

WHISTLEBLOWING PRIVACY NOTICE

pursuant Articles 13 e 14 of Regulation (EU) n. 679/2016 ("GDPR")



Data Controller

Bolton Group S.r.l., with registered office at via G.B. Pirelli 19, 20124 Milan, VAT no. 05983890152 and, where applicable, the companies of Bolton Group, by which it is meant any legal entity, present or future, which is directly or indirectly controlled by Bolton Group S.r.l, involved in the reporting, (all, collectively, the "**Bolton Group**") are the data controllers of the processing of your personal data (hereinafter, the "**Controller**").

The Data Controller can be contacted at the following e-mail address: dpo@boltongroup.it



Source of your personal data

Your personal data will be collected directly from you or, in the case of reported persons, acquired through reports made by third parties and during investigations that may result from them.



Categories of personal data

With reference to the **whistleblower's** personal data, reports of crimes or irregularities can also be made anonymously. However, in case you decide to confer your personal data for the purpose of your reporting, the Controller will process your **personal details** (first name, last name, address, telephone number, email and other contact details) and, in general, all further **information that will be received as part of your statement** for the sole purpose of handling this report and the related investigations. Depending on the report received and the subject of the subsequent investigation, the Controller may also process special categories of personal data.

With regard to the **signaled person**, the Controller will process the **personal data indicated in the statement**, as well as the information acquired in the course of **subsequent investigations** (e.g., name, surname, job title, subject of the report, alleged unlawful act).

Please note that, in the cases provided for by the Whistleblowing Regulation, as defined below, reports of offences or irregularities may also be made anonymously.

Outside of these cases, the whistleblowing procedure requires the communication of all the mandatory data by law, otherwise the report cannot be processed. Furthermore, please note that even in the case of anonymous reporting, the Controller will process your personal data collected during browsing or through the use of applications.



Purposes and legal basis of the processing of personal data

Your personal data will be processed for the **sole purpose of managing the internal procedures relating to the reporting of offences or irregularities**, in accordance with the legal provisions on whistleblowing and, in particular, with the Directive (EU) 2019/1937 (the "**Whistleblowing Legislation**").

Legal basis: the legal basis for the processing of your personal data is represented by the need to comply with a legal obligation and, in detail, with the Whistleblowing Legislation, pursuant Article 6(1)(c) GDPR, as well as by the legitimate interest of the Controller to establish internal whistleblowing procedures to ensure compliance with the legislation and internal policies pursuant to Article 6(1)(f) GDPR. Furthermore, where special categories of personal data are processed, the processing is based on the legal grounds set out in Article 9(2)(b) and (f), GDPR.



Processing methods and data retention

The processing of personal data will be carried out either by paper means or by means of computer tools suitable for storing, managing and transmitting the data.

The Controller will retain your personal data only for as long as it is necessary to achieve the purposes for which personal data are collected or for any other legitimate related purpose.

In particular, personal data processed for the handling of reports will be kept for as long as necessary to handle those reports. Therefore, in case of unfounded complaints, your personal data will be deleted immediately. In

the other cases, your personal data will be retained for 5 years from the notification of the final outcome of the reporting procedure, including procedural or disciplinary activities such as investigations. In case of requests from authorities or in the event of judicial protection of our rights, the data will be kept for the time necessary to process the request or to pursue the protection of rights.



Categories of data recipients

For the performance of certain processing activities, your personal data may be communicated to the following external parties, who will process your personal data as autonomous controllers or processors, formally appointed by contract pursuant to Article 28 GDPR:

- Navex Global Inc, a company used by the Controller for the receipt and management of reports;
- other companies in the group to which the Controller belongs;
- judicial authorities, in the cases provided for by law;
- parties carrying out control and audit activities;
- law firms and/or consulting firms;
- authorities and institutions to which the right to access data is granted by provisions of law or regulations (e.g., public security authorities and police forces) as well as other controllers, public or private, where necessary to fulfil legal obligations.



Data transfer outside EEA

The Controller stores data in servers located within the European Union.

Where the Controller, due to requirements related to the headquarters or processing locations of its suppliers or sub-suppliers, needs to transfer data outside the European Union to countries for which the European Commission has not issued an Adequacy Decision, the Controller undertakes to ensure adequate levels of protection and safeguards, including contractual safeguards, in accordance with the applicable rules, including the stipulation of standard contractual clauses pursuant to Article 46(2)(c) GDPR, possibly supplemented by additional technical, legal and organizational measures necessary to ensure that the level of protection of personal data is equivalent to the one provided by the European Union.



Rights of the data subject

According to the applicable legislation, in relation to the transfer of your personal data, you may exercise the following rights established by the GDPR:

- the right to receive confirmation of the existence of your personal data and the right to know what personal data are being processed and how they are used (right of access);
- the right to request the update, amendment and/or correction of your personal data (right of rectification);
- the right to request the erasure of your personal data (right to be forgotten);
- the right to request the restriction of the processing of your personal data (right of limitation);
- the right to object to the processing of your personal data at any time, where the processing is based on our legitimate interest (right to object);
- the right to receive a copy of your personal data in an electronic format and request that such data be transmitted to another controller (right to data portability).

If you exercise any of the mentioned rights, the Controller may verify that you are entitled to exercise them and will give you a response within one month.

You can exercise these rights and obtain further information on the processing of your personal data by sending an email to dpo@gruppobolton.it.



Further rights

In addition to the rights listed above, you also have the right to lodge a complaint about the processing of your personal data with data protection authority.

Last update: April 2023