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PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

WHISTLEBLOWING REPORTING SYSTEM

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR) and Italian Legislative Decree No. 24 of 10 March 2023

INTRODUCTION

ITAFILON S.r.l. regards legality, integrity, transparency and confidentiality as fundamental principles of its organisation and pays particular attention to protecting personal data processed through its internal whistleblowing reporting system. In implementation of Italian Legislative Decree No. 24 of 10 March 2023, ITAFILON S.r.l. has adopted a whistleblowing procedure and established a dedicated internal channel that allows eligible persons to submit reports in a manner designed to protect the confidentiality of the persons involved. This notice explains how personal data are processed when whistleblowing reports are received, analysed, investigated and managed.

1. DATA CONTROLLER

ITAFILON S.r.l.

Via Giacomo Puccini n. 5
24060 San Paolo d'Argon (BG)
C.F. e P. IVA 03942330162
REA BG – 442706

PEC: itaflon@progettostudio.legalmail.it

E-mail: privacy@itaflon.com

2. DATA SUBJECTS

The processing may concern, in particular:

- the reporting person (whistleblower);
- the reported person or the person to whom the breach is attributed;
- facilitators;
- persons involved in or mentioned in the report;
- any witnesses;
- other persons whose personal data appear in the report or in documents obtained during the investigation.

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3. CATEGORIES OF PERSONAL DATA PROCESSED

Depending on the content of the report, the following may be processed:

- identification and contact details; information concerning employment, professional position or the relationship with ITAFILON S.r.l.;
- information concerning the facts and conduct reported; data contained in documents and evidence attached or subsequently obtained; information concerning persons involved, reported or mentioned;
- any further personal data strictly necessary to assess and manage the report.

Depending on the report, special categories of personal data under Article 9 GDPR and data relating to criminal convictions and offences under Article 10 GDPR may also be processed incidentally, solely where relevant and necessary for handling the report and in accordance with applicable law. Personal data manifestly irrelevant to a specific report will not be collected or, if accidentally collected, will be erased without undue delay.

4. PURPOSES AND LEGAL BASES OF PROCESSING

Purpose	Description	Legal basis
Management of whistleblowing reports	Receipt, recording, analysis, verification, investigation and management of reports submitted through the channels provided for by the company procedure.	Article 6(1)(c) GDPR - compliance with a legal obligation to which the Controller is subject under Italian Legislative Decree No. 24/2023.
Verification of the reported facts	Activities necessary to assess whether a report is substantiated, obtain information and documents, and carry out the necessary inquiries	Article 6(1)(c) GDPR in connection with the obligations arising from Italian Legislative Decree No. 24/2023.
Protection of rights and management of consequences	Measures resulting from the report and the establishment, exercise or defence of legal claims in or out of court	Article 6(1)(c) GDPR under Italian Legislative Decree No. 24/2023 and, where necessary to establish, exercise or defend legal claims, Article 6(1)(f) GDPR where applicable

Where a report or the related investigation involves special categories of personal data, processing will be limited to what is necessary and based on the applicable conditions under Article 9(2) GDPR and current legislation. Data relating to criminal convictions and offences will be processed in accordance with Article 10 GDPR and applicable national provisions.

5. IDENTITY OF THE REPORTING PERSON AND CONFIDENTIALITY

Reports are managed in accordance with the specific confidentiality obligations under Italian Legislative Decree No. 24/2023. The identity of the reporting person, and any other information from which that identity may be inferred directly or indirectly, are protected through specific organisational and technical measures. Such information may not be disclosed to persons other than those authorised and competent to receive or follow up reports, except in the cases and subject to the conditions expressly laid down by applicable law. Equivalent protection is afforded, within the limits provided by law, to the person concerned, the person mentioned in the report and other persons protected under Legislative Decree No. 24/2023.

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6. REPORTING CHANNEL AND PROCESSING METHODS

ITAFILON S.r.l. provides a dedicated internal reporting channel through a purpose-built digital platform. Data are processed using tools and organisational procedures designed to safeguard the confidentiality of the identity of the reporting person, the persons involved and mentioned, the content of the report and the related documentation. Reports are managed by the Supervisory Body (Organismo di Vigilanza - OdV), in accordance with ITAFILON S.r.l.'s Whistleblowing Procedure. Access is restricted to expressly authorised persons and only to the extent strictly necessary for their respective duties.

7. SOURCE OF THE DATA

Personal data may be obtained:

- directly from the reporting person;
- from documents and attachments submitted with the report;
- during subsequent communications with the reporting person;
- through verification and investigation by the person or body responsible for handling the report;
- from other persons involved in the investigation;
- from documents, records and other sources that may lawfully be used to establish the reported facts.

This notice is therefore also provided under Article 14 GDPR in relation to personal data not obtained directly from the data subject, without prejudice to any applicable statutory limitations or exemptions.

8. RECIPIENTS AND PERSONS WHO MAY PROCESS THE DATA

Personal data are processed only by persons competent to receive and manage reports and by other authorised persons whose involvement in the investigation is necessary, in accordance with the principle of necessity and confidentiality obligations.

For the technical management of the whistleblowing platform, ITAFILON S.r.l. uses AGM Solutions / the designated platform provider, appointed as a processor under Article 28 GDPR. Where necessary and within the limits laid down by law, data may also be disclosed to judicial authorities, competent administrative authorities, the Italian National Anti-Corruption Authority (ANAC) and other parties legally entitled to receive them. Personal data will not be disseminated.

9. RETENTION PERIOD

Reports and related documentation are retained for as long as necessary to manage the report and in any event for no more than five years from the date on which the final outcome of the reporting procedure is communicated, in accordance with Italian Legislative Decree No. 24/2023. Personal data manifestly irrelevant to a specific report will not be collected or, if collected accidentally, will be erased without undue delay. At the end of the applicable retention period, data will be erased or anonymised, without prejudice to further statutory retention obligations.

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10. TRANSFERS OF DATA TO THIRD COUNTRIES

If technology providers used for the whistleblowing system entail transfers of personal data to countries outside the European Economic Area, such transfers will be made only in accordance with Articles 44 et seq. GDPR and on the basis of safeguards provided for by applicable law. Data subjects may request information on any applicable safeguards by contacting the Controller.

11. AUTOMATED DECISION MAKING

Personal data processed through the whistleblowing system are not subject to decisions based solely on automated processing, including profiling, which produce legal effects concerning the data subject or similarly significantly affect them within the meaning of Article 22 GDPR.

12. DATA SUBJECT RIGHTS AND RESTRICTIONS

In the cases and within the limits laid down by applicable law, data subjects may exercise the rights under Articles 15 et seq. GDPR, including access, rectification, erasure and restriction of processing. In the whistleblowing context, however, the exercise of these rights may be restricted or excluded where permitted by law if it would result in an actual and concrete prejudice to the confidentiality of the reporting person's identity or to other interests protected by whistleblowing legislation. Any restriction will apply only in the cases, manner and for the period permitted by current law.

Requests may be sent to the Controller using the contact details in section 1. Data subjects retain the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) in accordance with applicable law.

13. UPDATES TO THIS NOTICE

This notice was last updated on 11 August 2026 - Rev. 01. ITAFLON S.r.l. may update or amend it if the Whistleblowing Procedure, the systems used, the processing methods or applicable law change. Material changes will be brought to the attention of data subjects by means appropriate and proportionate to the nature of the changes.

Issue date: 11 August 2026

ITAFLON S.r.l.

The Data Controller

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