

**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 S.p.A. (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 S.p.A., located in Cava de' Tirreni (SA), Via Starza s.n.c., tax code 02865960658, phone: +39 089441522. For specific inquiries regarding data protection, 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 S.p.A. 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 S.p.A., 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.
- **Erasure 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 (e.g., contesting the accuracy of the data, the legality of the processing, or when the data subject opposes erasure but still requires the data for defense), the data will be retained but not processed until the issue is resolved.

The data subject also has the right to lodge a complaint with the Data Protection Authority if they believe that the processing violates the GDPR. The Data Protection Authority can be contacted via the details provided on its official website (www.garanteprivacy.it). However, Tecnocap S.p.A. would prefer to address any concerns directly and invites data subjects to contact the company at the email address d.rocchi@rpcpenalisti.it or the other contact details provided for the Data Controller.

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.