

## **1. Introduction**

Mundys SpA (hereinafter “Mundys”), as the Data Controller pursuant to art. 13 of Regulation (EU) 2016/679 – the General Data Protection Regulation (the “Regulation”), wishes to inform you about the use of the personal data of whistleblowers, reported persons and any other third-parties involved (hereinafter the “data subject”), in relation to the handling of Disclosures governed by the provisions of Law 179/2017 *“Provisions for the protection of individuals reporting crimes or irregularities of which they have become aware in the context of a public or private employment relationship”*, which should be read in full for further details.

## **2. Definition and types of ‘personal data’ processed**

As specified in Article 4 of the Regulation, "personnel data" means *any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.*

Mundys, through its personnel, may come into possession of the following personal data (referring to the whistleblower, the reported person or third parties) following receipt of a non-anonymous disclosure:

- name and surname; contacts details (phone number, email address, postal address, etc.).

## **3. Purpose of processing**

The personal data of data subjects is processed for purposes connected with the application of the above Whistleblowing Policy, in compliance with the provisions of the aforementioned Law 179/2017.

## **4. Processing methods**

The data provided and collected will be processed using IT tools such as the specific platform accessible from the websites of Mundys Group companies, whether disclosures are received through this channel or in paper form.

Data is processed for the above purposes and, in any event, in such a way as to guarantee security and confidentiality of the data.

## **5. Storage of personal data**

Personal data may be stored by the Data Controller in paper or digital form and protected using appropriate security measures for a period that does not exceed the time necessary to fulfil the purposes for which it was collected and processed and, in any event:

- 12 months for disclosures that are clearly without grounds and not relevant for the purposes of Legislative Decree 231/2001;
- 5 years from completion of the investigation of the events described in the disclosure.

In cases resulting in legal and/or disciplinary action against the reported person or the whistleblower in the event of statements found to have been made in bad faith, to be false or defamatory, the personal data may be stored throughout the duration of the legal and/or disciplinary action until the final conclusion and the term for appeal has expired.

## **6. Transfer of data overseas**

With the exception of specific requirements to be agreed on case by case, any personal data provided shall not be transferred overseas.

## **7. Nature of the provision of data – Legal basis**

Pursuant to art. 6, paragraph 1.c) and 1.f) of the Regulation, all the personal data collected as part of this process, including via third parties, is collected strictly for the purposes of meeting and ensuring fulfilment of the legal obligations of the data controller and in order to pursue the legitimate interests thereof.

## **8. Persons authorised to process your data – Data communication**

Your personal data may be used solely by Mundys personnel responsible for processing it (members of the Whistleblowing Committee and its technical secretariat) and who have been assigned a specific role and who have received appropriate instructions designed to ensure confidentiality.

Your data may be communicated to the following third parties, who act under the direction and control of the Data Controller as external data processors pursuant to Article 28, paragraph 3 of the Regulation:

- Unione Fiduciaria which, in the name and behalf of Mundys, manages the IT platform used to handle whistleblowers' disclosures.

## **9. Disclosure of data**

Your personal data will not be disclosed to unspecified parties or published.

## **10. Data Controller**

The data controller is Mundys SpA, with its registered office at Pizza San Silvestro 8, 00187 Rome.

## 11. Data subjects' right

For legitimate and well-founded reasons, and consistent with any existing legal and contractual obligations, Mundys acknowledges that data subjects may exercise the rights recognised in articles 15 et seq. of the Regulation. This can be done by writing to the Data controller at the above address or to the email address [privacy@mundys.com](mailto:privacy@mundys.com), specifying the subject of the request and the reasons for which the data subject intends to exercise their rights.

Please note that, under existing legislation, data subjects have the right:

- to request that their data be updated, amended, added to, removed or converted into anonymous form and block the processing of any data processed in breach of the law, including data no longer needed for the purposes for which it was collected;
- to be informed of the reasons for which the data is processed and the related procedures and purposes;
- to receive the data in a structured, commonly used electronic format;
- to withdraw any consent given for the processing of their data at any time and object to, in full or in part, the use of such data.

Furthermore, in the manner and within the limits provided for by the Regulation, Mundys grants you the right to lodge a complaint with the Data Protection Authority and to exercise the other rights granted to you by existing legislation.