

## POLICY FOR THE PROCESSING OF PERSONAL DATA

(drafted pursuant to Article 13 of European Regulation No. 679/2016)

The company ACI blueteam S.p.A. makes this statement regarding the processing of personal data in accordance with the European General Data Protection Regulation No. 679/2016 ("GDPR"). The processing of personal data relating to the receipt and management of reports will be carried out in compliance with the European and national principles on the protection of personal data, as well as in accordance with the provisions of Legislative Decree No. 24/2023, providing appropriate information to the reporting persons and the persons involved in reports, as well as adopting appropriate security measures to protect the rights and freedoms of data subjects.

### Data controller

The Data Controller is:

- ACI Blueteam S.p.A.,
- Via Risorgimento, 70, 22070 Luisago (CO), Italy
- [Info@aciblueteam.it](mailto:Info@aciblueteam.it)

### The Data Protection Officer (DPO)

The Company has appointed a Data Protection Officer who supports the Data Controller with regard to the application of national and European data protection regulations, cooperating with the Supervisory Authority and serving as a point of contact with data subjects. The Data Protection Officer can be reached at: [privacy@aciblueteam.it](mailto:privacy@aciblueteam.it).

### Types of data being processed

As part of receiving and handling reports of wrongdoing violations, the Data Controller may process the following types of personal data:

- Personal data (name, surname, residential address, place and date of birth, etc.),
- Contact details (email and telephone),
- Identity document (identity card, driving license, etc.),
- So-called "special" personal data (data relating to health conditions, sexual orientation, or trade union membership, etc., referred to in Article 9 GDPR),
- Personal data relating to criminal convictions and crimes (as per Art. 10 GDPR).

The data will be processed to conduct the necessary investigative activities aimed at verifying the merits of what has been reported, as well as, where appropriate, taking appropriate corrective measures and appropriate disciplinary and/or judicial action against those responsible for the misconduct.

### Purpose and legal basis for processing

Personal data are collected and processed for the following purposes:

- a) Receiving and handling reports of misconduct, regarding conduct, acts or omissions that harm the public interest or integrity of the public administration or private entity and consisting of:
  - Administrative, accounting, civil or criminal offences,
  - Material misconduct pursuant to Italian Legislative Decree 231/2001 or violations of organization and management,
  - Offences falling within the scope of European or Italian national acts relating to the following areas: public procurement, services, financial products and markets and the prevention of money

### ACI blueteam S.P.A.

Registered headquarters: Via Marsala, 8 - Rome (RM) 00185 Italy c/o Presidenza ACI

Administrative headquarters: Via Risorgimento, 70 - Luisago (CO) 22070 Italy - Tel: +39 031 9090711 - Email: [info@aciblueteam.it](mailto:info@aciblueteam.it) - Certified email: [aciblueteam@pec.it](mailto:aciblueteam@pec.it) V.A.T./Social Security Number: 12593590156 - Business Register: Rome n°12593590156 - Recipient code: MJEGRSK

REA RM-1603827 – Paid-up common equity capital €700,000  
Stock Company

Company subject to the direction and coordination of Ventura

laundering and terrorist financing, product security and compliance, transport security, environmental protection, radiation protection and nuclear safety, food and feed safety and animal health and welfare, public health, consumer protection, privacy protection and personal data protection and network and information system security,

- Acts or omissions affecting the commercial interests of the European Union,
- Acts or omissions concerning the Italian internal market,
- Acts or conduct that defeat the object or purpose of the provisions referred to in the acts of the European Union.

b) To ascertain, exercise or defend a right or legitimate interest of the Owner in any competent instance.

The legal basis of the processing referred to in purpose a) is found in the need to fulfill a legal obligation to which the Data Controller is subject pursuant to art. 6, paragraph 1, letter c) of the GDPR. In detail, the legal obligations are stipulated in the provisions contained in the Legislative Decree March 10, 2023, No. 24 "Implementation of Directive (EU) 2019/1937 on the protection of persons who report violations of Union law and laying down provisions concerning the protection of persons who report violations of national regulatory provisions" and the Italian Legislative Decree June 8, 2001, No. 231 "Discipline of the administrative liability of legal persons, companies and associations, including those without legal personality."

The legal basis referred to in purpose b) is found in the need to pursue the legitimate interest of the Data controller pursuant to art. 6, paragraph 1, letter f) of the GDPR.

### **Nature of data provision**

The provision of personal data is optional; however, failure to provide it could prejudice the investigation of the report. Anonymous reports, in fact, will be taken into account only where they are adequately substantiated and rendered in great detail, so as to bring out facts and situations related to specific contexts.

### **Methods of processing**

The Data Controller commits to process, in a lawful, fair, and transparent manner, only the data necessary to achieve the purposes that are indispensable for the performance of the reported activities.

The processing is conducted by the Data Controller with the help of computer and/or paper media.

The report of misconduct will be collected and managed through an IT platform in compliance with current regulations on the protection of personal data, as well as in accordance with the provisions of Legislative Decree No. 24/2023, so as to ensure the security and confidentiality of the identity of the whistleblower.

### **Categories of recipients**

The personal data of the reporter and the persons indicated as possibly responsible for the illegal conduct, as well as those persons variously involved in the reported events, will not be disclosed.

However, the Data Controller may communicate, in accordance with the purposes of processing and on the basis of the same prerequisites of lawfulness indicated above, the personal data collected to third parties belonging to the following categories:

- To the Judicial Authority or National Anti-Corruption Authority (ANAC, from the Italian acronym Autorità Nazionale Anticorruzione). These subjects are autonomous Data Controllers.
- Police force, competent authorities, and other public administrations. These entities will act as Data Controllers,

### **ACI blueteam S.P.A.**

**Registered headquarters:** Galleria Caracciolo, 14 - Roma (RM) 00185 Italy

**Administrative headquarters:** Via Risorgimento, 70 - Luisago (CO) 22070 Italy - Tel: 031 9090711 - Email: info@aciblueteam.it

**Certified email:** aciblueteam@pec.it **V.A.T./Social Security Number:** 12593590156 - **Business Register:** Rome n°12593590156

**Recipient code:** MJEGRSK **REA** RM-1603827 – **Paid-up common equity capital** €700,000

Stock Company

Company subject to the direction and coordination of Ventura SpA

- Certified email service provider,
- Attorneys and auditing/revision or consulting firms may perform, by way of example, consulting activities, support for the provision of services etc., who will act, as the case may be, as autonomous data controllers, or as data processors on the basis of a specific agreement on the processing of personal data concluded pursuant to Article 28 GDPR. The report and the identity of the reporter cannot be accessed by means of either document access or generalized public access.
- Company providing the IT platform for the reception and management of reports of offences. This subject acts as Data Processor pursuant to Article 28 of the GDPR under the direction and control of the Data Controller.

Individuals such as employees, contractors and consultants who are employed within and in support of central business functions and operational activities within the scope of reporting management may also become aware of the data as "authorized processors."

The updated list of Data Processors designated by the Data Controller in relation to the performance of services is kept at the registered office of the Company.

#### **Data transfer abroad**

The personal data of data subjects will not be communicated or transferred to countries located outside the European Union.

#### **Automated decision-making processes**

The Data Controller does not use automated decision-making processes in any way involving the personal data of the data subject.

#### **Data retention period**

In relation to the above purposes, personal data will be collected and stored for the time stipulated by the Whistleblowing legislation (Art.14, Paragraph 1 of the Whistleblowing Decree), which stipulates the deletion of reports and related documentation no later than 5 years from the date of the communication of the final outcome of the reporting procedure and, in any case, for a period of time not exceeding the achievement of the purposes for which they are collected or subsequently processed.

Furthermore, personal data may be processed for the activation of judicial and/or disciplinary protection related to the report, or communicated to the competent Authorities in the presence of violations of applicable regulations, as well as being transmitted in the face of binding orders from the same Authorities.

#### **Rights of the data subject**

At any time, the data subject may exercise their rights, listed below, in accordance with the provisions of EU Regulation 679/2016 and applicable Italian national legislation:

- **Right of access:** the data subject has the right to obtain confirmation as to whether or not personal data concerning him or her is being processed and if so, to obtain access to the personal data. The data subject may request access to the following information: the purposes of the processing, the categories of data processed, the recipients to whom the personal data are or will be communicated, the period of data retention, the existence of rights in his or her favor, the origin of the data, and whether an automated process exists.

#### **ACI blueteam S.P.A.**

**Registered headquarters:** Galleria Caracciolo, 14 - Roma (RM) 00185 Italy

**Administrative headquarters:** Via Risorgimento, 70 - Luisago (CO) 22070 Italy - Tel: 031 9090711 - Email: info@aciblueteam.it

**Certified email:** aciblueteam@pec.it **V.A.T./Social Security Number:** 12593590156 - **Business Register:** Rome n°12593590156

**Recipient code:** MJEGRSK **REA** RM-1603827 – **Paid-up common equity capital** €700,000

Stock Company

Company subject to the direction and coordination of Ventura SpA

- **Right of rectification:** the data subject has the right to obtain from the data controller the rectification of inaccurate personal data concerning him/her without undue delay. In addition, he/she has the right to obtain supplementation of incomplete personal data, also by providing a supplementary statement. In such a case, the data controller will be obliged to inform each recipient to whom the personal data have been transmitted about any corrections.
- **Right of deletion:** the data subject has the right to obtain the deletion of personal data concerning him or her without undue delay and to request erasure. In addition, if the data have been made public, the Data controller will delete them and take reasonable measures, including technical measures, to inform the data controllers who are processing the personal data of the data subject's request to delete any copies of the personal data.
- **Right to restrict processing:** if the data subject deems it appropriate, he or she may request the restriction of the processing of personal data concerning him or her and limit its processing in the future. In such a case, the data controller will notify each of the recipients to whom the personal data have been transmitted of any processing restrictions, unless this proves impossible or involves a disproportionate effort.
- **Right to lodge a complaint with the Supervisory Authority:** whenever the data subject considers that his or her data has been processed unlawfully and violates the rules and principles on the protection of personal data, he or she has the right to appeal to the Supervisory Authority (Privacy Guarantor) to lodge a complaint, according to the procedures defined by the latter.

The Data Controller reserves the right to limit or delay the exercise of these rights, within the limits set by the applicable provisions of law, especially where there is a risk that an actual, concrete and not otherwise justified damage to the confidentiality of the identity of the Reporting Party and that the ability to effectively verify the merits of the Reporting or to gather the necessary evidence pursuant to Articles 2-undecies and 2-duodecies of the Privacy Code and Article 23 of the GDPR may be compromised.

### **ACI blueteam S.P.A.**

**Registered headquarters:** Galleria Caracciolo, 14 - Roma (RM) 00185 Italy

**Administrative headquarters:** Via Risorgimento, 70 - Luisago (CO) 22070 Italy - Tel: 031 9090711 - Email: info@aciblueteam.it

**Certified email:** aciblueteam@pec.it **V.A.T./Social Security Number:** 12593590156 - **Business Register:** Rome n°12593590156

**Recipient code:** MJEGRSK **REA** RM-1603827 – **Paid-up common equity capital** €700,000

Stock Company

Company subject to the direction and coordination of Ventura SpA