

WiQo S.p.A. (hereinafter also referred to as the “Company”), in its capacity as **Data Controller**, hereby informs you that Regulation (EU) 2016/679 (the “GDPR”) and Legislative Decree No. 196/2003, as amended and supplemented, govern the protection of personal data.

WiQo S.p.A. processes personal data in accordance with the principles of lawfulness, fairness, transparency, and necessity, as required by the above-mentioned legislation.

Accordingly, pursuant to Article 13 of the GDPR, we provide you with the following information.

1. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The Data Controller of your personal data is: WiQo S.p.A.

- Registered office: Via Fra' Cristoforo 14/D, 20142 Milan (MI), Italy
- Tax Code/VAT Number: 11269510159
- Contact e-mail: privacy@wiqo.eu

2. CATEGORIES OF PERSONAL DATA PROCESSED

The receipt and management of whistleblowing reports may involve the processing of so-called personal data (such as first name, last name, job position, and any other information related to the alleged or suspected unlawful conduct). Depending on the content of the report and any supporting documentation attached thereto, the processing may also involve special categories of personal data pursuant to Article 9 GDPR, including data relating to health, sexual orientation, or trade union membership.

3. PURPOSES AND LEGAL BASIS OF THE PROCESSING

Personal data are collected and processed exclusively for purposes strictly connected with the management of reports concerning unlawful conduct, violations of national or European legislation, the Company's Code of Ethics, and the Company's Organizational, Management and Control Model. Considering the applicable legislation (EU Directive 2019/1937 and Legislative Decree No. 24/2023), the legal basis for such processing is:

- For personal data: Article 6(1)(c) GDPR (“processing is necessary for compliance with a legal obligation to which the Data Controller is subject”);
- For special categories of personal data: Article 9(2)(g) GDPR.

4. METHODS OF PROCESSING

The Data Controller undertakes to process personal data lawfully, fairly, and transparently and only to the extent necessary to achieve the purposes related to the management of the reported matter.

Processing is carried out by the Data Controller, including through electronic means and automated tools, as well as through systems designed to receive oral reports, adopting appropriate technical, organizational, and physical security measures (including file encryption) to protect information against alteration, destruction, loss, theft, unauthorized access, or unlawful use.

Reports and all related documentation concerning their management shall be retained for a period of five (5) years from the date on which the final outcome of the reporting procedure is communicated. The identity of the reporting person and any information from which such identity may be directly or indirectly inferred shall be processed exclusively by individuals authorized to process personal data pursuant to Article 29 GDPR and shall not be disclosed to other parties without the specific consent of the reporting person, as required by applicable whistleblowing legislation.

Providing such consent is optional and may be given when submitting the report through the reporting platform.

5. DISCLOSURE AND TRANSFER OF PERSONAL DATA

Your personal data will not be publicly disclosed. However, they may be processed by the following parties, by way of example and not limitation:

- Public authorities, where required by law, and judicial authorities acting as independent Data Controllers;
- IT service providers acting as Data Processors pursuant to Article 28 GDPR, bound by confidentiality obligations and processing data solely for purposes related to the services entrusted to them;
- The Supervisory Body (Organismo di Vigilanza);
- Legal advisors involved, where necessary, in the investigation process;
- Any internal functions involved in the assessment and investigation activities, duly authorized and subject to confidentiality obligations.

The list of external Data Processors is available at the Company's registered office.

6. DATA SUBJECTS' RIGHTS

Pursuant to Articles 15 to 22 of the GDPR, and within the limits set forth by Article 2-undecies of the Italian Privacy Code, data subjects may exercise the following rights:

- a) Right of access to personal data;
- b) Right to rectification of inaccurate personal data;
- c) Right to erasure of personal data;
- d) Right to restriction of processing;
- e) Right to data portability, namely the right to receive the personal data provided in a structured, commonly used and machine-readable format and to transmit those data to another Data Controller without hindrance;
- f) Right to object to processing, where applicable.

Data subjects also have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), whose registered office is located at Piazza Venezia 11, 00187 Rome, Italy.

For further information regarding this Privacy Notice, any privacy-related matter, or if you wish to exercise your rights, please contact: privacy@wiqo.eu