

PRIVACY POLICY - WHISTLEBLOWING Legislative Decree 24/2023

Information document pursuant to Article 13 GDPR for the reporting entity

1. DATA CONTROLLER

The Data Controller, pursuant to articles 4 and 24 of EU Reg. 2016/679 pursuant to articles 4 and 24 of EU Reg. 2016/679, is Tecno-Gaz spa in the person of its pro-tempore legal representative Strada Cavalli, 4 - 43038 Sala Baganza (PR) Italy tel+39 0521 83.80 mail: privacy@tecnogaz.com

2. DATA PROTECTION OFFICER. The figure of the Data Protection Officer (DPO) has not been identified as a mandatory condition provided for by Article 37 c.1 of EU Reg. 2016/679

3. TYPE OF DATA THAT CAN BE PROCESSED

"Personal data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological or physical identity of that natural person, genetic, mental, economic, cultural or social.

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, limitation, erasure or destruction.

With reference to the processing covered by this policy, the personal data processed will be those relating to reports made by whistleblowers, including the contents relating to the reports themselves, which may include personal data relating to third parties.

Personal data processed by the person making the report (the "whistleblower"), in the event that the report is not made anonymously (**the data are to be defined according to the type of information that will be requested in the report form**):

- ✓ Name, title, title, gender;
- ✓ Business contact information: e.g., telephone (mobile) number, email address, work address, fax number;
- ✓ Employment relationship (e.g., type of contract and place of work);
- ✓ Method and time of reporting (including the site of origin);
- ✓ Other information provided by the data subject (personal opinions, consequences suffered due to alleged violations, etc.)

The interested parties are: a) employees (persons who have entered into an employment contract with the employer, including temporary workers), b) top management and representation of the company and persons delegated by the company to perform tasks that involve the use of the company's name and that may influence its management and control, c) workers such as subcontractors/subcontractors, consultants, employees of employment agencies or similar, d) third parties such as employees of the public and private sector, who interact with the Data Controller by virtue of a contract, including workers, public officials, self-employed workers, employees of subcontractors/subcontractors, shareholders, persons part of the administrative, management or supervisory bodies of the company, including any non-executive members, volunteers, trainees, former employees and candidates for employment, e) relatives: persons in the same working context as the reporting person who are linked to him by a stable emotional or family relationship within the fourth degree.

TECNO-GAZ S.p.A

Capitale Sociale € 280.000 i.v.
Partita IVA IT00570950345 R.E.A. PR 138927
Iscrizione al Registro delle Imprese di Parma e Codice Fiscale
00570950345

tel. +39 0521 83.80
fax +39 0521 83.33.91
info@tecnogaz.com
www.tecnogaz.com



3. PURPOSE, LEGAL BASIS OF THE PROCESSING, DATA RETENTION PERIOD AND NATURE OF THE PROVISION

The personal data provided will be processed in compliance with the conditions of lawfulness pursuant to Article 6 of EU Reg. 2016/679 (GDPR) for the following purposes:

- A) RECEIPT AND MANAGEMENT OF REPORTS** and/or communications of which you have become aware in the context of a legal relationship, pursuant to Article 3 of Legislative Decree no. 24/2023.

LEGAL BASIS:

The processing is necessary to comply with a legal obligation to which the Data Controller is subject (Legislative Decree 24/2023).

RETENTION PERIOD:

For the time strictly necessary to process the report and, in any case, no later than 5 years from the date of communication of the final outcome of the reporting procedure (Article 14 of Legislative Decree no. 24/2023).

NATURE OF THE CONTRIBUTION:

The provision of the personal data subject to the communication is mandatory, as it is essential in order to be able to comply with the related legal obligations (Legislative Decree 24/2023 and MOGC, Legislative Decree 231/2001).

Please note that, in the event that the report is made anonymously, no personal data of the reporting party will be processed.

- B) DISCLOSURE OF THE IDENTITY OF THE WHISTLEBLOWER** and/or of any other information from which such identity may be inferred, directly or indirectly, to persons other than those competent to receive and follow up on the report, pursuant to Article 12, paragraph 2, of Legislative Decree no. 24/2023.

LEGAL BASIS:

The processing is based on consent to the processing of personal data

RETENTION PERIOD:

For the time strictly necessary to process the report or until consent is revoked, unless the identity of the whistleblower has already been communicated.

NATURE OF THE CONTRIBUTION:

The provision of personal data by the whistleblower is optional and failure to provide them will not affect the report.

4. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF DATA

The data will not be disseminated; instead, they may be communicated to recipients, who will process the data in their capacity as data processors and/or as natural persons acting under the authority of the Data Controller and the Data Processor, for the purposes listed above.

The following are the recipients identified:

- the person or the internal office, or the external party, who is entrusted with the management of the internal reporting channel.
- third parties for the management of the platforms for sending and/or managing reports;
- Judicial authorities and public authorities, including ANAC.

Headquarters | Headquarters
Strada Cavalli, n. 4
C.A.P. 43038 Sala Baganza
Parma, Italia

Plant 2 Factory
Via VIII Marzo, n.4
CAP 42025 Cavriago
Reggio Emilia, Italia

Magazzino | Warehouse
Via Aldo Moro, n.9
CAP 43038 Sala Baganza
Parma, Italia

Accademia |Academy
Via Aldo Moro, n.19/2
CAP 43038 Sala Baganza
Parma, Italia

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**5. TRANSFER DATA VERSE A COUNTRY THIRD and/or AN INTERNATIONAL ORGANIZATION AND GUARANTEES**

The personal data collected will not be transferred to countries outside the EEA.

6. RIGHTS OF THE DATA SUBJECTS

You may assert your rights as expressed in Articles 15 et seq. of the GDPR, by contacting the Data Controller at the privacy@tecnogaz.com e-mail address or at the contacts indicated above. You have the right, at any time, to ask the Data Controller for access to your personal data (art. 15), rectification (art. 16) or deletion (art. 17) of the same, or limitation of processing (art. 18)

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The Data Controller communicates (art. 19) to each of the recipients to whom the personal data have been transmitted any rectification or deletion or restriction of processing carried out.

The Data Controller shall notify the data subject of these recipients if the data subject so requests. You also have the right to the portability of your data (art.20) and in this case they will be provided to you in a structured, commonly used and readable format, by an automatic device.

In the event that the data subject believes that the processing of personal data carried out by the Data Controller is in violation of the provisions of Regulation (EU) 2016/679, the data subject has the right to lodge a complaint with the Supervisory Authority, in particular in the Member State in which he/she habitually resides or works or in the place where the alleged violation of the Regulation occurred (Data Protection Authority <https://www.garanteprivacy.it>), or to take legal action.

Last updated: 13/11/2023

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