

PRIVACY POLICY

This Privacy Policy is provided pursuant to Art. 13 of European Regulation no. 679/2016 (hereinafter also "GDPR").

CONTROLLER.

The Controller is OGNIBENE POWER S.P.A., based at Via Ing. Enzo Ferrari no. 2, Reggio Emilia, Italy.

LOCATION OF DATA PROCESSING.

The data processing activities take place within the European Community and no transfer of personal data to non-EU countries is carried out.

PURPOSES OF DATA PROCESSING.

The personal data provided through the use of the @WHISTLEBLOWING platform is used for the sole purpose of managing the report made by the Whistleblower.

DATA PROCESSED.

The personal data processed comprises exclusively:

- first name, surname, telephone number and e-mail address of the Whistleblower, if the Whistleblower has opted for non-anonymous reporting;
- information stated in the report and in any documents attached to it, relating to the Reported Person, to any witnesses and/or any other people involved.

LAWFUL BASIS FOR PROCESSING.

The lawful basis for the processing of personal data is the need to comply with the legal obligations deriving from Whistleblowing legislation (Italian Legislative Decree 24/2023 on the protection of persons reporting on breaches of Union law and containing provisions concerning the protection of persons reporting breaches of national regulatory provisions).

STORAGE PERIOD.

The personal data provided with the report will be retained in compliance with the confidentiality requirements, for the time necessary to carry out the management of the reports received and, in any case, no longer than five years from the date of communication of the final outcome of the Whistleblowing Procedure.

WHO WE SHARE THE COLLECTED DATA WITH.

Only those in charge of investigating the whistleblowing reports can access the personal data contained in the report, in the role of Whistleblowing Manager.

If, for investigative reasons, individuals other than the Manager must be made aware of the content of the report and/or the documentation attached to it, the identity of the Whistleblower and any other information from which the latter's identity can be inferred, directly or indirectly, will be disclosed to such individuals only with the express consent of the Whistleblower.

PROCESSING METHODS.

Personal data is processed using both computerized and manual tools for the purposes indicated above.

Specific security measures are observed to prevent data loss, unlawful or incorrect use, and unauthorized access.

DATA SUBJECT RIGHTS.

Within the limits of the provisions of Art. 2-*undecies* of Italian Legislative Decree no. 196 of June 30, 2003, data subjects may exercise the rights provided for in Articles 7, 8, 9 and 10 of the Privacy Code and Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR and, in particular, request:

- access to their personal data,
- a copy of the personal data provided (so-called portability),
- the rectification of data,
- the deletion of any data for which the legal basis for processing no longer exists,
- opposition to the processing, where provided for by the applicable legislation,
- the withdrawal of consent, in the event that the processing is based on this legitimate basis,
- limitation to the way in which personal data is processed, within the limits provided for by law.

In the case of doubts regarding compliance with the Privacy Policy, its application, the accuracy of their personal data or the use of the information collected, data subjects can contact the Whistleblowing Manager appointed by the Controller, using the adopted internal whistleblowing channel.

Whistleblowers may submit their complaints or reports, pursuant to Art. 77 of the GDPR, to the Italian Data Protection Authority, using the relevant contact details:
Garante per la protezione dei dati personali - Piazza di Monte Citorio no. 121 - 00186 ROME, ITALY - Fax: (+39) 06.69677.3785 - Telephone: (+39) 06.696771 - E-mail: garante@gpdp.it - Certified e-mail: protocollo@pec.gpdp.it.

For complete information on the operation of the whistleblowing channel and the protection of the confidentiality of the Whistleblower and people involved, please read the Whistleblowing Procedure adopted and published on the Controller's website.

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