

**INFORMATION PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679 ON THE
PROCESSING OF PERSONAL DATA OF PERSONS REPORTING WRONGDOINGS**
(LEGISLATIVE DECREE OF MARCH 10, 2023, NO. 24)

Pursuant to Article 13 of Regulation EU 679/2016, Tecnocap TL s.r.l. (hereinafter "Tecnocap" or the "Company") provides this document with information regarding the processing of personal data acquired through the form for reporting alleged unlawful conduct. The provision of personal data is mandatory, as failure to do so will prevent the initiation of the procedure triggered by the submission of the form for reporting alleged unlawful conduct.

1. DATA CONTROLLER

The Data Controller (i.e., the entity that determines the purposes and means of the processing of personal data) is Tecnocap TL S.r.l., located in Corso Carlo Alberto n. 29 s.n.c., tax code 03690020130, phone: +39 0341 484199. For specific inquiries regarding dataprotection, including exercising the rights referred to in point 7 below, the following email address is provided: privacy.spa@tecnocapgroup.com.

2. LEGAL BASIS FOR PROCESSING

The personal data provided will be processed by the Supervisory Body (hereinafter also referred to as "OdV") appointed by the Company, for purposes related to compliance with legal obligations under Legislative Decree of March 10, 2023, No. 24, in performing its tasks related to its powers, specifically to ascertain any reported unlawful acts in the interest of the integrity of Tecnocap TL s.r.l. Since the data processing is necessary to comply with a legal obligation, consent is not required.

3. TYPES OF DATA PROCESSED AND PURPOSES OF PROCESSING

The personal data provided includes all information regarding the whistleblower necessary to represent the alleged unlawful conduct they became aware of due to their employment relationship with the Company. Such data is processed to carry out the necessary investigations to verify the validity of the reported event and to take appropriate measures. Examples of personal data processed include identification data, telephone contacts, and email addresses.

4. DATA RECIPIENTS

The data collected following the report may be shared, if necessary, with the Judicial Authorities, the Court of Auditors, and ANAC (National Anti-Corruption Authority). The personal data collected will also be processed by the staff of Tecnocap TL, who act based on specific instructions regarding the purposes and methods of processing. Specifically, the Supervisory Body (OdV) and its supporting staff, as well as the staff of relevant company departments that the OdV may consult for verification activities, may become aware of the whistleblower's personal data. The data will not be disclosed.

5. DATA PROCESSING METHODS AND RETENTION PERIOD

Data processing will be carried out using automated and manual tools, adopting security measures to ensure the protection and confidentiality of the data. For the purposes mentioned above, personal data may be retained for five years or the time necessary to complete the process, or for the periods required to conclude proceedings before the Judicial Authorities, the Court of Auditors, and ANAC.

6. LOCATION OF DATA PROCESSING

The processing of personal data takes place within the European Union.

7. DATA SUBJECT'S RIGHTS

The GDPR grants the data subject the following rights concerning their personal data (the following is a brief description; for more details, refer to the GDPR, specifically Articles 15-22):

- **Access to personal data:** The data subject has the right to receive free information regarding the personal data held by the Data Controller and its processing, as well as to obtain a copy in an accessible format.
- **Rectification of data:** Upon notification by the data subject, the Data Controller will correct or update inaccurate or outdated personal data.
- **Erasement of data (right to be forgotten):** For example, when data is no longer necessary for the purposes for which it was collected, has been unlawfully processed, or must be erased to comply with a legal obligation.
- **Restriction of processing:** in certain cases - disputing the accuracy of data during the time required for verification; disputing the lawfulness of processing with an objection to deletion; the need for use to defend the Data Subject's rights while they are no longer necessary for processing purposes; if there is an objection to processing while necessary checks are carried out - the data will be stored in a way that allows them to be restored if needed but, in the meantime, will not be accessible to the Data Controller except in relation to the validity of the Data Subject's request for restriction, or with the consent of the Data Subject, or for the establishment, exercise, or defense of legal claims, or to protect the rights of another natural or legal person, or for reasons of substantial public interest of the Union or of a Member State).

The data subject also has the right to file a complaint with the Italian Data Protection Authority if they believe that the processing of their data violates the provisions of the Regulation. The Data Protection Authority can be contacted through the contact details provided on its website: www.garanteprivacy.it. However, Tecnocap TL would like to have the opportunity to address any concerns of the data subjects in advance. They can contact the email address carmine.buoninconti@cbsl.eu or the other contact details of the Data Controller mentioned above for any clarification regarding the processing of their personal data and for the exercise of their related rights.

8. DATA PROTECTION OFFICER

For any questions or requests regarding the processing of your personal data, you can contact the Data Controller at any time via the following email address:
privacy.spa@tecnocapgroup.com.