibaldi no. 58, 35018 - San Martino di Lupari, Padua - Italy, the "Data Controller", at the email address [privacy@filasolutions.com](mailto:privacy@filasolutions.com) for information and/or to report any issues.

### 2. CATEGORIES OF PERSONAL DATA PROCESSED

Within the scope of the reporting acquisition and management process, personal data of the reporting party, of the reported party and of other categories of individuals concerned, such as individuals involved and/or related to the reporting process and/or the matters subject to the same report, will be processed.

Such information may include **common personal data** (e.g., personal data, contact details, data related to the work activity of the Data Subject, other data contained in the report and/or attached or collected during the reporting process management, etc.) and, to the extent strictly necessary for the pursuit of the processing purpose described below, personal data belonging to **special categories** as referred to in Article 9 of the GDPR (e.g., health data, union membership, data suitable to reveal racial origin, political opinions, religious or philosophical beliefs of the Data Subject, etc.) or data relating to **criminal convictions and offenses** as referred to in Article 10 of the GDPR.

### 3. DATA SOURCE

Personal data will be collected directly from the Data Subject or from third parties, through the report made using the tools made available by the Company, or acquired during the reporting process management.

### 4. PURPOSE OF PROCESSING, LEGAL BASIS, AND RETENTION PERIOD

Personal data will be processed for the following purposes and in compliance with the legal bases as specified below. In particular:

**A)** for the management of the report and the adoption of consequent measures in compliance with the provisions of the European Directive 23/10/2019 No. 193 and National implementing legislation: Italian Legislative Decree 10/05/2023 No. 24. In this case, the **legal basis** for the personal data processing is the necessity to comply with the obligations imposed by the legislation on whistleblowing (Article 6, paragraph 1, letter c), Article 9, paragraph 2, letter b), as well as Article 10 of the GDPR).

If it is necessary to disclose the identity of the reporter to subjects other than those managing the reporting procedure, the data controller will request the express and specific **consent** of the reporter.

Personal data will be processed for the time strictly necessary and will be kept for a period not exceeding 5 years. After this period, the data will be destroyed, deleted, or anonymized, compatibly with the technical deletion and backup procedures.

### 5. DATA PROVISION.

The provision of data must be understood as **obligatory** to follow up on any reports received and to pursue the purposes as identified above. Refusal to provide data prevents the establishment or continuation of the employment relationship.

### 6. DATA PROCESSING METHODS. CATEGORIES OF SUBJECTS TO WHOM DATA MAY BE DISCLOSED OR WHO MAY BECOME AWARE OF IT AS EXTERNAL PROCESSORS, AUTHORIZED SUBJECTS AND AUTONOMOUS CONTROLLERS

Profiling is **excluded**, and data will not be disclosed.

For the pursuit of the purposes indicated above, the Data Controller may **communicate and have personal data processed**, within the national scope, by third parties with whom it has relationships, namely:

- a) the **subjects authorized to process** are the subjects responsible for the disciplinary proceedings, if

- applicable and actionable;
- b) The personal data may be processed, on behalf of the Data Controller, by subjects designated as **Data Processors**, including the Reporting Manager or consultants who provide for consultancy or assistance of any kind to the Data Controller;
  - c) The personal data may be communicated to subjects acting as **Data Controllers**, including the National Anti-Corruption Authority, the Judicial Authority, the Court of Auditors, and any other involved public authorities.

## 7. TRANSFER OF DATA OUTSIDE THE EU.

Personal data will not be transferred to countries outside the European Union.

## 8. RIGHTS OF THE DATA SUBJECT.

Please note that you have the right to exercise the rights established by Articles 15 to 22 of EU Regulation 2016/679, which consist of the following prerogatives:

- a) the right to obtain **confirmation as to whether or not personal data concerning you are being processed** and, if so, to **obtain access** to the personal data and the information referred to in Article 15, concerning the purpose of the processing, the categories of personal data concerned, the recipients to whom the data have been or will be disclosed; the period of data retention; the right to know the existence of automated decision-making;
- b) the right to obtain the **rectification** of inaccurate personal data concerning you without undue delay. Considering the purposes of the processing, you have the right to have incomplete personal data completed, including by providing a supplementary statement;
- c) the right to obtain the **erasure** of personal data concerning you without undue delay;
- d) the right to obtain the **restriction** of processing in case of dispute regarding the accuracy of the data, unlawful processing, interest in the processing for the establishment, exercise, or defense of a legal claim, opposition to processing pending verification of the possible prevalence of the legitimate grounds of the data controller over those of the Data Subject;
- e) to be informed in case of **rectification or erasure** of personal data or restriction of processing carried out in accordance with Article 16, Article 17, paragraph 1, and Article 18 of EU Regulation 2016/679, unless this proves impossible or involves a disproportionate effort;
- f) the right to data **portability** concerning you, if applicable;
- g) the right to **object** at any time, for reasons related to your particular situation, to the processing of personal data concerning you pursuant to Article 6, paragraph 1, letter f);
- h) the right to **lodge a complaint** with a supervisory authority, if the data are not collected from the Data Subject.

The complete list of Data Subject rights is available on [www.garanteprivacy.it](http://www.garanteprivacy.it).

Please be informed that, according to the aforementioned art. 2-undecies of Italian Legislative Decree 196/2003, the aforementioned rights cannot be exercised when the exercise of such rights may result in an actual and concrete prejudice to the confidentiality of the reporter's identity also in compliance with Italian Legislative Decree 24/2023. In this case, the exercise of rights will be carried out in accordance with the applicable law or data protection regulation, also through requests for specific assessments to the Supervisory Authority pursuant to Article 160 of Italian Legislative Decree 196/2003.

## 9. EXERCISE OF DATA SUBJECT RIGHTS.

You have the right to exercise the above rights at any time by sending an email to the Data Controller, with the subject "**REF. PRIVACY**", at the email address indicated in paragraph 1.

Fila Industria Chimica S.p.A.