











WHISTLEBLOWING – Privacy Notice pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)

	<p>In accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR), we hereby provide the required information regarding the processing of personal data provided. This Privacy Notice is issued pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR).</p> <p>CATEGORIES OF PERSONAL DATA PROCESSED The personal data subject to processing fall within the following categories:</p> <p>Personal data of the reporting person in the event of non-anonymous reports submitted through the dedicated platform</p> <ul style="list-style-type: none"> - Mandatory personal data: first name, last name, type of relationship with the Company; - Optional personal data: job classification, role, position, telephone contact details, email address. <p>Personal data of the reporting person in the event of non – anonymous reports submitted through channels other than the platform In the case of reports made verbally by telephone or during a specific meeting upon request, the personal data processed are those voluntarily provided by the reporting person.</p> <p>Personal data relating to the reported person(s) and/or other individuals involved in the report The data that may be processed are those that the reporting person has chosen to provide in order to describe the facts reported. In such cases, the Company is not able to determinate in advance the personal data included in the report, which may therefore also include special categories of personal data or data relating to criminal convictions and offences.</p> <p>The aforementioned data shall be processed using electronic and paper-based tools designed to ensure their security and confidentiality. Paper documentation is limited to what is strictly necessary and is archived and stored in cabinets and premises equipped with security locks. The transmission of data provided by the reporting person through the platform is managed via the HTTPS protocol. In addition, end-to-end encryption techniques are applied to all data in transit and at rest, thereby ensuring the confidentiality of the transmitted information. No cookies are used for the transmission of personal information, nor are persistent cookies used for user tracking purposes. Only technical cookies are used, strictly to the extent necessary for the proper and efficient operation of the platform. The use of session cookies (which are not stored persistently on the user’s device and are deleted when the browser is closed) is strictly limited to the transmission of session identifiers (consisting of randomly generated numbers created by the server), which are necessary to enable secure and efficient navigation of the platform.</p>		
	<p>DATA CONTROLLER, pursuant to Article 4 of Regulation (EU) 2016/679 (GDPR), is SO.DI.CO S.r.l., with registered office at Via Lorenzo Mascheroni no. 31, Milan, and operational headquarters at Via Sterpettine 38, 61037 Mondolfo (PU), Italy, Tel. +39 071 6610060 – +39 071 6610226, acting through its legal representative pro tempore.</p>		
 <p>PURPOSES OF THE PROCESSING</p>	 <p>LEGAL BASIS</p>	 <p>DATA RETENTION PERIOD</p>	 <p>NATURE OF DATA PROVISION</p>
<p>A) <u>Conduct of investigative activities and adoption of measures</u></p> <p>Your personal data shall be processed for the purpose of carrying out the necessary investigative activities aimed at verifying the validity of the facts reported and adopting any measures that may be deemed necessary.</p>	<p>Pursuant to Article 6 (1)(b) of the GDPR, the processing is necessary for compliance with a legal obligation to which the Data Controller is subject, pursuant to Law No. 179/2017 and Legislative Decree No. 24/2023 implementing Directive (EU) 2019/1937</p>	<p>Your personal data shall be retained for a period of time no longer than is necessary to achieve the purposes for which they were collected, in accordance with applicable legal obligations or, in any case, for the time required to allow the Company to protect its own rights and interests or those of third parties (e.g. in the event of legal proceedings). The data shall be automatically deleted five (5) years after the closure of the report.</p>	<p>The provision of personal data is voluntary; however, it is understood that any refusal to provide the requested information at the time of collection, or any objection to the processing of personal data, may result in the Company being objectively unable to proceed with or properly handle the report submitted by you.</p>

	<p>RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE DATA</p> <p>For the purposes set out above, the personal data provided may be made accessible solely to those individuals within the Company who need to access such data due to their role and duties in connection with the receipt, analysis, investigation and management of reports and any related follow-up actions.</p> <p>Such individuals are appropriately instructed and trained in order to prevent data loss, unauthorized access or unauthorized processing of personal data and, more generally, to ensure compliance with data protection obligations.</p> <p>Personal data may also be processed by external consultants and third parties providing technical services (for example, the IT platform provider), acting as Data Processors and/or Sub-Processors, who have entered into specific agreements governing the processing activities entrusted to them and the related data protection and security obligations, pursuant to Article 28(3) of the Regulation.</p> <p>Finally, personal data may also be disclosed to other independent Data Controllers, where required by law or regulation (e.g. Public Authorities, Judicial Authorities, the Court of Auditors and ANAC).</p>
	<p>TRANSFER OF DATA TO A THIRD COUNTRY</p> <p>Your personal data will not be transferred outside the European Union (EU)</p>
	<p>RIGHTS OF DATA SUBJECTS</p> <p>Pursuant to Articles 15 to 22 of Regulation (EU) 2016/679 (GDPR), data subjects are granted specific rights. In particular, with regard to the processing of personal data covered by this Privacy Notice, data subjects have the right to request from the Company access, rectification, erasure, restriction, objection, and data portability. They may also lodge a complaint with the competent supervisory authority, which in Italy is the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), pursuant to Article 77 of the GDPR. Pursuant to Article 2-undecies of Legislative Decree No. 196/2003, as amended (the “Privacy Code”) implementing Article 23 of the GDPR, it is hereby informed that the aforementioned rights may not be exercised by certain individuals involved in the report (e.g., the reported persons and/or other individuals involved) where the exercise of such rights could result in a real and concrete prejudice to the confidentiality of the reporting person’s identity.</p> <p>In particular, the exercise of such rights:</p> <ul style="list-style-type: none"> • shall be carried out in accordance with the provisions of applicable laws or regulations governing the sector (including Legislative Decree No. 231/2001, as amended by Law No. 179/2017); • may be delayed, restricted, or excluded with a reasoned notice provided without undue delay to the data subject, unless such communication would compromise the purpose of the restriction, for the duration and to the extent that this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the data subject, in order to safeguard the confidentiality of the reporting person’s identity; • in such cases, the data subject may also exercise their rights through the Garante, pursuant to Article 160 of the Privacy Code, in which case the Garante will inform the data subject that all necessary checks or reviews have been carried out, as well as their right to seek judicial remedy. <p>At any time, data subjects may exercise their rights by contacting SO.DI.CO S.r.l. at the following email address: info@sodico.it</p>
	<p>PRIVACY NOTICE UPDATES</p> <p>The Data Controller reserves the right, at its sole discretion, to change, modify, add to, or remove any part of this Privacy Notice at any time. To facilitate the verification of any changes, the Privacy Notice will indicate the date on which it was last updated.</p>

Last update 19/12/2025

Data Controller – SO.DI.CO SRL