



FONDERIE
Cortiana
Cav. Bortolo
s.p.a.

75
years
1946-2021

PRIVACY POLICY

regarding the processing of personal data of individuals who report unlawful conduct

Pursuant to Articles 13 and 14 of European Regulation No. 679/2016 (hereinafter also referred to as the “**GDPR**”), concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data, we provide you with this notice.

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller (hereinafter simply “**Controller**”) of your personal data (hereinafter simply “**Data**”) is Fonderie Cortiana Cav. Bortolo S.p.A. (Tax ID/VAT No. 0015290246) with registered office at Via Vicenza, 15, 36030 San Vito di Leguzzano (VI), certified email: fonderiecortiana@legalmail.it; tel. +39 0445 519111.

2. DATA PROCESSED

The Data subject to processing are as follows:

- Common personal data pursuant to Art. 6 of the GDPR, namely your personal information, where provided, such as: first name, last name, gender, date and place of birth, nationality, tax ID number, postal and/or email addresses, landline or mobile phone number, job title and position, as well as the common personal data of any person involved or mentioned in the Report and the Facilitators;
- Special categories of personal data pursuant to Article 9 of the GDPR, namely information revealing racial origin, religious beliefs, or sexual orientation, where relevant and included in the Report.
- Criminal records pursuant to Article 10 of the GDPR, where included in the report.

3. LOCATION OF DATA PROCESSING

The related processing takes place in Italy, and there is no transfer or disclosure of data abroad or to non-EU countries. No data is disclosed or disseminated, except for statistical purposes and, in any case, in an anonymous and/or aggregated manner.

4. PURPOSES OF DATA PROCESSING

The Data is processed for the following purposes:

- a) receiving and managing the Report in compliance with Legislative Decree 24/2023 and the whistleblowing policy adopted by the Data Controller;
- b) to defend rights during judicial, administrative, or extrajudicial proceedings and in the context of disputes arising in connection with the Report submitted, to take legal action or to assert claims.

5. LEGAL BASIS FOR PROCESSING AND NATURE OF DATA PROVISION

For the purpose referred to in letter a) of the preceding point no. 4, the legal basis for the processing of personal data is the legal obligation to which the Data Controller is subject pursuant to Article 6(1)(c) of the GDPR, arising from the provisions of Legislative Decree 24/2023 or from the provisions of Article 6, paragraph 2-bis of Legislative Decree 231 of 2001 (as amended by Legislative Decree 24/2023). Where the report contains references to special categories of data — since this is unavoidable and necessary for the purposes of the report itself — the legal basis is provided by the provisions of Article 9, paragraph (2) (b) of the GDPR. With regard to judicial data, the processing is authorized by Union or Member State law (Whistleblowing Decree) pursuant to Article 10 of the GDPR.

For the purposes referred to in subparagraph (b) of point 4 above, the legal basis for processing, pursuant to Article 6(1) of the GDPR, is subparagraph (f) — pursuit of the legitimate interests of the Data Controller. In the event that the Report contains references to special categories of personal data because it is unavoidable and necessary for the purposes of the Report itself, the legal basis is found in Article 9(2)(f) of the GDPR.

It should be noted that, in the event of disclosure of the whistleblower's identity in cases provided for by law (for example, to allow the person against whom the report is filed to defend themselves in disciplinary proceedings), such disclosure may occur only with the data subject's prior express consent pursuant to Article 6(1)(a) of the GDPR.

Furthermore, in the case of reports recorded by telephone or via voice messaging systems, the consent of the data subject is required pursuant to Article 6(1)(a) of the GDPR.

The provision of data is optional, as reports may also be submitted anonymously; however, reports that are overly general or lack specific details cannot be effectively processed. Failure to provide the Data therefore does not entail any adverse consequences for the Data Subject, except in cases where specific consent from the reporter is required pursuant to Article 6 of the GDPR (for example: i. the handling of the report requires the disclosure of your name to third parties; ii. the disclosure of one's identity is essential for the defense of the accused in disciplinary proceedings arising from and related to the report, where the charges are based, in whole or in part, on the report itself; iii. storage and documentation are required when a recorded telephone line or another recorded voice messaging system is used for the report, and the report is documented by the designated staff through recording on a device suitable for storage and playback or through a full transcript; iv. at the request of the reporting person, the report is made orally during a meeting with the designated staff and is documented by them through recording on a device suitable for storage and playback or through a written record. In such cases, your refusal to consent to the processing of your data would make it impossible to complete the report, which would therefore have no effect.

6. RETENTION PERIODS

The Company generally retains your personal data for a period no longer than that necessary to achieve the purposes for which they are collected or subsequently processed and, in any case, for no longer than 5 (five) years from the date of notification of the final outcome of the reporting procedure, unless their further processing is necessary for one or more of the following purposes: i) resolution of pre-litigation and/or litigation proceedings initiated before the expiration of the retention period; ii) to follow up on investigations/inspections by internal control functions and/or external authorities initiated before the expiration of the retention period; iii) to follow up on requests from Italian and/or foreign public authorities received/notified to the Company before the expiration of the retention period.

In such cases, the data will be retained for a period not exceeding the achievement of the purposes for which they are processed; during this period, however, appropriate technical and organizational measures will be implemented to protect the rights and freedoms of the data subject.

7. ACCESS TO COLLECTED DATA

Internal access to personal data processed in connection with the investigation of reports is strictly limited to those individuals responsible for investigating whistleblowing reports, who have been duly appointed as data processors pursuant to Article 28 of the GDPR. It is understood that, in line with the principle of protecting the confidentiality of the Whistleblower as set forth in Legislative Decree 24/2023, the sharing of your personal data will be limited to what is strictly necessary to ensure your confidentiality.

8. METHODS OF PROCESSING

Personal data is processed using both automated and manual tools for the purposes indicated above. Specific security measures are observed to prevent data loss, unlawful or improper use, and unauthorized access.

9. RIGHTS OF DATA SUBJECTS

Under certain conditions, you have the right to exercise the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR and, in particular, to request from us:

- access to the Data;
- a copy of the Data you have provided to us (so-called portability);
- correction of the Data in our possession;
- erasure of the Data for which we no longer have any legal basis for processing;
- objection to processing where provided for by applicable law;

- withdrawal of your consent, in the event that processing is based on consent;
- the restriction of how we process your personal data, within the limits set forth by data protection laws.

The exercise of these rights is subject to certain exceptions aimed at safeguarding the public interest (e.g., the prevention or detection of crimes) and our interests (e.g., maintaining professional secrecy). Should you exercise any of the aforementioned rights, it will be our responsibility to verify that you are entitled to do so, and we will generally respond within one month.

Anyone with questions regarding compliance with the privacy policy adopted by Fonderie Cortiana Cav. Bortolo S.p.A., its application, the accuracy of their personal data, or the use of the information collected may contact us via certified email (at the following address: fonderiecortiana@legalmail.it) or by sending a registered letter with return receipt (at the following address: Via Vicenza, 15, 36030, San Vito di Leguzzano (VI)). Furthermore, using the same contact details, you may exercise the rights listed above (governed by Articles 15–22 of the GDPR).

However, if you wish, you may submit your complaints or reports, pursuant to Article 77 of the GDPR, to the data protection authority, using the relevant contact information: Garante per la protezione dei dati personali – Piazza Venezia n.11 - 00186 ROME - Fax: (+39) 06.69677.3785 - Phone: (+39) 06.696771 - Email: garante@gpdp.it - Certified email: protocollo@pec.gpdp.it.

Please note that, in accordance with Article 13 of Legislative Decree No. 24/23, the rights referred to in Articles 15–22 of the GDPR may be exercised within the limits prescribed by Article 2-undecies of Legislative Decree 196/2003 (“Privacy Code”), meaning they may not be exercised if doing so could result in actual and concrete harm to the confidentiality of the whistleblower’s identity. In such cases, the rights in question may be exercised through the Data Protection Authority in accordance with the procedures set forth in Article 160 of the Privacy Code.