

**Subject: INFORMATION STATEMENT PURSUANT TO ART. 13-14 OF THE GDPR ON THE
PROCESSING OF PERSONAL DATA - WHISTLEBLOWING**

1. Data controller

Ciemmecalabria S.R.L. (hereinafter also “the Company” or “Ciemmecalabria”) in the person of its legal representative, in its capacity as Data Controller, hereby informs you that Regulation (EU) no. 2016/679 (known as GDPR) and (It.) Legislative Decree no. 196/2003, as amended and supplemented, govern the protection of personal data. Ciemmecalabria bases its data processing on the principles of fairness, lawfulness, transparency and necessity, as provided for in the aforementioned legislation. To this end, pursuant to Articles 13-14 of the GDPR, we provide you with the following information.

2. Type of data processed

The receipt and handling of reports gives rise to the processing of “common” personal data (name, surname, job role, any other information related to the alleged or founded unlawful conduct), and may also give rise, depending on the content of the reports and the acts and documents annexed thereto, to the processing of “special” personal data (data relating to health conditions, sexual orientation or trade union membership, as referred to in Art. 9 of the GDPR) and personal data relating to criminal convictions and offences (referred to in Art. 10 of the GDPR).

3. Purpose and legal basis of the processing

The personal data are collected and processed for the purposes strictly related to the management of reports of unlawful conduct in violation of national/European regulations and, if adopted, of the Company's Code of Ethics and the Organisation, Management and Control Model.

Taking into account the relevant legislation (EU Directive No. 1937/2019 and It. Legislative Decree no. 24/2023), the legal basis for such processing is therefore represented:

- For the processing of common data, by Art. 6.1(c) of the GDPR (“fulfilment of a legal obligation to which the data controller is subject”).
- For the processing of special and judicial data, Art. 9.2. letter (g) of the GDPR

4. Methods of processing

Please note that the Data Controller undertakes to process, in a lawful, correct and transparent manner, only the data necessary to achieve the purposes that are indispensable for the performance of the activities reported.

The processing is carried out by the Data Controller also with the aid of electronic means, including automated tools, and tools for receiving reports in verbal form equipped with appropriate security (file encryption), organisational, technical and physical measures to protect the information against alteration, destruction, loss, theft or improper or unlawful use.

The reports and the documents relating to their handling will be kept for five years from the date of the communication of the final outcome of the reporting procedure.

The identity of the reporting person and any other information from which that identity may be inferred, directly or indirectly, will be processed exclusively by persons authorised to process the data in accordance with Article 29 GDPR and will not be disclosed to any other person without that person's specific consent, as required by Article 12 no. 2 of the Decree. Consent is optional and is given when reporting via the platform.

5. Disclosure and transfer of data

Your data will not be disseminated, but will be processed by the following entities, including but not limited to:

- public authorities in fulfilment of specific legal obligations and judicial authorities acting as autonomous data controllers
- external companies entrusted with report management services and IT service providers, which act as Data Processors within the meaning of Art. 28 of the GDPR subject to confidentiality and only for purposes related to the task assigned to them
- Supervisory Body
- Legal advisers possibly involved in the investigation phase
- Any professional figures that may be involved in the inquiry and investigation phase, specifically authorised for this purpose and bound to confidentiality

The list of external Data Processors is available at the Company's registered office.

6. Rights of the data subject

Please note that, pursuant to Articles 15 to 22 of the GDPR, it is possible to exercise, within the limits of Article 2-undecies of the Privacy Code, the right to:

- a) access to the personal data;
- b) their rectification in case of inaccuracy;
- c) erasure of the data;
- d) restriction of the processing;
- e) the right to data portability, i.e. to receive in a structured, machine-readable format the personal data provided and to have them transferred to another data controller without hindrance;
- f) the right to object to the processing, if the conditions are met.

In addition, it is possible for the data subject to lodge a complaint with the Italian Data Protection Authority based in Piazza Venezia 11, 00187 Rome.

If you have any further questions about this policy or any privacy issues, or if you wish to exercise your rights, please contact info@cmcindustries.com.