

Pursuant to art. 13 of Regulation (EU) no. 2016/679 (General Data Protection Regulation, hereinafter GDPR) and Legislative Decree 24/2023, Vulcaflex SpA (hereinafter the Data Controller) provides, below, the information on the processing of personal data carried out in relation to the management of Reports, governed by the Regulation on Whistleblowing, which applies to Vulcaflex SpA

1) Categories of personal data

- Common personal data pursuant to art. 4, point 1, of the GDPR of the Reporting Person (in the case of non-anonymous Reports) as well as of any persons involved or mentioned in the Report and facilitators, as defined by the Whistleblowing Procedure (hereinafter “Data Subjects”), such as: personal data (e.g. name, surname, date and place of birth), contact data (e.g. landline and/or mobile telephone number, postal/e-mail address).
- Special categories of data pursuant to art. 9) of the GDPR, if included in the report

2) Purpose of the processing and related legal basis

The above personal data are processed by the Data Controller for the following purposes:

- management of the Report made pursuant to Legislative Decree no. 24/2023;
- fulfillment of obligations established by law or by community legislation;
- defense or ascertainment of one's own rights in civil, administrative or criminal litigation.

The legal basis for the processing is constituted by:

- for the purpose referred to in letter a), from the fulfillment of a legal obligation to which the Data Controller is subject (art. 6, par. 1, letter c) of the GDPR); furthermore, for recorded reports collected by telephone or via voice messaging systems or in any case in oral form, from the consent of the Reporting Party (art. 6, par. 1, letter a) of the GDPR);
- for the purposes referred to in letter b), from the fulfillment of a legal obligation to which the Data Controller is subject (art. 6, par. 1, letter c) of the GDPR).
- for the purposes referred to in letter c), from the legitimate interest of the owner (art. 6, par. 1, lett. f) of the GDPR) The provision of data is necessary for the achievement of the purposes mentioned above; their failure, partial or incorrect provision could result in the impossibility of managing the report.

3) Storage of personal data

Vulcaflex SpA stores personal data in accordance with the terms set out in art. 14 of Legislative Decree no. 24/2023, i.e. for the time necessary to process the report and in any case for no more than 5 years from the date of communication of the final outcome of the Report by the Supervisory Body 231.

Personal data that are clearly not useful for processing a specific report are not collected or, if collected accidentally, are deleted promptly.

4) Methods and logic of processing

Data processing is carried out manually and/or through automated computer and telematic tools with logics related to the purposes indicated above and, in any case, in a way that guarantees their security and confidentiality.

The Reporting Management System guarantees, at every stage, the confidentiality of the identity of the Reporter, of the Persons involved and/or in any case mentioned in the Report, of the content of the Report and of the related documentation, without prejudice to the provisions of art. 12 of Legislative Decree no. 24/2023.

5) Owner and categories of persons authorised to process data

The Data Controller is Vulcaflex SpA, with registered office in via A. De Gasperi 2.

The Data Controller has established the Supervisory Body, appointed pursuant to art. 6, point 1, letter b) of Legislative Decree no. 231/2001, with autonomous powers of initiative and control, which is also the owner of the reporting management process governed by the Regulation on Whistleblowing, with headquarters at the registered office of the Company, whose members have been appointed as persons authorised to process personal data.

6) Categories of third parties to whom the data may be communicated

Some treatments may be carried out by additional third parties, to whom Vulcaflex SpA entrusts certain activities (or part of them) for the purposes referred to in point 2); these parties will operate as independent Data Controllers or will be designated Data Processors and are essentially included in the following categories:

- a. Consultants (Organization, Litigation, Law Firms, etc.)
- b. Companies responsible for administration and personnel management,
- c. Auditing/Reviewing Firm
- d. Detective agencies
- e. Institutions and/or Public Authorities, Judicial Authorities, Police Bodies.

7) Rights of interested parties

The interested party, in the persons of the Reporter or the Facilitator, has the right to access at any time the data concerning him/her and to exercise the rights provided for by articles 15 to 22 of the GDPR, where applicable (right



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of access to personal data, the right to rectify them, the right to obtain their cancellation or the so-called right to be forgotten, the right to limit the processing, the right to the portability of personal data or the right to object to the processing), by sending an e-mail to the address: privacy@vulcaflex.com .

Furthermore, the interested party has the right to lodge a complaint with the Data Protection Authority.

The above rights may not be exercised by the person involved or by the person mentioned in the report, for the time and to the extent that this constitutes a necessary and proportionate measure, pursuant to art. 2-undecies of the Privacy Code, as the exercise of such rights could result in actual and concrete harm to the protection of the confidentiality of the identity of the reporting person.

Cotignola, December 13, 2023.

Vulcaflex SpA