

This information notice is addressed to the authors of reports, to the natural persons who assist the whistleblower in the reporting process (so-called facilitators) and lastly to the natural persons to whom the information content of the report may refer as reported persons or persons involved in various ways in the reported events.

To this end, Industrie Celtex S.P.A., as data controller, would like to advise pursuant to Articles 13 and 14 of the General Data Protection Regulation EU 2016/679 (hereinafter also referred to as "GDPR"), that the personal data acquired as part of the reporting procedure will be processed in the following manner and for the following purposes.

Data Controller	The data controller is Industrie Celtex S.P.A. with registered office in Altopascio, Via Traversa del Marginone, 12/23 Montecarlo (LU) - email privacy@celtex.it
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The following types of personal data may be processed:

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| Type of data
processed | <ul style="list-style-type: none">– identification and contact details of the whistleblower;– identification data of the persons involved in the report, information and data relating to the reported breaches, including any personal data relating to special categories or relating to criminal convictions and offences;– the voice of the whistleblower (in the case of voice messages)– any other information relating to the whistleblower, the persons involved in the report and any other third parties that the whistleblower decides to share to better describe the suspected breach;– identification, contact and account data for access to the IT platform of the persons in charge of handling reports. |
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Origin of the data and nature of the conferment	The personal data to be processed are those provided by the whistleblower and those that may be collected independently in the course of the investigative activities, which are necessary to ascertain the circumstances that are the subject of the report. The provision of data is necessary and functional for the handling of reports received in the form and manner described in the Whistleblowing Procedure.
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Purpose of the processing	The personal data will be collected and processed for purposes related to the handling of reports of violations concerning: i) violations relevant to regulation 231/2001 or violations of organisational models; ii) national and European legislation relating to sectors and interests relevant to the Union (for details, please refer to the procedure);
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Legal basis	The data processing stems from the need to apply the provisions of (It.) Legislative Decree no. 24/2023 as well as those provided for in the organisation and management model pursuant to (It.) Legislative Decree no. 231/2001 and the code of ethics.
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Retention times	The reports and the related documentation shall be kept for as long as necessary to process the report and in any case for no longer than five years from the date of the communication of the final outcome of the reporting procedure, subject to the obligations regarding the confidentiality of the whistleblower. Personal data that are clearly not useful for the evaluation of the report will be erased immediately.
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Recipients of the personal data	In particular, the Report Management Structure and any internal actors involved in the investigation work with the specific authorisation of the Data Controller and on the basis of instructions from the latter.
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The IT platform for the management of reports is managed by the company Ablex S.r.l., with registered office in Via Giacosa 38- 10122 Turin (TO), designated as data processor. The platform's encryption system does not grant the processor access to the identity of the whistleblower or to the content of the reports. Lastly, some data may be transmitted, in the cases provided for by the law, to the Judicial Authorities and/or to the competent Authorities.

Rights of the data subject

With regard to such data, the Data Subjects may exercise their rights under CHAPTER III of Regulation (EU) 2016/679 (GDPR) in the cases provided for. In particular, the whistleblower may exercise his or her right to access his or her data, to rectify or supplement them, to have them erased and to restrict processing in the same way as he or she made the report. The whistleblower, pursuant to Art. 77 of the GDPR, also has the right to lodge a complaint with the Italian Data Protection Authority if he or she considers that the processing violates the aforementioned Regulation. Please note that the exercise of the aforementioned rights by other data subjects, such as the reported person or other involved persons, may be delayed, limited or excluded if such exercise may result in an effective and concrete prejudice to the confidentiality of the identity of the whistleblower as provided for in Article 2-undecies, letter f of the (It.) Privacy Code (implementing Article 23 of the GDPR). In such cases, the aforementioned rights may be exercised through the National Data Protection Authority, in the manner set out in Article 160 of the (It.) Privacy Code.