

**Information Notice ('Notice')**

pursuant to Articles 13 and 14 of the EU Regulation 2016/679 ('Regulation')

**Monteverdi s.r.l.** is the data controller (hereinafter referred to as 'Data Controller') of personal data collected in the context of reports of breaches of national or European Union regulations that harm the public interest or the integrity of the Data Controller (hereinafter referred to as 'Whistleblowing Reports').

This document supplements the further information already delivered previously (e.g. employees, suppliers, etc.) and therefore the information already provided therein will not be repeated.

The Data Controller has appointed a Data Protection Officer ('DPO') whom you can contact by writing to [privacy@monteverdituscany.com](mailto:privacy@monteverdituscany.com).

The personal data processed may be, only if you decide to disclose your identity, your personal data, as well as the identification data of the reported person and the names of other people who may report on the facts that are the subject of the Whistleblowing Report, as well as all the facts related to your Whistleblowing Report.

In the context of the Whistleblowing Report you may disclose particular or judicial data; however, please do not do so unless strictly necessary for the purposes of the Whistleblowing Report.

Your data is processed for the following purposes: receiving, analysing and handling the Whistleblowing Report.

The legal basis for such processing is a legal obligation and in particular the provisions of Legislative Decree 24/2023.

Any personal data that fall into the categories of special data or judicial data are processed by the Data Controller in fulfillment of obligations relating to employment security and social security.

We point out that once the Whistleblowing Report has been handled, its content may be further used for the Holder's legal protection and for the necessary defense actions. In this case, the legal basis for the processing of such personal data is the legitimate interest of the Data Controller.

The Whistleblowing Report could also be used for the initiation of disciplinary or sanctioning actions in the event that pretextual, retaliatory or discriminatory behavior is carried out to the detriment of the reported person or the whistleblower. Such processing is carried out on the basis of the applicable regulatory provisions (Legislative Decree 24/2023).

Please note that you may also send a Whistleblowing Report in an anonymous form, which will in any case be taken into account and analysed. With regard to the identity of the reported person, the provision of his/her data is similarly optional, but the Whistleblowing Report may not be taken into account where this is not materially possible.

Please note that if you have decided to disclose your identity, your personal data will only be processed by authorised personnel who are committed to confidentiality, without prejudice to disclosure obligations prescribed by law. Your personal data may be shared, to the extent strictly necessary, for the above purposes with:

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- Collegial bodies of the Data Controller in charge and only those persons strictly necessary to follow up the Whistleblowing Report who have committed to confidentiality, including the facilitator, if any;
- subjects, entities or authorities to whom it is mandatory to communicate your personal data by virtue of legal provisions or orders by the authorities;
- any external legal advisers and suppliers of the platform with whom the Controller has entered into contracts for the processing of personal data and who act as data processors.

Your personal data will be processed both automatically and manually, ensuring the security and confidentiality of your personal data. This is with particular reference to the data of the reporter, which will be protected by anonymity (unless he or she wishes to disclose his or her identity).

The Controller, for the processing activities described above, does not transfer personal data outside the European Economic Area. More information is available from the Data Controller.

- Whistleblowing Reports will be handled within three months from the date of the notice of receipt or, in the absence of such notice, within three months from the expiry of the period of seven days from the submission of the Whistleblowing Report. Whistleblowing Reports and the related documentation shall be retained for the time necessary for the processing of the Whistleblowing Report and in any case no longer than five years from the date of the communication of the final outcome of the Whistleblowing Report procedure, in compliance with the confidentiality obligations set out in Article 12 of Legislative Decree 24/2023 and the principle set out in Article 5(1)(e) of the Regulation
- At any time you may request to access your data: we will provide you with the data we have on you, where applicable, the source of your data. This right is not actually exercisable by the person subject to Whistleblowing;
- make your data portable: where applicable, we will provide you with an excel file containing the data we have on you;
- rectify your data if you believe it is incorrect or needs to be updated;
- restrict the processing of your data: for example, if you believe that our processing is unlawful and/or that some processing carried out on the basis of our legitimate interest is inappropriate;
- delete your data;
- object to the processing of your personal data.

The response time required by European legislation to which we are subject is 1 month from your request (extendable up to a further 2 months in cases of particular complexity).

Please note that pursuant to Article 2 *undecies* of Legislative Decree no. 196/2003, the rights referred to in Articles 15 to 22 of the Regulation may not be exercised by making a request to the Data Controller or by lodging a complaint pursuant to Article 77 of the Regulation if the exercise of such rights would cause actual and concrete prejudice to the confidentiality of the identity of the person making a Whistleblowing Report, prejudice which will be assessed

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on a case-by-case basis, in concrete terms, and only where it is a necessary and proportionate measure. Should the Data Controller make use of this limitation, you will be informed of it without delay, in writing. We remind you that, in such cases, your rights may also be exercised through the Garante in the manner set out in Article 160 of Legislative Decree No. 196/2003 et seq.

You can exercise your rights by writing an e-mail to [privacy@monteverdituscany.com](mailto:privacy@monteverdituscany.com). You can always contact the DPO by writing to [privacy@monteverdituscany.com](mailto:privacy@monteverdituscany.com).

In any case, you have the right to lodge a complaint with the competent Supervisory Authority (Garante per la Protezione dei Dati Personali), pursuant to Art. 77 of the Regulation, if you believe that the processing of your personal data is contrary to the legislation in force, subject to the limits set out in Art. 2 *undecies* of Legislative Decree no. 196/2003 above.