

INFORMATION PURSUANT TO ART. 13 EU REGULATION APRIL 27, 2016, No. 679
("GDPR")

This notice describes the ways in which Vetroelite Packaging S.r.l. (the "**Company**" or "**Owner**") collects and processes your personal data in order to handle your report pursuant to Legislative Decree no. 24/2023 (the "*Whistleblowing Decree*"), in accordance with the provisions of the GDPR, Legislative Decree no. 196 of June 30, 2003, as amended by Legislative Decree no. 101 of August 10, 2018 ("**Privacy Code**") and the applicable legislation *ratione temporis on the* protection of personal data.

(A) IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The data controller is Vetroelite Packaging S.r.l.

The data controller can be contacted at: info@vetroelite.com.

(B) CONTACT DETAILS OF THE DATA PROTECTION OFFICER

The Owner has not appointed a Data Protection Officer.

(C) CATEGORY OF DATA SUBJECTS AND PERSONAL DATA PROCESSED

To achieve the purposes set forth in § D) below, the Controller processes the following categories of data about you:

- (a) so-called common data, including identification and contact data: first name, last name, telephone number, C.F. and e-mail;
- (b) Data you voluntarily submitted through reporting.

(D) PURPOSE AND LEGAL BASIS FOR PROCESSING

The personal data you provide are processed by the Data Controller to the extent that they are necessary for the proper handling of your report and to implement provisions contained in laws, regulations, contracts and collective agreements.

Specifically, personal data will be processed for the following purposes:

- (a) Manage the internal reporting channel pursuant to Legislative Decree No. 24/2023;
- (b) Detect your identity (should you wish to do so);
- (c) To record the meeting between you and the person assigned to manage the reporting channel (Supervisory Board), or to verbalize such a meeting (should you so desire).

The legal bases related to the processing of such personal data are:

- (i) Art. 6(1)(c) GDPR: fulfilling a legal obligation (for the purpose in point 1);
- (ii) Art. 6(1)(a) GDPR: consent (for the purposes in points 2, 3 and 4).

(E) DISCLOSURE OF PERSONAL DATA

In order to pursue the purposes set forth in paragraph D), personal data processed by the Data Controller may be disclosed to the following parties:

- (a) Individuals authorized by the Owner who have contractually committed to confidentiality or have an appropriate legal obligation of confidentiality;
- (b) Data Processors designated by the Controller who have contractually committed to confidentiality or have an appropriate legal duty of confidentiality;
- (c) Public Authorities, Judicial Authority and Police Forces;

(F) PERIOD OF RETENTION OF PERSONAL DATA

Personal data will be processed for as long as necessary and in any case no longer than five years from the date of the communication of the final outcome of the Reporting procedure, in compliance with the confidentiality obligations set forth in Article 12 of Legislative Decree No. 24/2023 and the principle set forth in Article 5(1)(e) of the GDPR, without prejudice to longer retention periods determined by requests/orders from the Authorities or the defense of the rights of the Data Controller in court.

(G) RIGHTS OF THE DATA SUBJECT

Pursuant to the GDPR and personal data protection regulations, you have the right, again within the limits of Article 2-*undecies* of the Privacy Code, to:

- (a) Request access to your personal data from the Data Controller in order to request a copy and verify that it is being processed in accordance with the law;
- (b) to request the updating or rectification of your personal data in order to request the correction of any incomplete or inaccurate information about you;
- (c) request deletion or restriction or suspension of the processing of your data (e.g., you may request deletion of data where there are no longer valid reasons to continue processing or anonymization);
- (d) Object to the processing of your personal data where the legal basis for the processing is the legitimate interest of the Controller (or third party) and there is a particular interest in objecting to such processing;
- (e) Request the transfer of your data to another party;

- (f) revoke your consent to the processing of your personal data, it being understood that revocation of consent to processing does not affect the lawfulness of processing based on the consent given before revocation;
- (g) Propose a complaint to the Data Protection Authority where you believe you have suffered a breach of your data.

The rights under (a) - (f) can be exercised by sending a notice to the following *e-mail* address: info@vetroelite.com.

(H) Mandatory or optional nature of providing data

You may give your consent on a purely optional basis, if it constitutes the legal basis for the processing of Personal Data under Art. 6(1)(a GDPR).

You may also revoke any consent you have given at any time, subject to the lawfulness of the processing for the period prior to revocation.

Vetroelite Packaging S.r.l.

