

Notice pursuant to personal data protection regulations – WHISTLEBLOWING

Pursuant to Article 13 of Regulation (EU) No. 2016/679 (General Data Protection Regulation, hereinafter GDPR) and Legislative Decree 24/2023, FiberCop S.p.A. provides the following information regarding the processing of personal data related to the management of reports, as governed by FiberCop's Whistleblowing Procedure, applicable to FiberCop.

1. Categories of personal data

- a) General personal data as per Article 4, point 1, of the GDPR concerning the whistleblower (in the case of non-anonymous reports), as well as any individuals involved or mentioned in the report and facilitators, as defined by the Whistleblowing Procedure (hereinafter "Data Subjects"), such as: personal details (e.g., name, surname, date and place of birth), contact information (e.g., landline and/or mobile phone number, postal/email address).
- b) Special categories of data as per Article 9 of the GDPR, if included in the report.

2. Purpose of processing and legal basis

The aforementioned personal data is processed by the Data Controller for the following purposes:

- a) Management of the report made pursuant to Legislative Decree 24/2023;
- b) Compliance with obligations under law or EU regulations;
- c) Defence or verification of the Data Controller's rights in civil, administrative, or criminal proceedings.

The legal basis for processing is as follows:

- For the purpose under letter a), compliance with a legal obligation to which the Data Controller is subject (Art. 6, para. 1, letter c) of the GDPR); additionally, for recorded reports collected via telephone or through voicemail or oral systems, the whistleblower's consent (Art. 6, para. 1, letter a) of the GDPR);
- For the purpose under letter b), compliance with a legal obligation to which the Data Controller is subject (Art. 6, para. 1, letter c) of the GDPR);
- For the purpose under letter c), the legitimate interest of the Data Controller (Art. 6, para. 1, letter f) of the GDPR).

Providing data is necessary to achieve the purposes outlined above; failure, partial, or inaccurate provision may result in the inability to manage the report.

3. Retention of personal data

FiberCop S.p.A. retains personal data in accordance with and for the periods set forth in Article 14 of Legislative Decree No. 24/2023, i.e., for the time necessary to process the report and in any case for no more than 5 years from the date of the final outcome of the report being communicated to the 231 Supervisory Body.

Personal data that is clearly not relevant to processing a specific report is not collected, or if accidentally collected, is promptly deleted.

4. Methods and logic of processing

Data processing is carried out manually and/or using automated IT and telematic tools, with logic linked to the purposes outlined above, and in a manner that ensures security and confidentiality. The report management system ensures, at all stages, the confidentiality of the whistleblower's identity, individuals involved and/or mentioned in the report, the report's content, and related documentation, except as provided under Article 12 of Legislative Decree No. 24/2023.

5. Data Controller, Data Protection Officer, and authorised data processors at FiberCop S.p.A.

The Data Controller of personal data is FiberCop S.p.A., headquartered at Via Marco Aurelio 24, 20127 Milan (MI).

The Data Controller has appointed a Data Protection Officer, who can be contacted at FiberCop at

the following address: FiberCop S.p.A., Via Marco Aurelio, No. 24 – 20127 Milan; or by emailing dpo.fibercop@fibercop.it.

The Data Controller has established a Supervisory Body appointed pursuant to Article 6, point 1, letter b) of Legislative Decree No. 231/2001, with independent powers of initiative and control, based at the company's registered office. The members of this body have been appointed as authorised data processors and have received appropriate operational instructions.

To process reports, FiberCop S.p.A. relies on support from its Audit Department personnel and their delegates, who have been appointed as authorised data processors and provided with appropriate operational instructions.

6. Categories of third parties to whom data may be disclosed

Some personal data processing may be carried out by FiberCop, including abroad in EU or non-EU countries. In the latter case, data transfers are made based on the existence of a European Commission decision regarding the adequacy of the non-EU country's data protection level, or on the basis of appropriate guarantees under Articles 46 or 47 of the GDPR (e.g., adoption of "standard contractual clauses" approved by the European Commission) or other legal bases for data transfer under Article 49 of the GDPR.

Additionally, some processing activities may be carried out by third parties entrusted by FiberCop with certain tasks (or parts thereof) for the purposes outlined in point 2); these entities will act either as independent Data Controllers or as Data Processors and are essentially included in the following categories:

- a) Consultants (e.g., organisational, legal, or litigation support);
- b) Companies managing HR and personnel administration;
- c) Auditing firms;
- d) Investigative agencies;
- e) Institutions and/or public authorities, judicial authorities, law enforcement agencies.

7. Data Subjects' Rights

The Data Subject, including whistleblowers or facilitators, has the right to access their data at any time and to exercise the rights provided under Articles 15 to 22 of the GDPR, where applicable (e.g., the right to access personal data, rectify it, request its deletion or "right to be forgotten," restrict its processing, data portability, or object to processing), by sending an email to dpo.fibercop@fibercop.it. Additionally, the Data Subject has the right to lodge a complaint with the Data Protection Authority.

These rights cannot be exercised by individuals involved or mentioned in the report for the time and to the extent that such a measure is necessary and proportionate under Article 2-undecies of the Privacy Code, as exercising such rights could result in significant and concrete harm to the confidentiality of the whistleblower's identity.

July 2024

FiberCop S.p.A.