

PRIVACY POLICY FOR THE PROCESSING OF PERSONAL DATA Whistleblowing Reports

Thaleia S.p.A., with its headquarters at Via Santa Tecla 4, 20122 Milan (MI) (hereinafter “**Thaleia**” or the “**Controller**”), in accordance with Articles 13 and 14 of Regulation (EU) No. 2016/679 (the “**Privacy Regulation**”) and Legislative Decree 196/03 and subsequent amendments, provides this information on the purposes and methods by which the personal data collected from Data Subjects within the scope of "whistleblowing" reports will be processed. These are reports of alleged irregularities or illegal conduct that have come to the attention of the reporter due to an employment, collaboration, service, or supply relationship with Thaleia.

Terms used herein with capital letters, unless expressly defined, will have the meaning attributed to them in the Whistleblowing Procedure adopted by the Company and available on Thaleia's website at <https://thaleia.whistleblowing.it/>.

Recipients

This policy applies to Reporters, Reported Persons, Facilitators, and all subjects (collectively referred to as the “**Data Subjects**”) involved in the Report or its management, whether the Report is made using the Digital Platform or through other available channels.

Types of Data

The Reporter is free to submit the Report anonymously; however, if they choose to reveal their identity, the personal data subject to processing may include: "ordinary" data (e.g., personal details, workplace...), "special" data (e.g., health status, sexual orientation...), "judicial" data (e.g., criminal records, convictions...).

Purpose of Data Processing

The personal data collected will be processed for purposes related to the fulfillment of legal obligations based on applicable regulations, particularly for the management of Reports received through the channels provided by Thaleia, as well as for handling responses to potential requests from Public Authorities.

Authorized Data Processor

The entity responsible for managing Reports within Thaleia and therefore authorized to process the personal data in question is the Supervisory Body of Thaleia and any other persons authorized by it in the Report management process.

Data Processing Methods

Data processing may be conducted through both IT and telecommunication tools as well as on paper, in any case – in compliance with the Privacy Regulation – using tools capable of ensuring security, availability, integrity, confidentiality, and, if necessary, anonymity. Processing will be carried out for the time strictly necessary to achieve the processing's purpose and, in any case, for a period not exceeding five years from the closure of the Report management process.

Data Disclosure

The identity of the Reporter and any other information from which such identity can be directly or indirectly inferred cannot be disclosed, without the explicit consent of the Reporter, to persons other than those authorized to receive or follow up on the Reports. Such persons are expressly authorized to process this data.

In disciplinary proceedings, the identity of the Reporter cannot be disclosed if the disciplinary charge is based on findings separate and additional to the Report, even if subsequent to it. If the charge is based, in whole or in part, on the Report and knowing the identity of the Reporter is essential for the defense of the accused, the Report will only be used for disciplinary proceedings if the Reporter gives explicit consent for the disclosure of their identity.

Controller and Data Processor

The Data Controller is Thaleia S.p.A. as identified above. The Data Processors are the service providers designated as such under the Privacy Regulation. The technical implementation of the Digital Platform is managed by Whistleblowing Solutions I.S. S.r.l., which has been entrusted by Thaleia with the management of the whistleblowing reporting system and acts as the Data Processor.

Exercise of Rights

Pursuant to Articles 15 to 22 of the Privacy Regulation, you may exercise your rights as specified in these articles at any time, including the right to access data, rectification, deletion, restriction, portability, objection, and to be informed of processing conducted through automated decision-making processes relating to individuals, including profiling.

You can exercise these rights by writing to our email address privacy@thaleia.it or by communicating to the following address: Via Santa Tecla 4, 20122 Milan (MI).

Furthermore, you have the right to lodge a complaint with the Data Protection Authority.