

**POLICY REGARDING THE HANDLING OF REPORTS OF UNLAWFUL AND IRREGULAR CONDUCT  
(WHISTLEBLOWING) - ARTICLES. 13 AND 14 OF REGULATION (EU) 2016/679 (GDPR)**

This policy describes how we collect, use, and disclose personal data collected as part of the management of reports of unlawful and irregular conduct ("Whistleblowing"), as described in internal procedure PE10000-000-PR-0007 "Whistleblowing Procedure Pursuant to Legislative Decree. 24/2023" and the manner in which we carry out related processing to ensure its security and confidentiality, in compliance with Regulation (EU) 2016/679 on the protection of personal data of natural persons ("GDPR"), as well as any additional applicable legislation on the protection of personal data, to the extent consistent with the same GDPR.

For any clarifications regarding the processing of personal data, you may contact us by writing to [privacy@pegitaly.it](mailto:privacy@pegitaly.it).

**1. Who is responsible for the processing of personal data?**

The Data Controller of personal data is PROGETTI EUROPA & GLOBAL S.p.A. ("PEG") with registered office in Piazza Stia, 8 - 00138 - Rome. Tel. + 3906881741, fax + 390688174210.

**2. For what purposes and on what legal basis do we process personal data**

Personal data, directly provided or acquired in the context of the Whistleblowing system, will be processed exclusively for the purpose of receiving and handling reports ("Report(s)") in compliance with Legislative Decree 24/2023 and in accordance with the company's procedure and for the execution of any consequent actions.

The legal basis for the processing is based on the need to fulfill a legal obligation to which the Data Controller, in its capacity as employer, is subject by reason of the Report received (Art. 6.1, c, GDPR).

The data will also be processed where it is necessary to ascertain, exercise and defend a right of PEG or a third party in the competent fora, as well as for purposes of internal control and monitoring of business risks. The legal basis for the processing is based on the legitimate interest of the Data Controller (Art. 6.1, f), GDPR).

The provision of data is optional, and the reporter ("Whistleblower") is requested to provide only the data necessary to describe the facts that are the subject of the Report without communicating redundant and additional personal data to those necessary with respect to the purposes stated above.

**3. What types of data do we process?**

As part of the management of Reports, we may collect both the personal data of the Whistleblower and the personal data of the Person Involved (such as first name, last name, address, position held, etc.), as well as any data of third parties mentioned in the Report (e.g., Facilitators and Subject Connected - see § Definitions - PE10000-000-PR-0007) and any additional information contained in the Report or collected as part of investigative activities. In addition, as part of the management of the Report, we may also process data of a special nature, as defined in Art. 9 of the GDPR (such as, for example, data disclosing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as data disclosing health and sex life), as well as we may process data relating to criminal convictions or offenses and related security measures, as defined in Art. 10 of the GDPR (such as, for example, data relating to criminal records and pending charges).

Data will only be processed where necessary for the management of the Report, in accordance with the principles of proportionality, relevance, appropriateness and necessity under the GDPR.

**4. How long do we store your personal data?**

The data will be stored for a period of time no longer than is necessary for the purposes for which they are processed, in accordance with legal obligations and in accordance with the security and confidentiality methods and standards provided for in the company's procedures, and in any case no longer than five years starting from the date of the communication of the final outcome of the reporting procedure.

The data will be stored at our platform provider's servers located within the European Union.

**5. To whom your personal data may be disclosed?**

Within PEG, personal data may be brought to the attention only of individuals duly authorized to carry out the processing operations related to the aforementioned activities.

The aforementioned data may also be brought to the attention of third parties (e.g., IT service providers) who enable the operation and maintenance of the IT tools used for the management of the Reports, appointed for this purpose as "Data Processors" pursuant to Article 28 of the GDPR.

Finally, we may disclose data to competent authorities and other public entities for the fulfillment of obligations under laws, regulations and EU legislation.

## 6. What are your rights regarding the processing of personal data?

At any time, you will be able to have full clarity on the operations we have referred to you and exercise the rights you are granted under Articles 15 et seq. of the GDPR. You may exercise, at any time, in the manner and within the limits governed by the aforementioned legislation:

- **Right of access:** you may request information from us about the processing we do on your data or confirmation that we process your personal data. You will also be able to request us to provide you with copies of your data by e-mail and to verify what data we hold on you.
- **Right of rectification:** you have the right to request us to rectify your data if it is incorrect (e.g. because it is different from the data you provided to us when establishing the existing relationship with you), including the right to request rectification of incomplete data.
- **Right to erasure:** you have the right to request us to erase the data you have provided to us (e.g. because it is no longer necessary for the performance of the relationship or because you have objected to the processing and there is no overriding reason for the processing).
- **Right of restriction:** you may request us to restrict the processing of your personal data if the legal circumstances apply.
- **Right to portability:** you will be able to obtain from PEG, in a structured, commonly used, machine-readable format, the personal data you have provided to us and transmit them to another party.
- **Right to object:** you may object at any time, on grounds relating to your particular situation, to the processing of your personal data in accordance with Article 6(1)(f) GDPR, unless we have legitimate reasons.
- **Right to file a complaint with the Supervisory Authority:** without prejudice to any other administrative or judicial remedy, you have the right to file a complaint with the Data Protection Authority if you believe that our data processing violates current data protection regulations.

The exercise of the aforementioned rights may be limited if the exercise thereof may result in actual and concrete prejudice to the confidentiality of the identity of the Whistleblower (Art. 13, para. 3 of the Decree and Art. 2-undecies of Legislative Decree 196/2006 so-called "Privacy Code").

You may exercise the above rights by writing to [privacy@pegitaly.it](mailto:privacy@pegitaly.it).

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