

PRIVACY NOTICE

PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

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INTRODUCTION

Teoresi S.p.A., in accordance with the applicable legislation, undertakes to process your personal data in accordance with the principles of lawfulness, fairness, transparency, pertinence and minimisation established by Article 5 of EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data ("GDPR").

Teoresi S.p.A. invites you to read the following privacy notice drawn up pursuant to articles 13 and 14 GDPR. This privacy notice is addressed to all those who make, as "Whistleblowers", or are subject to, as "reported persons", a report concerning an infringement of national law, European Union law or Company Policies, (hereinafter "Whistleblowing reports"), deemed as behaviours, acts or omissions that undermine the integrity of the Company, which they have become aware of at the working environment; the privacy notice is also addressed to any facilitators and third parties involved in the report (the "Data Subjects").

1. DATA CONTROLLER

Teoresi S.p.A., with registered office in Turin, Via Perugia, 24 - 10152 - P.IVA 03037960014 receives and manages the Whistleblowing reports by resorting to an internal reporting channel in the form of digital platform, and for these purposes it acts as Data Controller of processing.

The contact details of the Data Controller are: Tel. 011.2408000; e-mail: privacy@teoresigroup.com; PEC: teoresi.adm@pec.it

2. DATA PROTECTION OFFICER

Teoresi appointed a Data Protection Officer so as required by the GDPR ("Data Protection Officer" or "DPO"), entrusted by law with monitoring the compliance with the Regulation, as well as tackling requests from data

subjects within the context of the legitimate exercise of the rights recognized by the Regulation, and acting as a reference point towards the Privacy Authority.

For all issues related to the processing of your personal Data and/or to the exercise of your rights listed under point 10 of this notice, you may contact the DPO to the following email address: dpo.ask@teoresigroup.com

3. CATEGORIES OF PROCESSED DATA AND LEGAL BASIS FOR PROCESSING

As a matter of principle, Whistleblowing reports can be carried out without disclosing any personal data relating to the identity of the Whistleblower. However, throughout the whistleblowing report procedure, it is possible to voluntarily disclose its own identity, as well as personal data of the reported person and of other people involved. Now therefore, depending on whether a report is made in an identified or anonymous manner, the following data may be processed:

- a. Anonymous and identified report:
 - reported person data: common identification data (name, surname), job position, relationship with the Whistleblower;
 - data of other persons involved or who are aware of the reported event: common identification data (first name, surname);
 - facilitators' data: common identification data (first name, surname).

- b. Identified report:
 - Whistleblower data: common identification data (first name, surname), category (e.g. employee, supplier, intern, subcontractor, etc.), kind of relationship with the company (current employment, following termination of the legal relationship, etc.), any further data enriching the report that is voluntarily provided by the Whistleblower.

As a general rule, the collection of particular data (such as, for instance, information on racial and/or ethnic origin, religious and/or ideological beliefs, trade union membership or sexual orientation) is not envisaged. However, such special categories of data may be voluntarily disclosed by the Whistleblower in free text fields. In the event that sensitive and/or particular data within the meaning of Article 9 GDPR, as well as data relating to criminal convictions and offences pursuant to Article 10 GDPR are disclosed, such data will only be used to the extent they turn out to be strictly necessary for handling the report, and in full compliance with the principles of necessity and data minimisation. Accordingly, if such data are considered irrelevant for the purpose of handling the report, there will be no further processing thereof.

4. PURPOSE OF THE PROCESSING

PURPOSES	LEGAL BASIS
Handling identified reports of violations (conduct, acts or omissions) of regulatory provisions, affecting the integrity of the Company and which the Whistleblower has become aware of at working environment	

Carrying out internal investigations aimed at substantiating the soundness of the report, for the purposes of a proper management thereof	Legal obligation the Data Controller is subject to
Potential disciplinary proceedings initiation	Consent of the Whistleblower, establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
Allowing the whistleblower to make a vocal report by means of audio transcription	
Potential criminal proceedings initiation	Legitimate interest of the Data Controller, establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
Potential initiation of proceedings before the Court of Auditors following the preliminary investigation phase closure	

5. NATURE OF DATA PROVISION

The provision of your personal data is optional, since reports can be made either by revealing the identity or anonymously, at the Whistleblower's discretion. A refusal to provide such data does not have any detrimental effect on the Whistleblower, but only makes it impossible, *ex lege*, to initiate disciplinary proceedings against the reported person, as the express consent of the Whistleblower to reveal his/her identity is needed.

6. PROCESSING METHODS

Data will be processed and collected through paper-based instruments, computer and telematic media, also by entering them into databases, archives, platforms, suitable to ensure the security and confidentiality of the Data, in accordance with the provisions of art. 32) of the European Privacy Regulation UE/2016/679 (GDPR).

However, by carrying out the processing operations the minimum level of data protection required by law is guaranteed by adopting all the technical, computer, organizational, logistical and procedural security measures, as provided for in Annex B of Legislative Decree no. 196/03. In particular, the transfer of your Data is subject to encryption. The data processing is not subject to automated means only. Your Data will be likewise processed only by personnel expressly authorized by the Data Controller.

7. DATA RECIPIENTS

Your Personal Data may be disclosed by the Company to the following subjects:

- *Ex lege* authorized Public Administration Authorities;
- Supervisory Body (Italian OdV), in the capacity of external body tasked with supervisory and control functions in the context of liability of entities based on offences committed in the interest or to the benefit thereof, as well as in the capacity of body in charge of the management of reports falling into its area of competence.

8. DATA RETENTION PERIOD

Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimisation, your Data will be retained for the time necessary to achieve the purposes actually pursued, pursuant to Art. 5 of the GDPR, meaning no longer than 5 years from the date on which the communication concerning the outcome of the reporting procedure is made by the Data Controller, unless, during that period, disciplinary/judicial proceedings arise out of the Report. In such case, the data retention period will depend on the duration of said proceedings, and in any case, it will stick to what is required by law.

In the event of an anonymous report, the Data Controller will keep the related documentation for no longer than 5 years from the date on which the communication concerning the outcome of the reporting procedure is made by the Data Controller, so as to make it possible to trace it out in the event that the Whistleblower informs the National Anti-Corruption Authority (ANAC) that he/she has suffered retaliatory measures as a result of that anonymous report.

9. DATA PROCESSOR

Your personal data will be processed by the Data Processor appointed by the Data Controller, which will process the data on behalf of the latter, by implementing all the security guarantees set forth by the GDPR as well as the applicable Privacy and Data Protection law, aimed to safeguard such data.

10. RIGHTS OF DATA SUBJECT

As a data subject, you may exercise the rights provided for by Artt. 15-22. GDPR against Teoresi. To exercise your rights, you may send a communication to privacy@teoresigroup.com. Your request will be processed by the Data Controller within 28 days.
