

#### **ANNEX 4 - Information pursuant to data protection legislation - Whistleblowing**

Pursuant to Art. 13 of Regulation (EU) No. 2016/679 (General Data Protection Regulation, hereinafter: GDPR) and LD 24/2023 Alpe Adria Textil SRL (also referred to as the Company or the Data Controller) hereby provides the following information on the processing of personal data carried out in relation to the management of Reports, governed by the Company's Whistleblowing Procedure.

##### **1) Subjects and categories of personal data**

The personal data of the *subject involved*, processed in the context of **Alpe Adria Textil SRL's** Whistleblowing process, are all information of ordinary or particular nature (i.e. personal and contact details, sensitive data concerning sexual inclinations, trade union political affiliations etc., as well as information also relevant to judicial proceedings), which **Alpe Adria Textil SRL** comes into possession of—and therefore "processes"—with reference to the specific process mentioned above. "*Information on violations*" (as defined in Art. 2, par. 1, item (a), of LD no. 24 of 10.03.2023) referred to in Art. 2, par. 1, item (a), numbers 2, 3, 4, 5, and 6 of LD 24/2023, as well as the alleged unlawful conduct of which the "*reporter*" has become aware by reason of his relationship with the Data Controller, committed by persons "*involved*" who interact with the latter for various reasons, and in particular conduct relevant under LD 231/01, or of violations of the Organisation, Management, and Control Model adopted by **Alpe Adria Textil SRL**, including well-founded suspicions concerning the violations committed or that, on the basis of concrete elements, could be committed in **Alpe Adria Textil SRL**, as well as elements concerning conduct aimed at concealing such violations (art. 2, par. 1 item (b), of LD 24/2023).

In light of the above, having highlighted your position as a person "*involved*", **Alpe Adria Textil SRL** hereby informs you that your data will be processed in compliance with the applicable regulations and general principles, taking into primary consideration the protection of your confidentiality, identity, and honourableness, also due to the pending proceedings to verify the truthfulness of the reports received, and also to safeguard professional, industrial, scientific, or corporate secrecy, on the basis of the Whistleblowing Policy of **Alpe Adria Textil SRL**: where conferred, your identification/personal data will also be processed in the manner and at the times strictly necessary to verify the truthfulness of the report and to allow for its management/processing/storage in compliance with DL 24/2023.

##### **2) Purpose of processing and legal basis**

The personal data referred to in point 1) above are processed by the Controller for the following purposes:

- a) management of the Report made pursuant to LD No. 24/2023;
- b) fulfilment of compulsory obligations under the law or EU regulations;



c) defence or establishment of one's rights in civil, administrative or criminal litigation.

The legal basis for the processing is: - for the purpose referred to in point a), by the fulfilment of a legal compulsory obligation to which the Controller is subject (Art. 6, par. 1, item (c) of the GDPR); moreover, IF REQUIRED, for recorded reports collected by telephone or by voice messaging systems or otherwise in oral form, the consent of the reporter (Art. 6, par. 1, item (a) of the GDPR); - for the purposes referred to in point b), by the fulfilment of a legal compulsory obligation to which the Controller is subject (Art. 6, par. 1, item (c) of the GDPR). - for the purposes referred to in (c), by the legitimate interest of the holder (Art. 6, par. 1, item (f) of the GDPR).

Furthermore, by the provisions of Articles 2-3-4-5-12-13 of LD No. 24 of 10/03/2023, "Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and on the protection of persons who report breaches of national laws". The provision of data is necessary for the achievement of the above-mentioned purposes; failure to provide such data, in part or inexactly, may result in the impossibility of handling the report.

### **3) Storage of personal data**

The Company shall keep the personal data within the terms provided for in Article 14 of LD No. 24/2023 and in particular for the time necessary for processing the report and, in any case, for no longer than five years from the date of communication of the final outcome of the Report to the Supervisory Board 231. Personal data that are clearly not useful for processing a specific report are not collected or, if accidentally collected, are promptly deleted.

### **4) Modalities of personal data processing**

Data processing is carried out manually and/or by means of computerised and telematic automated tools with architecture related to the aforementioned purposes and, in any case, in such a way as to guarantee security and confidentiality. The procedure for handling Reports guarantees, at every stage, the confidentiality of the identity of the Reporting Party, of the Persons involved and/or in any case mentioned in the Report, of the content of the Report and the relevant documentation, without prejudice to the provisions of Article 12 of LD no. 24/2023.

### **5) The Data Controller, Privacy Contact Person and categories of persons authorised to process data in the company**

The Data Controller is **Alpe Adria Textil SRL**, based in Remanzacco, Strada di Salt, 50. The Controller has appointed a Privacy Contact Person, who can be contacted by sending an e-mail to: [privacy@alpeadriatextil.it](mailto:privacy@alpeadriatextil.it) or can be contacted at the company's headquarters. An up-to-date list of the Contact Person's contact details



can be found at [www.alpeadritextil.it](http://www.alpeadritextil.it), link Privacy. The Data Controller has set up the Supervisory Board, appointed pursuant to Article 6, point 1, item b) of LD No. 231/2001, endowed with autonomous powers of initiative and control, also with regard to the reporting management process governed by the Whistleblowing Procedure, based at the company's registered office, whose single-member body has been appointed as the person authorised/designated to process personal data and has received adequate operating instructions in this regard. In order to follow up on the Reports, the Supervisory Board avails itself of the support of authorised internal staff, who have been appointed as authorised persons for the processing of personal data and who have received adequate operational instructions in this regard.

## **6) Categories of third parties to whom the data may be disclosed**

Without prejudice to the communications and disclosures required by orders of Authorities or provided for by Law, as well as the provisions of LD no. 24 of 10/03/2023, the addressee of your personal data is the company's Supervisory Board (SB), which, in compliance with the provisions of current legislation on the subject and the "*Whistleblowing Policy*" adopted by Alpe Adria Textill SRL, is required to guarantee the confidentiality of the identity of the person reporting the crime, as well as the legitimate processing of data relating to you—the person involved—in compliance with the parameters of minimisation and necessity.

The data may be processed both by persons qualified as Data Processors pursuant to Art. 4.8 and Art. 28 of the GDPR (e.g. hardware and software support companies), and by persons authorised/designated to process the data pursuant to Art. 29 and Art. 2-quaterdecies of LD 196/03, who operate under the direct authority of the Data Controller (employees and collaborators in various capacities). In the phase of ascertaining whether the report is well-founded, where necessary for the performance of investigative activities due to the characteristics of the investigations to be carried out, your personal data may be forwarded to other internal/external structures or the ANAC (National Anti-Corruption Authority). In any case, your personal data will not be disseminated except with your consent.

Certain processing operations may be carried out by third parties, to whom the company entrusts certain activities (or part of them) for the purposes set out in point 2); these parties will act as data processors and are essentially included in the following categories: a. Consultants (Organisation, Litigation, Law Firm, etc.) b. Companies in charge of personnel administration and management c. Auditing companies d. Public Institutions and/or Authorities, Judicial Authorities, Police Bodies.

## **7) Rights of data subjects**

The data subject—i.e. the Informant or the Facilitator— has the right to access at any time the data concerning him/her and to exercise the rights provided for in Articles 15 to 22 of the GDPR, insofar as applicable (right of access to personal data, right to rectify them, right to obtain their deletion or so-called right to be forgotten,



right to restriction of processing, right to portability of personal data or right to object to processing), by sending an e-mail to: [privacy@alpeadriatextil.it](mailto:privacy@alpeadriatextil.it). In addition, the data subject has the right to lodge a complaint with the Data Protection Authority. The aforementioned rights may not be exercised by the person concerned or by the person mentioned in the report, for such time and to the extent that this constitutes a necessary and proportionate measure, pursuant to Article 2-undecies of the Privacy Code, since the exercise of such rights could result in actual and concrete prejudice to the protection of the confidentiality of the identity of the person reporting the matter.

Information as of 11/12/2023

The Alpe Adria Textil SRL Data Controller

