

PRIVACY NOTICE FOR THE REPORTING PARTY

(in accordance with Article 13 of Regulation (EU) 2016/679 concerning the processing of personal data in the context of reporting violations under Legislative Decree 24/2023)

Pursuant to Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter "GDPR") and the applicable legislation on the protection of personal data, we inform you that the personal data provided as a reporting party (hereinafter also referred to as the "Data Subject") in the case of an internal report of a violation under Legislative Decree 24/2023 will be processed, in compliance with the aforementioned regulations and in accordance with the principles of fairness, lawfulness, and transparency, by personnel authorized by PM FLEX – Hager Group under Article 29 of the GDPR and Article 2-quaterdecies of the code regarding the protection of personal data (Legislative Decree 196/2003).

1. Data Controller and Data Protection Officer

The data controller for personal data is Hager Group – Hager SE Zum Gunterstal, 66440 Blieskastel, Germany (<https://hagergroup.com/en/data-protection/website-privacy-notice#2>).

2. Purpose of Processing and Legal Basis

Personal data is processed for the management of internal reports of alleged violations, i.e., behaviors, acts, or omissions that harm public interest or the integrity of public administration or private entities, as defined by Article 2, paragraph 1, letter a) of Legislative Decree 24/2023, of which the reporting party has become aware due to their collaboration with the Data Controller. The personal data processed are those contained in the internal report and/or in acts and documents attached to it that refer to the reporting party and any other possible involved party.

Personal data may also be processed for the conduct of necessary investigative activities to verify the validity of the reported information, as well as, if necessary, for the adoption of appropriate corrective measures and the initiation of appropriate disciplinary and/or legal actions against those responsible for the violations. The legal basis legitimizing the processing of personal data is the fulfillment of a legal obligation to which the Data Controller is subject (Article 6, paragraph 1, letter c) of the GDPR), specifically provided by Legislative Decree 24/2023. The processing may also involve special categories of data and data related to criminal convictions and offenses if included in the report as provided for by Articles 9 and 10 of the GDPR.

The identity of the employee may be communicated to other parties.

3. Categories of Data Recipients

The personal data provided will be processed by members of the Whistleblowing Committee and by other internal subjects of the Company authorized by the Data Controller to process the information, in order to follow up on and respond to the received reports, in compliance with Legislative Decree 24/2023. In the event that the Company entrusts a third party with the management of the reporting channel, such personal data will be processed by that party as a Data Processor appointed by the Data Controller under Article 28 of the GDPR. This data will be processed exclusively by specifically authorized personnel and in accordance with the provisions of Legislative Decree 24/2023. Personal data will not be subject to disclosure but may be transmitted to the Judicial Authority. None of the collected data will be transferred to Third Countries, intended as countries not belonging to the European Economic Area (EEA). If the report is external and is submitted, as provided for by Articles 6 and 7 of Legislative Decree 24/2023, to the National Anti-Corruption Authority (ANAC), information regarding the processing of personal data will be provided by the Authority itself through the appropriate channels.

4. Criteria for Storage Time

Internal reports and related documentation will be kept for the time necessary for the processing of the report and in any case not beyond five years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations of Article 12 of Legislative Decree

24/2023 and the principles of Article 5, paragraph 1, letter e) of the GDPR and Article 3, paragraph 1, letter e) of Legislative Decree 51 of 2018. After the maximum period of five years, information related to the report may be kept by the Company in order to guarantee and preserve its right to defense and provide evidence, if required, of the correct management of the received reports. In such cases, the personal data of the reporting party will be anonymized.

5. Data Processing Methods

The processing of personal data will be carried out exclusively by expressly authorized personnel, ensuring the confidentiality of the reporting party's identity and the content of internal reports and related documentation. Adequate technical and organizational measures will be adopted to protect them from unauthorized or unlawful access, destruction, loss of integrity, and confidentiality, even accidental. To ensure the confidentiality of the reporting party for the entire duration of the internal reporting process, the identity of the reporting party will be known only to individuals expressly authorized to handle the reports. Except in cases where liability for defamation and slander arises under the provisions of the Criminal Code or Article 2043 of the Civil Code, or, where applicable, within the criminal proceeding and within the limits and methods provided for by Article 329 of the Code of Criminal Procedure, the identity of the reporting party is protected in any context following the report. Therefore, subject to the exceptions mentioned, the identity of the reporting party cannot be revealed without their express consent, and all those who receive or are involved in the management of the report are required to protect the confidentiality of this information.

6. Provision of Data

The provision of personal data is optional. However, failure to provide it may compromise the investigation of the report: anonymous reports will be considered only if adequately substantiated and presented with detailed information to bring out facts and situations connected to specific contexts.

7. Rights of Data Subjects

The rights under Articles 15-22 of the GDPR can be exercised, within the limits set by Article 2-undecies, paragraph 3, of Legislative Decree 196/2003 et seq., by contacting the Data Controller or the Data Protection Officer using the contacts provided above. In particular, the rights identified above cannot be exercised by requesting the Data Controller or the Data Protection Officer, or by filing a complaint under Article 77 of the GDPR with the Supervisory Authority, where the exercise of such rights could cause actual and concrete harm to the confidentiality of the identity of the person reporting violations that they have become aware of due to their work or functions performed. The exercise of the aforementioned rights may, in any case, be delayed, limited, or excluded with motivated communication made promptly by the Data Controller, unless the communication could compromise the purpose of the limitation, for the time and within the limits that constitute a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the reporting party, the involved person, or persons in any capacity involved in the reports. In such cases, under Article 2-undecies, paragraph 3, of Legislative Decree 196/2003, the Data Subject has the option to exercise the aforementioned rights through the Supervisory Authority in the manner provided for in Article 160 of the aforementioned legislative decree. In cases where it is believed that the processing of personal data violates the provisions of the GDPR, it is possible to lodge a complaint with the Supervisory Authority, as provided for in Article 77 of the GDPR itself (excluding the limitations on the exercise of the rights mentioned above and provided for by Article 2-undecies, paragraph 3, of Legislative Decree 196/2003 et seq.), or to bring the matter before the appropriate judicial authorities (Article 79 of the GDPR).