

PRIVACY NOTICE

Whistleblowing System

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR")

Italtel S.p.A., with its registered office at Via Caldera 21, 20153 Milan (hereinafter "Italtel" or the "Company"), acting as the Data Controller, informs you that personal data collected within the scope of the whistleblowing system are processed in compliance with applicable personal data protection legislation and the provisions of Legislative Decree no. 24/2023.

The following definitions apply:

- violation – conduct, act, or omission that harms the public interest or the integrity of the Company;
- report – a written or oral communication of information regarding violations, submitted via the internal reporting channels of the Company's Whistleblowing system;
- reporting person – the person submitting a report regarding violations obtained within the context of their work at the Company;
- reported person (or involved person) – the person identified in the report as the individual to whom the violation is attributed or as someone otherwise implicated in the reported violation;
- mentioned person – the person identified in the report as someone who might provide information regarding the reported violation but is not implicated in it.

1. Who this notice applies to

This notice applies to personal data processed during the management of whistleblowing reports and concerns:

- the reporting person;
- the involved or reported person;
- persons potentially mentioned in the report;

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- the facilitator assisting the reporting person;
- individuals benefiting from the protection measures provided for by Legislative Decree no. 24/2023, such as family members, colleagues, and other persons connected to the reporting person in the cases prescribed by law.

2. What data we process

Personal data contained in the report and related documentation may be processed, such as:

- identification and contact details;
- information regarding the employment or professional relationship;
- information on the reported facts and the individuals involved;
- any documents attached to the report.

Personal data that are manifestly irrelevant to the processing purpose—as indicated in paragraph 3 below—will not be collected or, if collected inadvertently, will be deleted without delay.

3. Purposes for which we use the data

Personal data are processed exclusively to:

- receive and manage reports;
- carry out necessary preliminary investigations;
- adopt any corrective, disciplinary, or legal measures;
- ensure the protection of the reporting person and other individuals protected by applicable regulations;
- comply with legal obligations.

4. Legal basis for processing

Personal data processing is carried out to comply with obligations under Legislative Decree 24/2023, Legislative Decree 231/2001, and applicable personal data protection regulations, as well as to safeguard the Company's integrity by addressing violations—or the effects thereof—that could cause harm to the Company.

5. How reports may be submitted and data processed

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Your personal data will be processed using manual, electronic, and/or digital tools—which ensure the security and confidentiality of the data—strictly in connection with the processing purposes.

In particular, reports may be submitted via:

- the whistleblowing platform;
- the dedicated e-mail address;
- the telephone channel managed by the Internal Audit function;
- a direct meeting with the Head of the Internal Audit function.

6. Who may access the data

Personal data are processed exclusively by individuals who are expressly authorized and bound by confidentiality obligations. In particular, access to the data is granted to:

- members of the Ethics Committee;
- the Head of Internal Audit for the preliminary handling of oral reports;
- the Supervisory Body in the cases provided for by the procedure;
- any consultants or suppliers supporting the management of the system, provided they are duly authorized or appointed as data processors;
- competent authorities in cases provided for by law.

The data will not be disseminated.

7. Confidentiality and protection of the whistleblower

Italtel adopts technical and organizational measures designed to guarantee the confidentiality of the identity of the whistleblower, the person involved, and other parties protected under whistleblowing regulations, in accordance with applicable law.

8. Data retention period

Personal data and documentation relating to reports are retained for the time necessary to handle them and, in any event, for no longer than five years following the communication of the final outcome of the reporting procedure.

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9. Rights of data subjects

You may at any time exercise the rights to the Data Controller provided for in Articles 15 to 22 of the GDPR, within the limits set out in Article 2-undecies of Legislative Decree 196/2003 (Privacy Code).

Indeed, to further protect the whistleblower, Art. 2-undecies, paragraph 1, letter f) of the Privacy Code stipulates that the rights of data subjects (referred to in Articles 15 to 22 of the GDPR) may not be exercised via a request to the Data Controller or by lodging a complaint with the Italian Data Protection Authority (Art. 77 of the GDPR) if the exercise of such rights could result in actual and concrete prejudice *"to the confidentiality of the identity of the person reporting violations of which they became aware by virtue of their employment relationship or the functions performed [...]"*.

In such cases, the Data Controller will assess the data subject's requests in compliance with applicable regulations and the safeguards provided for by Legislative Decree 24/2023.

10. Contact details

For any request regarding the processing of personal data or to exercise the rights provided for by the GDPR, you may contact:

Italtel S.p.A.

Via Caldera 21, 20153 Milan

Data Protection Officer (DPO)

dpo@italtel.com

You also retain the right to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

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