

PRIVACY NOTICE

Concerning the processing of personal data of individuals who submit reports through My Whistleblowing



PRIVACY POLICY REGARDING PROCESSING CARRIED OUT UNDER THE WHISTLEBLOWING LEGISLATION

Pursuant to Art. 13 of Legislative Decree No. 196/2003 of the Personal Data Protection Code (hereinafter, also, the "Privacy Code") and pursuant to Art. 13 of European Regulation No. 679/2016 (hereinafter, also, the "GDPR") we are providing you with this notice.

THE DATA CONTROLLER.

The data controller is TETHIS S.p.A. with registered office in Milan, Via Francesco Olgiati 5, ZIP Code 20143, VAT and Tax Code 04227720960, e-mail: privacy@tethis-lab.com. The Data Protection Officer can be reached at the following email address: dpo@tethis-lab.com

PLACE OF DATA PROCESSING.

Related processing takes place in Italy and there is no activity of transfer or dissemination abroad or to countries outside the EU. No data is communicated or disseminated, except for statistical purposes and in any case in an anonymous and/or aggregate manner.

PURPOSE OF DATA PROCESSING.

The personal information you provide is used for the sole purpose of handling the Whistleblowing report you made.

DATA PROCESSED.

The personal data processed are exclusively:

- First Name
- Last name
- E-mail address.

LEGAL BASIS FOR PROCESSING

The legal basis under which personal data are processed is the legal obligation arising from the provisions of Article 6 of Legislative Decree No. 231 of 2001, as amended by Law No. 179 of 2017, on "Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship."

STORAGE TIMES

The personal information you provide will be deleted within 5 years of its collection.

WITH WHOM WE SHARE THE DATA WE COLLECT

Your personal data may be accessed by the employees in charge of investigating Whistleblowing reports and the members of the Supervisory Board pursuant to Legislative Decree 231/2001. In addition, considering that Whistleblowing reports are forwarded through the My Whistleblowing software, your personal data may also

be accessed by the provider of the aforementioned application, appointed for this purpose as data controller pursuant to Article 28 of the GDPR. It is understood that, in line with the principle of protection of the confidentiality of the whistleblower set forth in Law 179/2017, the sharing of your personal data will be limited to what is strictly necessary to guarantee your confidentiality.

MODE OF TREATMENT.

Personal data are processed by both automated and manual means and for the purposes stated above. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

RIGHTS OF DATA SUBJECTS.

Under certain conditions you have the right to exercise the rights provided by Articles 7, 8, 9 and 10 of the Privacy Code and Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR and, in particular, to ask:

- Access to your personal data;
- The copy of the personal data you have provided to us (so-called portability);
- The rectification of data in Tethis' possession;
- The deletion of any data for which Tethis no longer has any legal basis for processing;
- Opposition to processing where possible by applicable regulations;
- Withdrawal of your consent if the processing is based on consent;
- The limitation of the way Tethis processes your personal data, within the limits provided by the legislation to protect personal data.

The exercise of these rights is subject to certain exceptions aimed at safeguarding the public interest (e.g., the prevention or identification of crimes) and Tethis interests (e.g., maintaining professional secrecy). In the event that you exercise any of the above rights, it will be Tethis responsibility to verify that you are entitled to exercise them, and we will, as a rule, respond to you within one month.

Should anyone have any doubts regarding compliance with this privacy notice adopted by TETHIS S.p.A., its application, the accuracy of their personal data or the use of the collected information, they may write by e-mail at: privacy@tethis-lab.com.

However, if you wish, you may forward your complaints or reports, pursuant to Article 77 of the GDPR, to the data protection authority, using the relevant contact details:

Garante per la protezione dei dati personali - Piazza di Monte Citorio n. 121 - 00186 ROMA - Fax: (+39) 06.69677.3785 - Phone: (+39) 06.696771 - E-mail: garante@gpdp.it - Certified mail: protocollo@pec.gpdp.it.