

WHISTLEBLOWING PRIVACY POLICY PURSUANT TO ART. 13 OF EU REGULATION 2016/679 (GENERAL DATA PROTECTION REGULATION - "GDPR")

	IDENTITY OF THE DATA CONTROLLER	MUNDYS SpA (hereinafter " Mundys " or " Data Controller "), with its registered office at Piazza San Silvestro 8, 00187 Rome			
	DATA CONTROLLER'S CONTACT DATA	- Email: privacy@mundys.com - Address: Piazza San Silvestro 8, 00187 Rome.			
	PERSONAL DATA COLLECTED	Personal data (e.g. identification and personal data, contact data, special data under art. 9 of the GDPR, judicial data under art. 10 of the GDPR) regarding the whistleblower and/or reported person and/or any third parties provided by the whistleblower and/or acquired during the required investigations.			
	PURPOSE OF PROCESSING		LEGAL BASIS OF PROCESSING		PERSONAL DATA STORAGE TIMES
1.	Manage reports of any fraudulent and/or illegal or irregular conduct related to the internal control and risk management system (violations of the Code of Ethics, of Model 231/01, bullying, theft, fraud, etc.), including internal investigations and enquiries linked to verification of the reported conduct	Legal obligation		Twelve (12) months after completion of the verification of the events set out in the report, for reports deemed to be unfounded and irrelevant for the purposes of the apposite legislation (e.g. <i>for the purposes of Legislative Decree 231/2001</i>) Five (5) years after completion of the verification of the events set out in the report, for reports deemed to be well-founded and that are followed up	
2.	Manage and request the whistleblower's identity in the event that the Data Controller decides the need to: disclose the identity of the whistleblower to persons other than those competent to receive or follow up reports (that is, the Whistleblowing Committee) [<i>Legislative Decree 24/2023, Art.12 par 2</i>];	Consent		Twelve (12) months after completion of the verification of the events set out in the report, for reports deemed to be unfounded and irrelevant for the purposes of the apposite legislation (e.g. <i>for the purposes of Legislative Decree 231/2001</i>) Five (5) years after completion of the verification of the events set out in the report, for reports	

	• detect the identity of the Whistleblower if, as part of the disciplinary procedure, the dispute is based, in whole or in part, on the reporting and knowledge of the identity of the signaller is essential for the defense of the accused [Legislative Decree 24/2023, Art.12 par 5]; • retain and document the report that is made via telephone line or voice message [Legislative Decree 24/2023, Art.14 par 2]; • retain and document the transcript of the report made, at the request of the Whistleblower, through an oral hearing at the Whistleblowing Committee [Legislative Decree 24/2023, Art.14 par 4].		deemed to be well-founded and that are followed up
3.	Initiate any measures subsequent to confirmation of the reported events, and safeguard Mundys' rights to the extent and in the manner provided for by applicable legislation.	Legitimate interest	Ten (10) years from the date of conclusion of the contractual relationship, including in compliance with any legal obligations under civil, tax and regulatory provisions, etc.
The retention time may be extended in the event of legal or disciplinary action and to enforce Mundys' rights. In such event, your personal data will be retained for the duration of the proceedings, until they are concluded and all time limits for appeals have expired.			
	HOW DATA IS PROCESSED AND SECURITY MEASURES	Data may be processed by technological and/or paper methods and through suitable IT tools (e.g. software, hardware, applications, etc.). In this regard, Mundys has controls and procedures in place to ensure the confidentiality of your data, and is constantly committed to adopting, pursuant to art. 32 of the GDPR, specific technological and organisational measures to protect data against the risk of loss, unlawful or incorrect use and unauthorised access. In particular, transmission and storage of the data provided by a whistleblower via the platform is managed with tools and protocols designed to ensure the confidentiality of the whistleblower's identity at all stages of the process (e.g. no persistent cookies are installed to track users, no cookies are configured, and logs are not registered, etc.).	

	RECIPIENTS AND CATEGORIES OF RECIPIENT OF PERSONAL DATA	In order to pursue the stated purposes of processing, personal data may be transferred to various entities, including: - the Data Controller's employees and collaborators, in their capacity as authorised data processors; - third parties contractually linked to the Data Controller, who in certain cases will act as data processors or autonomous data controllers; - judicial authorities and/or public bodies, at their express request and/or under the law, during investigations and checks in their capacity as autonomous data controllers; - Other Group companies as autonomous data controllers. A full list of recipients of Data Subjects' Personal Data, including further details on the location of such recipients, is kept at the Data Controller's head office and may be consulted on request.
	TRANSFER OF PERSONAL DATA	Your personal data will essentially be processed within the European Union. In the event that it is necessary to transfer your data to third parties located outside the European Economic Area (EEA) for specific processing management purposes, such transfer will only take place where the European Commission has confirmed an appropriate level of data protection in the third country or where there are adequate data protection safeguards in place (e.g. EU standard contractual clauses for the transfer of data to third countries).
	DATA SUBJECT RIGHTS¹	With regard to the Data Controller, Data Subjects may at any time exercise their rights as provided for in Articles 15 <i>et seq.</i> of the GDPR, in relation to the processing of their personal data, such as, for example, right of access, correction, deletion, restriction of and opposition to processing by sending an email request to privacy@mundys.com.
	RIGHT TO LODGE A COMPLAINT WITH THE DATA PROTECTION AUTHORITY	If you believe that your personal data have been processed unlawfully, you have the right to lodge a complaint with the Italian Data Protection Authority (https://www.garanteprivacy.it/).
	PROVISION OF PERSONAL DATA	With regard to the purpose of processing, the provision of data is not strictly compulsory as anonymous reports are also accepted, although named reports are preferable.
	AUTOMATED DECISION-MAKING PROCESS	Personal data collected will not be subject to an automated decision-making process.

¹ The rights referred to in Articles 15 to 22 of the GDPR may not be exercised via a request to the data controller or via a complaint pursuant to Article 77 of the Regulation if actual and concrete detriment to the confidentiality of the identity of the whistleblower who reports unlawful conduct, pursuant to Law no. 179/2017, of which he or she has become aware, may result from the exercise of such rights. Therefore, the exercise of such rights may be delayed, restricted or excluded by issuing reasoned notice to the data subject for such time and to the extent that this constitutes a necessary and proportionate measure. In such cases, the data subject's rights may be exercised via the Italian Data Protection Authority (as per the procedures set out in Article 160 of the Privacy Code), which informs the data subject that it has carried out all the necessary checks or conducted a review, and also provides details regarding the data subject's right to judicial appeal.