

Privacy Policy provided pursuant to Art. 13 of Regulation (EU) 2016/679 concerning the processing of personal data of individuals that report wrongdoing (“Whistleblowing”)

This policy has been provided by Cembre S.p.A. in relation to the processing of personal data carried out through the specific channel for reporting wrongdoing (*Whistleblowing*) If the report is made by a party bound by an employment or collaboration relationship with the company, this notice shall be understood to be in addition to and not in replacement of the policy provided to staff for the management of the employment relationship.

Who are we and what do we do with your personal data?

Cembre S.p.A., with registered offices in Brescia, via Serenissima 9, hereinafter “**Data Controller**” or “**Controller**” or “**Cembre**”, shall ensure the confidentiality of your personal data and provide such data with the necessary protection any events that could put them at risk of violation.

To this end, the Controller shall implement sufficient technical and organisational measures concerning the collection and use of personal data and the exercising of the rights to which you are entitled under the applicable legislation.

What are the legal grounds for the processing?

The Controller shall carry out the processing on the basis of a requirement to **comply with a legal obligation**: the management of the whistleblowing procedure, according to the provisions of Directive (EU) 2019/1937 and the corresponding national transpositions, on the protection of persons who report breaches of Union law and national laws.

What are the purposes of the processing?

The personal data concerning you will be processed for the purpose of ensuring:

- 1)** the correct and comprehensive management of the whistleblowing procedure in compliance with current legislation with regard to whistleblowing;
- 2)** the investigations necessary to verify the veracity of the fact reported and the adoption of the consequent measures;
- 3)** the protection of the Data Controller’s rights during legal proceedings;
- 4)** the fulfilment of a request from legal authorities or other equivalent authorities.

Which personal data are collected?

The Controller collects and/or receives the information that you provide in the report.

The personal data collected consist of the personal details of the whistleblower, the reported person and any other persons mentioned in the report (name, surname, role, telephone number, email).

Only data strictly necessary for the handling of the report will be collected and processed: any personal data provided but not strictly necessary will be deleted and will not be processed.

What happens if you do not provide the data?

According to the “Procedure for Wrongdoing Report Management (Whistleblowing Procedure)”, reports can be submitted by name or anonymously.

In an ‘anonymous reporting’, the whistleblower can omit his/her personal data; however, if the whistleblower does not indicate his/her personal, the Data Controller is unable to guarantee his/her protection from retaliatory acts, and, if the report does not contain all the necessary information, it is impossible to follow it up.

To whom may the data be disclosed?

Access to the personal data of the whistleblower, the reported person and the persons mentioned in the report is normally reserved to the person responsible for handling the reports.

Personal data may be disclosed when involving third parties is necessary to perform the activities relating to the management of the whistleblowing report, in addition to fulfilling certain legal obligations.

In particular, data may be transmitted to:

- a) business functions involved in the receipt, examination and assessment of the reports;
- b) external consultants (e.g., law firms, investigation agencies) who may be involved in the report-related investigation process;
- c) Public Authorities, Legal Authorities, Law Enforcement Agencies;
- d) Corporate Bodies (e.g., Board of Directors, Board of Auditors, Supervisory Board and Anti-Corruption Function).

This applies without prejudice to the provisions of the “Procedure for Wrongdoing Report Management (Whistleblowing Procedure)” on the protection of the confidentiality of the whistleblower, the reported person and the persons mentioned in the report.

Where will your data be transferred?

The Controller will not transfer your personal data overseas or to third countries outside the EU.

How will your data be retained and for how long?

The processing of data concerning you will take place using digital means and tools made available to parties acting under the authority of the Controller who have been authorised and trained for this purpose. These individuals are allowed access to your personal data as far as and within the limits that this is necessary to perform the processing that concerns you.

The Controller, including through individuals authorised for processing, regularly verifies that:

- the technical and organisational security measures relating to the tools with which your data are processed are effective and up to date;
- your data are retained for the time necessary to perform the activities related to the management of the report submitted by you and, in particular, no longer than the time established in advance.

In particular, the personal data collected are retained for a period not exceeding five years, starting from the received date of the Report, as well as for as long as necessary for the conduct of any proceedings arising from the management of the Report (disciplinary, civil, criminal, administrative). This is without prejudice to the possibility of a longer retention period in connection with requests by Public Authorities or the Data Protection Authority, as well as, within the limitation period for claims, in connection with requirements related to the exercise of the right of defence in the event of disputes.

What are your rights?

In accordance with the purposes and limits established for the processing of personal data concerning you, you are entitled to the following rights to allow you to maintain control of your data at all times:

- access;
- rectification;
- erasure;
- restriction of processing;
- objection to processing;
- portability.

Pursuant to article 2-*undecies* of the Privacy Code (in implementation of article 23 of the GDPR), you are hereby informed that the aforementioned rights cannot be exercised by data subjects (by request to the Controller or by complaint pursuant to article 77 of the GDPR) in the event that the exercising of such rights gives rise to an effective and tangible prejudice to the confidentiality of the whistleblower's identity.

For any further information or query please write to: privacy@cembre.com

Where can you lodge a complaint?

Without prejudice to any other administrative or judicial action, if you consider that the processing of your personal data is contrary to the legislation in force, you may lodge a complaint with the competent supervisory authority (Data Protection Authority).