



FAMI S.r.l.
VIA STAZIONE ROSSANO, 13-36027 ROSÀ (VI) ITALY
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R.I. DI VICENZA, C.F. & P. IVA IT03498610249
CAPITALE SOCIALE EURO 100.000,00 INT. VERS.
CCIAA VI: R.E.A. N° 330190
Soggetta ad attività di direzione e coord. di C.I.M.M. S.p.A.

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**DISCLOSURE PROVIDED PURSUANT TO ARTICLES 13 AND 14 OF REG. EU 2016/679
(GDPR - GENERAL DATA PROTECTION REGULATION)**

DATA SUBJECTS TO WHOM THE INFORMATION IS ADDRESSED	DEFINITION
Reporting Party (or complainant/whistleblower)	It is the natural person who reports an alleged breach of national and European regulatory provisions through the ' Whistleblowing channels made available by the company.
Reported Party (or accused/reported)	It is the natural person who is the subject of the report, accused of the alleged violations mentioned above.
Third party	It is the natural person, other than the Whistleblower and reported party, whose personal data could be contained in the report or acquired during the preliminary activity.
Facilitator	It is the natural person who assists the Whistleblower in the Whistleblowing process.

SCOPE OF THE PROCESSING

Fami S.r.l., with registered office in 36027 Rosà (VI), via Stazione Rossano 13, Italian Vat Code no. 03498610249, duly represented by its legal representative *pro tempore* (the "Company" or "Fam"), in its capacity as Data Controller (hereinafter, "Controller"), hereby informs you of the features and methods of processing of personal data provided through the sending of whistleblowing reports via the "Legality Whistleblowing" management platform, by ordinary mail or through a meeting with the Whistleblowing manager. The whistleblowing management process is governed by the specific procedure adopted by the Company, which can be consulted by employees on the Company intranet and, in any case, on the Company's website <https://www.famispaspa.it>. by selecting the menu "Whistleblowing", which should be read.

The personal data provided by the Whistleblower and the information contained in the reports and in any documents attached to them, as well as any data acquired during the investigation by the competent body, shall be processed in compliance with the principles of fairness, lawfulness, transparency and protection of the confidentiality and rights of all persons concerned (Whistleblower, reported and any third parties involved), in compliance with the requirements imposed by the privacy legislation, Italian Law 179 of 30 November 2017, concerning 'Provisions for the protection of the Whistleblowers for reports of offences or irregularities of which



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they have become aware in the context of a public or private employment relationship' and by Italian Legislative Decree 24 of 24 March 2023, transposing EU Directive 2019/1937.

Since suspected breaches can also be reported anonymously, Whistleblowers are not required to disclose their personal data. However, anonymous reporting could expose the whistleblower to the risk of possible retaliation by the reported party, without allowing the Company to provide the appropriate safeguards for reports that are not anonymous but are nevertheless confidential. The possibility of using anonymous reporting for the management of any disciplinary proceedings against the reported party will also be ruled out, without prejudice to the corroborating evidence obtained by the investigating body in the course of autonomous investigations.

However, even in relation to anonymous reporting, it cannot be ruled out that, in the course of examining anonymous reports, the body administering the procedure may receive information containing identification data, professional data, or financial data relating to the other aforementioned categories of data subjects (reported, third parties), which will be processed pursuant to this disclosure.

PURPOSE AND LEGAL BASIS OF THE DATA PROCESSING

The personal data provided by the whistleblower and acquired by the investigating body in the course of the proceedings will be processed in relation to the obligations envisaged by the aforementioned Law 179/2017 and Italian Legislative Decree 24/2023. In particular, the aforementioned data will be processed for the following purposes:

- Management of reports (verification of the facts, purpose of the report). The primary legal basis for the processing is the legitimate interest of the Controller [(art. 6 sub. 1 lett. f) GDPR] to ascertain the commission of any unlawful acts in compliance with the obligations imposed by Italian Legislative Decree 24/2023. This legitimate interest prevails over the right to the protection of personal data of the data subjects, given the overriding purpose pursued by the legislation on the administrative liability of entities for the commission of offences.

- Management of any disciplinary proceedings based in whole or in part on the report. In order to guarantee the complainant's right of defence, the information contained in the report may be used, together with any other external evidence, in the disciplinary proceedings initiated against the complainant. The identity of the whistleblower, on the other hand, may be disclosed in the context of disciplinary proceedings - hence also to the whistleblower - only if those proceedings are based exclusively on the content of the report, in order to guarantee the whistleblower's right of defence and, in any case, subject to the express consent of the whistleblower. The whistleblower's consent to the disclosure of their identity in disciplinary proceedings is not mandatory, but failure to do so will make it impossible to proceed against the reported party in disciplinary proceedings based solely on the whistleblower's statements.



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TYPE OF DATA PROCESSED

Fami collects and processes only the data communicated in the reports. However, during the procedure, the following personal data may be acquired:

- identification document, any other contact details issued by the whistleblower;
- information (identification data¹, professional data², financial data³) on the reported party contained in the report or acquired during investigation;
- information (identification data, professional data, financial data) relating to third parties that may be included in the report and in any documents attached or acquired during the investigation.

The whistleblower's personal identification data is processed and stored in such a way as to be visible exclusively to the body in charge of managing the report (Chairman of the SB). The Company adopts all the guarantees envisaged by the law in order to protect the confidentiality of the whistleblower's identity, so that the same is not disclosed to third parties without the latter's express consent, except in the case of bad faith or defamatory reports.

As indicated in the Reporting Procedure adopted by the Company, reports must not contain excess data, but only the data necessary to demonstrate the validity of the complaint. As a rule, therefore, no particular data⁴ will be entered, nor personal data suitable to reveal the state of health or judicial status. If the reports contain these categories of personal data, referring to the whistleblower or to third parties, and the same are not necessary for the pursuit of the aforementioned purposes, the Company will destroy them or, if this is not possible, obscure them, except in cases authorised by law or by a provision of the Supervisory Authority for the Protection of Personal Data.

DATA PROCESSING METHODS

The processing will take place with organisational and processing logics strictly related to the purposes indicated above and in any case in order to guarantee the security, integrity and confidentiality of the data in compliance with the organisational, physical and logical measures envisaged by current provisions.

In this regard, the Company has set up an internal whistleblowing channel (written and oral) through the use of DigitalPA S.r.l.'s "Legality Whistleblowing" management platform, which guarantees the management of access and data in strict compliance with the regulatory framework and certified by the strictest standards of ISO/IEC 27001 (information management system), guaranteeing the integrity and confidentiality of the data processed (identity of the whistleblower, the person involved and the person mentioned in the report, as well as the content of the report and the relevant documentation).

¹ for example: name, surname, date and place of birth, address, telephone number, fax, e-mail address;

² for example: profession, employer and position held;

³ for example: payroll, bank accounts and securities portfolios.

⁴ information revealing racial and ethnic origin, sexual orientation, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade union nature.



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Finally, please note that the personal identification data of the whistleblower are kept in such a way as to guarantee confidentiality. The association of the identity of the whistleblower with the report can, in fact, be carried out exclusively by the body in charge of managing the reports (Chairman of the SB).

DATA RETENTION PERIOD

Personal data relating to reports are kept and maintained for the period necessary to complete the verification of the facts set out in the report and for **5 years after the closure of the report**, except for any proceedings arising from the management of the report (disciplinary, criminal, accounting) against the reported party or the whistleblower (statements in bad faith, false or defamatory statements). In this case, they will be kept for the entire duration of the proceedings and until the expiry of the terms of appeal against the relative measure. In the case of reports deemed manifestly unfounded, they will be cancelled without delay.

RECIPIENTS OF THE PERSONAL DATA

For the pursuit of the aforementioned purposes, the information sent is managed, under its own responsibility, by the Chairman of the Supervisory Body (SB), as the party designated by the company as the recipient of the reports.

It is reiterated that only this body will have access to any identification data of the whistleblower. In this regard, the whistleblower is bound by a strict confidentiality regime.

The reported data, on the other hand, may also be processed by employees of Fami who are authorised to do so and who work in compliance with the instructions given by the Controller. Said data may also be processed by external consultants or suppliers designated for this purpose as data processors pursuant to art. 28 GDPR, who operate in compliance with the instructions given by the Controller with particular reference to the adoption of appropriate security measures in order to guarantee the confidentiality and security of the data.

The personal data contained in reports may also be communicated to the competent offices of Fami for the activation of judicial and/or disciplinary protection related to the report, or to the competent authorities in the event of breaches of applicable regulations.

In all the above cases of communication, the Controller guarantees that appropriate measures will always be taken to avoid unnecessary circulation of information, in order to guarantee appropriate confidentiality in view of the particular purposes of the processing in question.

DATA DISSEMINATION

Your personal data will not be disseminated to undisclosed recipients or published.

TRANSFER OF DATA ABROAD

Your personal data will not be transferred outside the EU.



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RIGHTS OF DATA SUBJECTS

1. Rights of the Whistleblower

The whistleblower may, subject to any existing legal requirements, exercise the rights recognised in arts. 15/22 of the Regulation:

- right of access to personal data;
- right to obtain the correction or deletion of the same (except for the contents of the report);
- right to withdraw consent, where provided: the withdrawal of consent does not affect the lawfulness of the processing based on the consent given prior to the revocation; the revocation of consent results in the impossibility of accessing your profile, you will still be able to view the reports through their codes; however, revocation is not envisaged in the event that the processing is necessary to fulfil a regulatory obligation to which the Controller is subject;
- right to lodge a complaint with the Supervisory Authority for the protection of personal data pursuant to art. 77 GDPR or appeal to the competent judicial authority pursuant to art. 79 GDPR, in the manner and within the limits established by current national legislation (Italian Legislative Decree 196/2003).

2. Rights of the Reported Party

Pursuant to the provisions of art. 2-undecies of Italian Legislative Decree 196/2003 (Data Protection Code), the Controller informs the reported person that the exercise of the rights set out above (the so-called rights of the data subject as identified by arts. 15 to 22 of the GDPR) and, in particular, the right of access, may be delayed, limited or excluded for as long as this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the data subject, in order to safeguard the confidentiality interests of the whistleblower and to ensure that the investigation does not risk being compromised (e.g. tampering with evidence, concealment of information).

The rights set out above may not be exercised by a request to the Controller, or by a complaint pursuant to art. 77, where the exercise of those rights may result in actual and concrete prejudice to the confidentiality of the identity of the whistleblower. In such cases, however, the rights of the data subjects may be exercised through the Supervisory Authority for the Protection of Personal Data as envisaged by art. 160 of Italian Legislative Decree 196/2003, pursuant to which the Supervisory Authority informs the data subject that it has carried out all the necessary verifications or a review, without prejudice to the data subject's right to appeal.

In all other cases, your rights may be exercised through the following channels:

- by e-mail to the following address: privacy@famispa.it
- by ordinary post to the following address: via Stazione Rossano no. 13 36027 Rosà (VI), Italy