

	<p>DATA CONTROLLER</p> <p>The Data Controller is Industrie Cartarie Tronchetti S.p.A. (ICT) with registered office in Piano della Rocca, Borgo a Mozzano - 55023 - (LU), tax code and VAT number IT00366330462.</p> <p>The company can be reached at the following e-mail address: privacy@ictit.eu and at the above-mentioned address.</p>
	<p>PERSONAL DATA PROCESSED</p> <p>Depending on the content of the reporting person's report, the Company may process common personal data and data of a special nature (Art. 9 of the GDPR) or relating to criminal convictions and offences (Art. 10 of the GDPR), referred to hereinafter collectively as "Personal Data" of the reporting person, the person reported, the persons concerned by the report, facilitators, etc.</p> <p>Common personal data may be: first name and surname, other information, such as telephone number, e-mail address, postal address, address of residence or domicile, job title, etc.</p> <p>Personal data belonging to special categories may be: data on racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health or sex life.</p> <p>Personal data relating to convictions or offences may be information on pending criminal proceedings or sentences imposed that is relevant and necessary for the proper handling of the report.</p>

**INFORMATION PROVIDED PURSUANT TO ARTICLES 13 and 14 OF REGULATION (EU) 2016/679 ("GDPR")
Reporting offences - "Whistleblowing"**

	<p>SOURCE OF THE PERSONAL DATA</p> <p>The Personal Data being processed are provided by the "Reporting Person", i.e. the person who makes an internal or external report or public disclosure of information on violations acquired in the context of his or her work.</p>
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 PURPOSE OF THE PROCESSING	 LEGAL BASIS OF THE PROCESSING AND NATURE OF DATA PROVISION	 MEANS OF DATA PROCESSING AND RETENTION PERIOD
<p>The Personal Data are collected and processed for purposes strictly connected with and instrumental to the verification of the validity of the reports received and for the management thereof, in relation to activities and/or conduct that do not comply with the procedures implemented by the Company, meaning the violation of the principles of ethics referred to by current internal and external regulations and/or unlawful or fraudulent conduct attributable to employees, members of corporate bodies, Group companies or third parties (clients, suppliers, consultants, collaborators), which may result - directly or indirectly - in economic, financial and/or reputational damage.</p> <p>“Special” categories data within the meaning of Art. 9 and pursuant to art. 10 of the GDPR, which may be provided by the Reporting Person, may be processed only in the following cases:</p> <p>→ for the defence of a right in court and whenever it is necessary to determine, exercise or defend a right of the Controller;</p>	<ul style="list-style-type: none"> ❖ Fulfilment of a legal obligation to which the Data Controller is subject, which is obliged, pursuant to (It.) Legislative Decree of 10 March 2023 no. 24 and (It.) Legislative Decree of 8 June 2001 no. 231, to have a channel for receiving and handling reports received (Articles 6 par. 1(c) and 9 par. 2(b) of the GDPR). ❖ Determination, exercise or defence of a right in court or whenever the judicial authorities exercise their functions (Art. 9, par. 2(f) of the GDPR). <p>The identity of the reporting person and any other information from which that identity may be inferred, directly or indirectly, may not be disclosed, without the express consent of the reporting person, to persons other than those responsible for receiving or following up the reports, expressly authorised to process such data pursuant to Articles 29 and 32(4) of the GDPR and Article 2-quaterdecies of the (It.) Personal Data Protection Code laid down in (It.) Legislative Decree of 30 June 2003, no. 196.</p> <p>If the charge is based, in whole or in part, on the report and knowledge of the identity of the person making the report is indispensable for the defence of the accused, the report will only be usable for the purposes of disciplinary proceedings only if the person making the report expressly consents to the disclosure of his or her identity (Art. 6, par. 1(a) of the GDPR).</p>	<p>The processing of Personal Data is carried out on paper or in electronic form in accordance with Art. 32 of the GDPR on security measures.</p> <p>The reports received and the supporting documentation are kept, by the Company’s Whistleblowing Committee, in special archives, subject to the adoption of all appropriate precautions to ensure maximum confidentiality.</p> <p>Without prejudice to specific legal provisions, as well as to the specific competences of the Company’s supervisory bodies, such as the Board of Statutory Auditors, access to the Personal Data relating to whistleblowing reports is allowed exclusively to the Whistleblowing Committee, limited to reports falling under its purview.</p> <p>Details on the whistleblowing process are available in the “Whistleblowing Policy” adopted by the Company, which can be found at the following link www.ictgroup.net/whistleblowing/ictspa.</p> <p>The Personal Data will be kept for a period of time no longer than is necessary for the purposes for which they were collected and processed and, in any case, for no longer than five years from the filing of the report following the completion of the verification and investigation activities carried out, except in the event that judicial and/or disciplinary action is taken</p>

→ to comply with requests by the competent administrative or judicial Authorities and, more generally, by public bodies, in compliance with the formalities laid down by Law.

The provision of the Personal Data is **optional**; however, failure to provide them may, in some cases, jeopardise the proper handling of the report.

against the reported person or the person reporting the matter who made false or defamatory statements or statements in bad faith; in such cases, the Personal Data may be retained until the judicial and/or disciplinary proceedings are finally concluded. Subject to the exceptions mentioned above, after the five-year period, the report and its documentation must be deleted.

After the aforementioned retention periods have expired, the Personal Data will be deleted.



RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

Access to the Personal Data processed within the framework of the management of reports is allowed exclusively to the Whistleblowing Committee, appointed by the Company for the management of reports pursuant to (It.) Legislative Decree no. 24/2023. Reports may also be forwarded to the Supervisory Body, limited to reports falling within its competence, as further detailed in the “Whistleblowing Policy”.

Subsequently, where necessary for the handling of the report, the determination and investigation phase, the Personal Data may be disclosed to natural persons authorised to process the Personal Data. The disclosure shall only concern the Personal Data necessary for the performance of the tasks entrusted to the authorised persons and/or persons appointed as Data Processors (corporate departments when, due to the nature and complexity of the checks, their involvement and/or that of external consultants is necessary).

The Personal Data collected may be disclosed to the persons to whom this communication is to be made in compliance with a legal obligation, a regulation or EU legislation, where this is required, for instance, for any subsequent criminal proceedings or if the reporting person has made a false statement.

In compliance with the provisions of (It.) Legislative Decree 24/2023, if, at the outcome of the preliminary investigation, the report does not prove to be manifestly unfounded, the Whistleblowing Committee - in relation to the profiles of unlawfulness found and the contents of the report - identifies the persons to whom the report should be forwarded, simultaneously notifying the reporting person.

As set forth in Art. 5 of (It.) Legislative Decree 24/2023, the Company has activated an internal reporting channel that enables the receipt and management of reports and guarantees, also through the use of encryption tools, the confidentiality of the identity of the person making the report, the person involved and any person mentioned in the report. The service is provided by a third-party company with which the Company has stipulated a service contract and which has been formally appointed as Data Processor, pursuant to Art. 28 of the GDPR.



TRANSFER OF THE PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION

No transfers of Personal Data outside the European Union are envisaged. Should it be necessary for the Controller's specific needs to transfer the Personal Data to countries outside the EU, the Controller undertakes to ensure adequate levels of protection and safeguards in accordance with the applicable rules, including the conclusion of standard contractual clauses.



RIGHTS OF THE DATA SUBJECT

The data subject (as reporting person, reported person, witness, etc.) may exercise, in relation to the processing of the Personal Data described herein, the **rights envisaged by the GDPR** (Articles 15-21 and 77), including:

- receiving confirmation of the existence of his or her personal data and access to their content (**right of access**);
- update, amendment and/or correction of his or her personal data (**right to rectification**);
- requesting the erasure or restriction of data processed in breach of the law, including data whose storage is not necessary in relation to the purposes for which the data were collected or otherwise processed (**right to be forgotten and right to restriction**);
- objecting to the processing (**right to object**);
- **revoking consent**, where given, without prejudice to the lawfulness of the processing based on the consent given before revocation;
- **lodging a complaint** with the Supervisory Authority in the event of a breach of personal data protection rules;
- receiving a copy in electronic form of the data concerning him or her, provided in the context of the employment contract and requesting that such data be transmitted to another data controller (**right to data portability**).



The data subject's rights may be restricted pursuant to Art. 2-undecies, first paragraph, letter f) of (It.) Legislative Decree no. 196/2003, as amended by (It.) Legislative Decree 101/2018, and in accordance with Art. 23 of the GDPR, if the exercise of the aforementioned rights may result in concrete and actual prejudice to the confidentiality of the identity of the reporting person.

The assessment of the necessity to restrict the data subject's rights is left to the Data Controller, who shall make use of the relevant competent roles.

In such a case, the Data Controller must provide reasoned notice to the data subject without delay of the rejection/delay/limitation/exclusion of the request to exercise the aforementioned rights, without prejudice to the provisions of Art. 2-undecies, paragraph 3 of (It.) Legislative Decree 196/2003, as amended by (It.) Legislative Decree 101/2018.

Where access is granted to the Personal Data of a data subject, the Personal Data of third parties, such as reporting persons, reported persons or witnesses, must be removed from the documents, except in exceptional circumstances (if the reporting persons authorise such disclosure, if this is required by any subsequent criminal proceedings, or if the reporting person has made an intentionally false statement).

WAYS OF EXERCISING THE RIGHTS

In order to exercise the rights described in the preceding paragraph, the data subject may contact the Data Controller at the addresses given above.