

## **Whistleblower Privacy Policy.**

Information on the processing of personal data pursuant to Article 13 of Regulation (EU) 2016/679 GDPR  
WHISTLEBLOWING Procedure

Dear Whistleblower,

the Company Belotti S.p.A. thanks you for choosing to make a whistleblowing report.

Your privacy is important to us and we want to assure you that your personal data will be treated in accordance with applicable privacy laws.

This Privacy Policy provides information on how we collect and use your personal data during this procedure. We ask you to read it carefully before providing any information because transparency and fairness towards those who report facts and/or conduct potentially relating to anti-corruption legislation is a fundamental part of our company.

## **Data Controller and Data Protection Officer**

The Data Controller is Belotti S.p.A., located at Via San Giovanni Bosco, 12 - 24040 Suisio (BG) (hereinafter Belotti S.p.A.).

For information regarding your personal data, please call +39 0354934411 or write an email to [belotti@belotti.com](mailto:belotti@belotti.com).

The Data Protection Officer, if appointed, can be contacted at the following e-mail address: [belotti@belotti.com](mailto:belotti@belotti.com)

## **Types of Personal Data Collected**

During the whistleblowing procedure, subject to your consent, we may collect the following types of personal data

- first name, last name and contact information (e.g. email address or telephone number), only if disclosed by the whistleblower;
- information about the facts and circumstances that are the subject of the whistleblowing report.

## **Purpose of processing**

Personal data is processed by Belotti S.p.A. in the performance of its related activities. Personal data will be processed by means of computerised and other tools, for the following purposes:

- managing the technical activities of the computerised reporting platform in the event that it is preferred to use this reporting mode;
- allow access to the whistleblowing reporting platform;
- evaluate and search for elements relating to the whistleblowing report submitted;
- maintain anonymity;
- communicate any updates on the report or request further information;
- comply with legal and regulatory obligations to which Belotti S.p.A. is subject;
- comply with any other obligation strictly related to current legislation on whistleblowing and prevention of corruption.

## **Legal Basis for Processing**

The processing of personal data is carried out on the basis of the following legal bases:

- legitimate interest in:
  - detecting possible violations of internal rules or administrative procedures;
  - identifying and preventing situations of risk or potential damage in a timely manner;
  - initiating internal or external procedures for verifying the validity of whistleblowing reports and taking appropriate action;
  - demonstrate this Administration's compliance with the rules of transparency and accountability;
- compliance with legal obligations to which Belotti S.p.A. is subject.

## **Sharing of Personal Data**

Personal data collected during the whistleblowing procedure may be shared with the following categories of recipients

- Employees adequately trained, authorised and appointed by Belotti S.p.A., in order to assess and collect more information about the whistleblowing;
- External parties adequately identified and trained, authorised and appointed by Belotti S.p.A., to assess and collect more elements on the report;
- Competent authorities, if required by applicable laws;
- other third parties, if required to protect the rights and legitimate interests of Belotti S.p.A.

Should an in-person meeting arise in the course of the investigation necessary to handle reports, the Belotti S.p.A. personnel involved have been formally appointed to carry out this activity and have received appropriate training to carry it out. All reports, however made, are archived in the dedicated IT platform.

Personal data may also be managed through online software or cloud services, located within the European Union, in compliance

# Belotti S.p.A.

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with the rights and guarantees provided by the EU General Data Protection Regulation 2016/679 (GDPR). The complete and updated list of any Data Processors is always available upon request at the following e-mail address: [belotti@belotti.com](mailto:belotti@belotti.com).

## **Transfer of Data outside the European Economic Area (EEA)**

As mentioned above, personal data is processed exclusively within the European Economic Area, thus ensuring compliance with the privacy and data protection regulations set out in the GDPR.

In particular cases, should the reporting of potential misconduct, which is the subject of the whistleblowing procedure, require activities outside the European Economic Area (EEA), the personal data collected may be transferred to, and processed in, countries outside the EEA. Belotti S.p.A. is committed to ensuring that such transfers are made in accordance with applicable privacy laws and that adequate data protection and whistleblower protection measures are implemented in accordance with the privacy and security standards that are currently deemed appropriate.

## **Data retention time**

Personal data will be stored for a period appropriate to the purposes of processing as stated above and in compliance with all legal obligations.

## **Rights of the data subject**

The data subject may exercise his or her rights at any time, and in particular access his or her personal data, request that it be corrected or limited, updated if incomplete or erroneous, and deleted if collected in violation of the law, as well as object to its processing, subject to the existence of legitimate reasons on the part of the Data Controller. You also have the right to portability, i.e. to receive your personal data in a structured, commonly used and machine-readable format.

To this end, you can contact the Data Controller or the Data Protection Officer.

You may lodge a complaint with the Italian Data Protection Authority - Garante per la protezione dei dati personali - Piazza Venezia n. 11 - 00187 Roma

For further information, please send a request to the e-mail address: [belotti@belotti.com](mailto:belotti@belotti.com).

In the event that the report is not made by a specifically identifiable person, it shall be treated, as provided for by Legislative Decree 24 of 10/03/2023 and the subsequent ANAC Guidelines, as an anonymous report and shall not benefit from the protections guaranteed by the whistleblowing procedure, but shall in any case be examined in accordance with the inspection procedures in force at Belotti S.p.A., in order to verify the existence of the offences described. As provided for in the above-mentioned ANAC Guidelines, even in the case of anonymous whistleblowing, the protections guaranteed to the whistleblower under a whistleblowing procedure will be ensured in the event that "retaliatory" measures are put in place.

This privacy policy may be subject to changes or updates in the event that the relevant regulatory framework or ANAC guidelines change in the future. We therefore invite you to consult this privacy policy periodically in order to keep up to date with any changes.