

Information pursuant to arts. 13 and 14 of Regulation (EU) 2016/679 and the domestic regulations governing the protection of personal data (together, “Data protection regulations”) - Whistleblowing

Identity and contact details of the Controller and the DPO

Barilla G. e R. Fratelli Società per Azioni, with registered office at Via Mantova 166, Parma, Italy (hereinafter, “**Barilla**”), privacy-Italy@barilla.com, and the Barilla group company, meaning any legal person, present or future, being a direct or indirect subsidiary of Barilla Holding S.r.l., with registered office at Via Mantova 166, 43122 Parma, Italy, as listed in [Annex A](#), which also includes contact details in addition to those provided below, involved in each case by the report (hereinafter “**Group Company**”), as independent controllers (altogether, the “**Barilla Group**”), process personal data linked to reports of unlawful phenomena and alleged conduct that might represent an infringement of the policies and procedures of the Barilla Group and of Barilla, as well as of the rules of conduct contained in the Code of Ethics of the Barilla Group and Management Model of Barilla (hereinafter, “**Whistleblowing Report**”) in compliance with the Data protection regulations and, in particular, Regulation (EU) 2016/679 (hereinafter, “**GDPR**”) and EU Directive 1937/2019, as duly transposed into the applicable domestic legislation (hereinafter, “**Whistleblowing Regulations**”).

The contact details of the DPO appointed by Barilla are: dpo@barilla.com.

Personal Data processed

The personal data (hereinafter, “**Personal Data**”) processed may include, should the reporter decide to reveal his/her identity, the identification details of the reporter (such as, in particular, name, surname, e-mail address, telephone number, any working relationship with Barilla, and any and all other information provided in the context of the Whistleblowing Report), as well as the identification details of the reported party and the names of other parties who are able to comment on the facts addressed by a Whistleblowing Report, together with all other information and facts linked to the Whistleblowing Report that may be obtainable, even from documents and files attached to such report.

In addition, in the context of the reports made, certain data provided may be included in the so-called “special categories of personal data” pursuant to art. 9 GDPR (such as data capable of revealing racial and ethnic origin, beliefs of a religious, philosophical or other nature, political opinions, membership of political parties, trade unions, associations or organizations of a religious, philosophical, political or union-related nature, as well as personal data capable of revealing the state of health or sex life of the individual) and in the so-called “judicial data” category pursuant to art. 10 GDPR (such as data relating to criminal convictions and offenses). In general, the reporter is invited to avoid providing those categories of his/her or third-party data, unless strictly necessary for the purposes of the Whistleblowing Report.

Source of Personal Data

The identification details of the reporter are collected directly from the data subject, except when the Whistleblowing Report is submitted anonymously. Any other data (contents of the report, identity of the reported party, etc.) not provided directly by the reporter may also be collected from third parties (including, for example, any parties able to comment on the facts addressed by the report).

Purposes of processing and legal basis

Personal Data is therefore processed in order to:

- manage the Whistleblowing Report: the data is processed for the purposes of receiving, analyzing and administering the Whistleblowing Report. In this case, processing is carried out in compliance with the legal requirements specified in the Whistleblowing Regulations; however, solely in the case of verbal reports, these are only recorded following consent from the reporter;
- share the identity of the reporter: reveal his/her identity to parties other than those indicated below and/or in the procedure adopted by Barilla Group, should this be necessary for the proper and complete administration of the Whistleblowing Report in accordance with the Whistleblowing Regulations. Processing in this case is based on consent from the data subject, requested where applicable as part of work to administer the Whistleblowing Report, and may be revoked at any time without affecting the lawfulness of any processing carried out previously;
- prevent and repress unlawful deeds and conduct in contrast with the above policies and procedures, including by taking disciplinary action, as well as safeguard the rights and legitimate interests of the controller and/or third parties, even in court. Processing in this case is based on the legitimate right of Barilla to safeguard its interests, whether in or out of court, or via disciplinary action and penalties, including measures envisaged in the Whistleblowing Regulations.

Methods used to process Personal Data

For the purposes indicated, Personal Data is processed using electronic and, where applicable, IT equipment applying logic strictly correlated with such purposes, and may include any type of operation such as, without limitation, collection, consultation, deletion and erasure. The level of security provided is deemed adequate, having regard for the risks that might derive from the loss, erasure, amendment, unauthorized disclosure of, accidental or illegal access to, or abuse or alteration of the Personal Data.

Retention of Personal Data

Consistent with the provisions of the section entitled “Purposes of processing and legal basis” and in compliance with the processing principles of necessity and proportionality, Personal Data is processed for a period not exceeding five years from the date of communicating the final outcome of the work to administer the Whistleblowing Report, except if a court case is initiated.

Provision of Personal Data

The provision of Personal Data for the purposes indicated in the section entitled “Purposes of processing and legal basis” is optional. In particular, with regard to the identification details of the reporter, an option exists to submit anonymously the Whistleblowing Report, which will be taken into consideration and analyzed just the same; with reference to the identity of the reported party, the provision of his/her data is also optional but, in that case, the Whistleblowing Report might be ignored if the minimum information needed to proceed is not available.

Recipients of Personal Data

Access to the Personal Data may be granted to certain Barilla personnel, as identified in the Corporate Whistleblowing Policy and the Local Whistleblowing Policies that should be consulted; such personnel are duly authorized and assigned responsibility for administering the report. In particular, the administration of Whistleblowing Reports is assigned:

- depending on the Group Company concerned, to the Legal Compliance and Group Internal Audit functions of Barilla, or to a Local Whistleblowing Committee (comprising members internal to Barilla, such as: representatives of the Regional HR, Legal Compliance or Group Internal Audit functions, and a Regional Lawyer), responsible both for preliminary assessment of the credibility and reasonableness of reports, and for subsequent administration of those that fall within the scope of their responsibilities.

- to a Group Ethics and Compliance Committee or to local collegiate bodies (e.g. Supervisory Body), responsible for administering reports and carrying out investigations in their regard.

When the above corporate functions or committees are involved, access to the Personal Data may be granted to personnel employed by the Group Company that is the Controller or otherwise involved in the report, as well as to persons employed by other Group Companies in the same Region, or by Barilla.

Access to the Personal Data may also be granted to the provider of the telephone and web reporting platform, duly appointed as a processor, for the purpose of activating and maintaining the telephone and web reporting platform, as well as - solely with regard to the telephone channel - for the purpose of receiving and transcribing the report and assisting the reporter.

Lastly, the Personal Data may be communicated, at their request for the above purposes, to consultants, lawyers and professional firms that provide legal advice to Barilla, as well as to the competent public authorities (including the courts) that will process it as independent controllers.

In accordance with the applicable regulations, the identity of the reporter will only be disclosed if this is a legal requirement, e.g. in the context of investigations by the competent authorities or in the case of court proceedings, not least to safeguard the defense rights of the reported party.

Transfer outside of the EU

Personal Data is transferred to third countries outside of the European Union, including the United States of America. For that purpose, in accordance with the privacy regulations, the impact of such transfer has been assessed and, as adequate guarantees, Standard Contractual Clauses have been signed with the provider that administers the reporting platform and with the external consultant on the Ethics Committee.

Barilla may also transfer Personal Data to the Group Company involved in each case, even if located outside of the EU; in this case too, the transfer is based on the Standard Contractual Clauses adopted to govern transfers within the Barilla Group.

Rights of data subjects

As the data subject, you may exercise at any time the rights granted in art. 15 et seq. GDPR (e.g. access, amendment, objection, erasure, portability, restriction) by writing to the e-mail addresses specified in the first section or in [Annex A](#), as well as the right to lodge a complaint with the competent personal data protection authority.

☐ ACKNOWLEDGEMENT OF THE INFORMATION PROVIDED

I have read and understood the information provided above about the processing of my personal data. By clicking on "Continue", I confirm that my report is made in good faith and, in my opinion, reasonably corresponds to the truth.