

Minifaber S.p.A

Via Brusaporto, 35 24068 Seriate BG VAT 01777830165 221-WHISTLEBLOWING INFORMATION NOTE Ver. 2.0 of 15-06-2023 Page 1 of 2

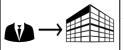
WHISTLEBLOWING INFORMATION



A. CATEGORIES OF DATA: the object of the processing may be your personal data such as identification data, personal data, contact data, data relating to your job and any further information related to the unlawful conduct and the persons involved, as well as any other personal data contained in the report and/or in the attached supporting documentation



B. DATA CONTROLLER: The data controller is Minifaber Spa, VIA Brusaporto, 35 - 24068 Seriate BG VAT No. 01777830165 contactable by phone at 0354237211 or email contact@minifaber.com



C. SOURCE OF PERSONAL DATA: The personal data held by the Controller are collected directly from the person concerned. Subsequently, the Controller may collect other data during the investigation phase





• Purposes related to legal obligations, Legislative Decree 24/2023, regarding the protection of persons who report breaches of national or European Union regulatory provisions detrimental to the public interest, the integrity of the public administration or the private entity, which they became aware of in a public or private work environment.

Personal data are processed as part of the whistleblowing management process, exclusively for the purposes of investigating and ascertaining the facts being reported and taking any related action.

• Purpose based on the explicit **consent** to record the voice over the phone/voice messaging system, in order to be able to keep a record of the submitted verbal report/Purpose based on the explicit **consent** to transcribe the unrecorded verbal report in full (e.g. during a face-to-face meeting)



E. RECIPIENTS OF THE DATA: to the extent relevant to the purposes, your data will be communicated to the Supervisory Body managing the reporting channel; to the National Anti-Corruption Authority; to the Ordinary Judicial Authority or to the Accounting Judicial Authority, in the cases provided for by the legislation. In addition, subject to measures being taken to ensure the confidentiality of the reporter's identity and any further elements of the report, to the company providing the IT services operating the IT tools enabling the report to be made, duly appointed as data processor pursuant to Article 28 GDPR; to other entities connected with the processing activities; to public and private entities as required by law; to law firms or other professionals qualified to study and resolve any legal matters; to trade unions in the cases provided for by law and contractual provisions; and to other entities functional to achieving the purposes set out above. Your data will not be disseminated in any way.



F. THIRD COUNTRIES DATA TRANSFER: data collected is not transferred to third countries outside the European Economic Area



G. RETENTION PERIOD: the data collected will be kept for as long as necessary in order to process the report, and in any case no longer than five years from the date of the communication of the final outcome of the reporting procedure. Obsolescence of the retained data in relation to the purposes for which they were collected is checked periodically



H. RIGHTS OF THE DATA SUBJECT: The rights referred to in Articles 15 to 22 of Regulation (EU) 2016/679 may be exercised within the limits of the provisions of Article 2-undecies of Legislative Decree No. 196 dated 30 June 2003, to which reference is made.



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I. OBLIGATION TO COMMUNICATE DATA: The disclosure of personal data is optional. Failure to do so,

however, could jeopardise the investigation of the report.

J. DATA PROCESSING METHODS: the data subject has two reporting channels at his disposal: an internal and an external channel of the National Anti-Corruption Authority, to be used as a residual option to the internal channel and if certain conditions are met pursuant to Article 6 of Legislative Decree no. 24/2023 (please refer to the Whistleblowing procedure).



Internal reporting channel via the **EQS Integrity Line** platform: the use of this channel guarantees appropriate measures that ensure the confidentiality of the information reported. The platform provider is unable to identify the reporting party: the system does not store data from the devices used to make the report such as IP address and browsing data, the communication channel is encrypted

The data will therefore be processed both with IT tools and on paper or any other suitable type of support (e.g. cloud systems, archiving systems ...), in compliance with the appropriate technical and organisational security measures provided for by the GDPR and the applicable whistleblowing legislation.

For voice recording, the software adopts as an additional security measure the alteration of the vocal timbre to prevent the identification of the reporting subject



L. AUTOMATED DECISION-MAKING PROCESSES: No automated decision-making processes