

POLICY ON THE HANDLING OF REPORTS OF UNLAWFUL AND IRREGULAR CONDUCT (WHISTLEBLOWING)

REGULATION (EU) 2016/679 (GDPR)

This policy describes how we collect, use and disclose personal data gathered in connection with reports of unlawful and irregular conduct (“whistleblowing”), collected via the Whistlelink online channel, and the methods by which we carry out the related processing operations to ensure security and confidentiality, in accordance with company procedure PR 21.1 (*Procedure for the management of reports*), Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (hereinafter “GDPR”), as well as any further applicable legislation on the protection of personal data, to the extent compatible with the GDPR itself.

For any clarification regarding the processing of personal data, please contact us by writing to: privacy@itscontrollitecnici.it

Who is responsible for processing your personal data?

The Data Controller is ITS CONTROLLI TECNICI S.p.A., with registered office at Via di Torre Rossa 66 – 00165 – Rome. - Tel. +3906881791

For what purposes and on what legal basis do we process your personal data?

Your personal data, whether provided directly or collected as part of the Reporting process, will be processed exclusively for the receipt and management of Reports, as well as for the performance of the resulting actions, in accordance with Legislative Decree 24/2023 and company procedures. The legal basis for such processing is the need to comply with a legal obligation to which the Data Controller is subject (Art. 6(1)(c) of the GDPR).

Data will also be processed where necessary to establish, exercise or defend a right or legitimate interest of ITS or third parties in the relevant forums, as well as for the purposes of internal monitoring of business risks. The legal basis for such processing is the Data Controller's legitimate interest (Art. 6(1)(f) GDPR).

What types of data do we process?

As part of the management of Reports, we may collect both the personal data of the Reporting Party and the personal data of the reported individual (such as first name, surname, address, position held, etc.), as well as any data relating to third parties mentioned in the Report and any further information gathered during the course of the investigation that is necessary to verify the validity of the Report. Furthermore, in the context of managing the Report, we may also process special categories of data, as defined in Article 9 of the GDPR (such as, for example, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as data revealing health or sex life), and we may also process data relating to criminal convictions or offences and related security measures as defined in Article 10 of the GDPR (such as, for example, data relating to entries in the criminal record and pending charges).

Data will be processed exclusively where necessary for the management of the Report, in accordance with the principles of proportionality, relevance, adequacy and necessity set out in the GDPR. The provision of data is optional. The Reporting Party must provide only the data necessary to describe the facts forming the subject of the Report, without disclosing personal data not necessary for the purposes indicated above.

How long do we retain your personal data?

The data will be retained for a period not exceeding that strictly necessary for the purposes for which it was collected or subsequently processed, in accordance with legal obligations.

ITS retains personal data in accordance with the terms set out in Article 14 of Legislative Decree No. 24/2023, i.e. for the time necessary to process the report and, in any event, for no longer than 5 years from the date of notification of the final outcome of the report.

Personal data that is clearly not relevant to the processing of a specific report is not collected or, if collected accidentally, is deleted promptly.

The data will be stored on the servers of our website platform provider located within the European Union

To whom may your personal data be disclosed?

Personal data may be disclosed to parties authorised by ITS to carry out processing operations related to the aforementioned activities.

The data may also be disclosed to third parties (e.g. IT service providers), appointed as “Data Processors” pursuant to Article 28 of the GDPR, for the performance of maintenance and support activities relating to the IT tools used for the management of Reports.

Finally, the data may be disclosed to the competent authorities and other public bodies for the fulfilment of obligations laid down by laws, regulations and EU legislation.

What are your rights regarding the processing of personal data?

At any time, data subjects may contact ITS to obtain full clarity regarding processing operations and to exercise their rights under Articles 15 et seq. of the GDPR. In particular, by way of example, data subjects may exercise the following rights, in accordance with the procedures and within the limits set out in the aforementioned legislation:

- **Right of access:** they may request information regarding the processing operations carried out by ITS or confirmation as to whether or not processing of their personal data is taking place and, if so, obtain access to such data.
- **Right to rectification:** they may request the rectification of data if it is incorrect (for example, because it differs from the data they provided to us, such as when submitting requests), including the right to request the rectification of incomplete data.
- **Right to erasure:** you may request the erasure of the data provided.
- **Right to restriction:** you may request that the processing of the data provided be restricted where the conditions laid down by law apply.
- **Right to data portability:** you may receive your personal data in a structured, commonly used and machine-readable format and transmit it to another controller.
- **Right to lodge a complaint with the Supervisory Authority:** without prejudice to any other administrative or judicial remedy, data subjects have the right to lodge a complaint with the Italian Data Protection Authority (), should they consider that our processing activities breach current data protection legislation.

The exercise of the aforementioned rights may be restricted if such exercise could result in actual and concrete prejudice to the confidentiality of the Whistleblower's identity (Article 13(3) of the Decree and Article 2-undecies of Legislative Decree 196/2006, the so-called "Privacy Code").

You may exercise the aforementioned rights by writing to privacy@itscontrollitecnici.it.

Updated 08/04/2026