

## **DISCLOSURE ON THE PROCESSING OF PERSONAL DATA OF REPORTING PERSONS (WHISTLEBLOWERS) IN ACCORDANCE WITH ITALIAN LEGISLATIVE DECREE NO. 24/2023**

Marzotto S.p.A. provides hereunder the indications prescribed by the art. 13 of EU Regulation 2016/679 (hereinafter the "Regulation") regarding the processing of personal data carried out by the company itself as part of its "whistleblowing" reporting management procedure, adopted in compliance with Legislative Decree 10 March 2023 no. 24 ("Marzotto Group Whistleblowing Procedure") and, in particular, of all the activities and obligations connected to the functioning of the company system for the management of the reports in this context.

### **DATA CONTROLLER**

The data controller is Marzotto S.p.A. with registered office Largo Santa Margherita 1, 36078 – Valdagno (VI) – Italy – PEC: marzotto@legalmail.it, phone n. 0445/429411 (hereinafter also "Company").

The Data Controller has appointed a Contact Person for the management process of "whistleblowing" reports (hereinafter "Whistleblowing Contact Person") as defined in the aboveindicated procedure.

### **TYPES OF DATA SUBJECT TO THE PROCESSING**

Unless reports are made anonymously, management thereof entails the processing of the reporting person's common data, including personal data, contact data and data relating to professional qualifications, any special data referred to in article 9 of the Regulation and any information communicated by the reporting person, included in the documents attached thereto.

Personal data that are manifestly not useful to process a specific report are not collected or, if accidentally collected, are erased in a timely manner (article 13 of the Decree). Therefore, reporting persons are invited to refrain from communicating personal data unless deemed necessary and essential for the purposes of reporting in compliance with the art. 5 of the Regulation.

### **PURPOSES AND LEGAL BASIS OF THE PROCESSING**

The purpose is the management, processing and analysis of the whistleblowing reports the Company receives via the relevant channel and the subsequent feedback.

The processing is aimed at: i) managing the report, including checking the reported facts, resolving it, preparing the feedback, adopting any compensation or support measures for the reporting persons and possibly instituting proceedings, including disciplinary proceedings and any other related fulfilment; ii) preventing and effectively combating fraud and illegal or irregular activities; iii) supporting the effective application and operation of the Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001 and the Code of Ethics.

The legal basis of the processing includes: a) fulfilling legal obligations, including those set out in Italian Legislative Decree no. 24/2023; b) the legitimate interest of the Controller in establishing and defending legal claims before courts or monitoring bodies; c) in the cases contemplated by the same regulations, a specific and free consent may be requested to the reporting party – pursuant to art. 6, par. 1, letter. a) of the Regulation - and, in particular, where there is a need to reveal the identity, or where the recording of reports collected in oral form via voice messaging systems, or through direct meetings with the Whistleblowing Contact is envisaged.

### **NATURE OF THE PROVISION OF PERSONAL DATA**

The provision of personal data is optional, considering the possibility of forwarding anonymous reports to the Company, where they present precise, consistent and adequately detailed information, without prejudice to the provisions of the law, regarding this case, as far as protection measures to protect the reporting subject are concerned. If provided, the personal data will be processed to manage the report according to the limits and with the guarantees of confidentiality imposed by the relevant legislation.

## **MODALITIES FOR DATA PROCESSING AND CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

Processing is carried out in accordance with the provisions of the law and the “*Marzotto Group Whistleblowing Policy*”, respecting the confidentiality of the identity of the reporting person – without prejudice to article 12 of Italian Legislative Decree no. 24/2023, of the reported person or of the third parties involved, in several respects, in the report, also by adopting appropriate security measures. The reports and the related data may be processed manually and/or using automated IT and electronic tools, including the web platform, even, where appropriate, via voice recording,,by the Whistleblowing Contact Point acting as the Processor (article 28 of the Regulation). Where necessary, as part of the investigation, certain information concerning the report may be processed by other company departments which have been provided with specific written instructions and which are authorised to process personal data.

The third-party provider of the reporting platform acts as the Processor within the meaning of article 28 of the Regulation.

The data collected may also be disclosed to third parties, such as public administrations and, specifically, the police, competent authorities (e.g., ANAC - the Italian national anti-corruption authority, judicial or accounting authorities), and to the Supervisory Body, provided that this is necessary for the purposes of the processing and based on the same conditions for lawfulness indicated.

## **PERIOD OF STORAGE OF PERSONAL DATA**

The data will be stored in accordance with the terms set out in article 14 of Italian Legislative Decree no. 24/2023, i.e., for no longer than is necessary for the time necessary to process the report and, in any case, no longer than five years from the date of communication of the final outcome of the report, without prejudice to the other legal obligations to which the Controller is bound or ANAC’s specific indications.

Personal data that are manifestly not useful to process a specific report are not collected or, if accidentally collected, are erased in a timely manner.

## **DATA TRANSFER TO THIRD COUNTRIES**

The data will not be transferred to third countries outside the European Union and, if they are transferred, the conditions and guarantees provided for by the articles will be respected. 44 and following of the Regulation.

Under no circumstances will personal data be subject to diffusion.

## **RIGHTS OF INTERESTED PARTIES**

Each interested party has the right to exercise the rights referred to in articles 15 and following of the Regulation, in order to obtain from the Data Controller, for example, access to their personal data, the rectification or cancellation of the same or the limitation of the processing that concerns such party, without prejudice to the possibility, in the absence of adequate feedback, to submit a complaint to the Italian Data Protection Authority. These rights can be exercised by contacting the Controller at the addresses indicated.

In this regard, we inform you that the aforementioned rights of those interested in the processing of personal data may be limited pursuant to and for the purposes of the art. 2-undecies of the Legislative Decree. 30 June 2003, n. 196 ("Privacy Code", as amended by Legislative Decree no. 101/2018), for the time and within the limits in which this constitutes a necessary and proportionate measure, if their exercise could result in a concrete and effective prejudice to confidentiality of the identity of the reporting subjects.

In such cases, interested parties will still have the right to contact the Data Protection Authority so that the latter can assess whether the conditions for acting in the manner provided for in Article 160 of the Legislative Decree are met. n. 196/2003.

The Data Controller  
MARZOTTO S.P.A.