Concerning the processing of personal data carried out in the management of reports

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("**GDPR**"), **RUBELLI S.p.A.** provides this notice regarding the processing of personal data carried out in the management of internal reports under Legislative Decree No. 24 of 10 March 2023 and within UNI/PdR 125:2022.
This notice refers to the processing of personal data of the reporting person, the person involved or reported, the facilitators and any other persons mentioned in or affected by the report.

1 DATA CONTROLLER

The Data Controller is: **RUBELLI S.p.A.** with registered office at Via Ca' Pisani Rubelli, S. Marco 3395, 30124 Venice (VAT No. 03333900276), e-mail: info@rubelli.com , Certified e-mail (PEC): rubellispa@legalmail.it , (hereinafter, the "**Company**" or the "**Controller**").
For any request relating to the processing of personal data and the exercise of the rights provided for by the GDPR, the Controller may be contacted at the e-mail address: privacy@rubelli.com

2 PURPOSES OF THE PROCESSING

The personal data provided through the internal reporting channel are processed in order to:

- receive, examine and manage reports of unlawful conduct or breaches relevant under Legislative Decree No. 24/2023;
- receive, examine and manage reports concerning facts, conduct, practices or omissions potentially contrary to the principles of gender equality, equity and inclusion, consistently with the Diversity, Equity & Inclusion Policy ("DE&I Policy") adopted by Rubelli and with UNI/PdR 125:2022;
- carry out the investigative activities necessary to verify the merits of the facts reported;
- adopt any consequent measures;
- comply with the obligations provided for by applicable whistleblowing legislation;
- establish, exercise or defend a right in judicial or extrajudicial proceedings.

3 CATEGORIES OF DATA PROCESSED

In the management of reports, the following may be processed:

- identification and contact data of the Reporting Person, where provided;
- identification data of the reported person and of any other persons involved in or mentioned in the report;
- information contained in the report and in the attached documentation;
- any further personal data strictly necessary to ascertain the facts reported.

The Company invites Reporting Persons to provide only data that are relevant and necessary for the purposes of the report.

4 LEGAL BASIS OF THE PROCESSING

The processing of personal data is necessary:

- to comply with the legal obligations provided for by Legislative Decree No. 24/2023 and by applicable whistleblowing legislation and, where relevant, by Legislative Decree No. 231 of 8 June 2001 (Art. 6(1)(c) GDPR);
- in the cases provided for by whistleblowing legislation, on the basis of the data subject's consent pursuant to Art. 6(1)(a) GDPR, where it is necessary to disclose the identity of the reporting person;
- in the cases provided for by the DE&I Policy and the DE&I Reporting Policy, on the basis of the data subject's consent pursuant to Art. 6(1)(a) GDPR;
- for the pursuit of the Controller's legitimate interest in preventing unlawful conduct or conduct not compliant with the principles established by the DE&I Policy and in protecting the organisation (Art. 6(1)(f) GDPR, where applicable).

The data indicated above may include, where contained in the report: special categories of personal data pursuant to Article 9 of the GDPR (for example, data capable of revealing health status, political opinions, religious or philosophical beliefs, sexual orientation or trade union membership) and personal data relating to

criminal convictions and offences pursuant to Article 10 of the GDPR. The Company invites Reporting Persons to refrain from providing such categories of data where they are not strictly necessary and indispensable for the purposes of the report.

5 HOW TO SUBMIT REPORTS

Reports may be submitted through the dedicated IT platform adopted by the Company and accessiblevia the link: https://digitalroom.bdo.it/Rubelli
The Reporting Person may choose to make the report either by disclosing their identity or anonymously.

6 PERSONS AUTHORISED TO MANAGE REPORTS

The management of the reporting channel is entrusted to the Report Managers (identified as members of the Supervisory Body and the Human Resources Manager). These persons act in compliance with specific confidentiality obligations and are adequately trained to manage reports in accordance with the legislation in force.
Access to the information contained in the reports is permitted exclusively to persons authorised to receive, view and manage them and to further persons whose involvement is strictly necessary for the purposes of the investigation.

Reports received concerning DE&I matters are forwarded to the Steering Committee for Diversity, Equity and Inclusion ("DE&I Committee"), which examines and handles them with the utmost confidentiality, ensuring, in any event, the protection of the reporting person.

7 CONFIDENTIALITY OF THE REPORTING PERSON'S IDENTITY

The identity of the Reporting Person and any information from which it may be inferred shall not be disclosed to persons other than those competent to receive or follow up on reports, except in the cases expressly provided for by law.
The Company adopts appropriate technical and organisational measures to ensure the confidentiality of the information processed and the protection of the persons involved.

8 RECIPIENTS OF THE DATA

Personal data may be disclosed, within the limits of their respective competences and to the extent strictly necessary for the pursuit of the purposes indicated above, to:

- persons charged with managing reports and persons authorised to carry out the processing;
- consultants and professionals assisting the Company in the investigative activities;
- IT service providers acting on behalf of the platform;
- judicial authorities, administrative authorities or other competent authorities, in the cases provided for by law;
- persons to whom disclosure is mandatory by virtue of legal provisions.

The data will not be disseminated.

9 METHODS OF DATA PROCESSING

The processing of personal data is carried out by analogue and/or electronic and computerised means, by the authorised persons referred to in paragraph 6, in accordance with the principles of fairness, lawfulness, transparency and minimisation set out in Article 5 of the GDPR. The Company adopts appropriate technical and organisational measures — of a physical, logical and organisational nature — designed to ensure the security and confidentiality of the data at every stage of the procedure, including the archiving of the report and the related documents.

10 DATA RETENTION

Reports and the related documentation are retained for the time necessary to process the report and, in any event, for a period not exceeding five years from the date of communication of the final outcome of the

reporting procedure, unless further retention is necessary in the cases provided for by law or for the protection of the Company's rights.
Where, before the expiry of that period, judicial, administrative or disciplinary proceedings are instituted, only the data and documents that are necessary may be retained separately for the duration of the relevant proceedings and for any subsequent period necessary for the exercise or defence of rights, in compliance with the principles of necessity, proportionality and minimisation.
Any personal data contained in the report that are manifestly not necessary or not relevant to its processing will not be used and will be deleted without delay.

11 TRANSFER OF PERSONAL DATA

Where the platform provider or other persons involved in the processing transfer personal data to countries outside the European Economic Area, such transfers will be carried out in compliance with the conditions and safeguards provided for by Article 44 et seq. of the GDPR.

12 RIGHTS OF DATA SUBJECTS

Data subjects may exercise, in the cases provided for by applicable legislation, the rights set out in Articles 15 et seq. of the GDPR, including the right of access, rectification, erasure, restriction of processing and objection.
The exercise of these rights may be limited in the cases provided for by Article 2-undecies of Legislative Decree No. 196/2003, where it could cause actual and concrete prejudice to the confidentiality of the Reporting Person's identity or to the proper conduct of the verification and investigation activities.
To exercise these rights, a specific request may be addressed to the Controller at the contact details indicated in paragraph 1, also using the form made available on the website of the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali).

13 COMPLAINT TO THE SUPERVISORY AUTHORITY

Data subjects have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) pursuant to Article 77 of the GDPR, as well as to bring the matter before the competent courts.