

**WHISTLEBLOWING PRIVACY POLICY**  
regarding the processing of personal data of individuals submitting reports  
through My Whistleblowing 2.0



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## DATA PROTECTION

Pursuant to Article 13 of Regulation (EU) 2016/679 (“GDPR”) the Company provides this privacy notice regarding the processing of personal data carried out in the context of managing Whistleblowing Reports.

### 1. Data Controller

The Data Controller is:

A.A.G. STUCCHI s.r.l. u.s.  
Via IV Novembre, 30/32  
23854, Olginate (LC)

Contactable at the following email address: [info@aagstucchi.it](mailto:info@aagstucchi.it).

The Privacy Consultant appointed by the Company is Mattia Caravina, who can be contacted at +39 0341 653111 and at [privacy@aagstucchi.it](mailto:privacy@aagstucchi.it).

### 2. Types of Data Processed

Within the management of Reports, personal data relating to the Reporting Persons and other individuals potentially involved may be processed, including, where necessary, special categories of data pursuant to Article 9 GDPR and data relating to criminal convictions or offences pursuant to Article 10 GDPR. The data processed may include, by way of example, identification and contact details, as well as information contained in the Report (such as date, place, description of the facts, and individuals involved).

### 3. Purpose and Legal Basis of Processing

Personal data are processed exclusively for the management and investigation of whistleblowing reports and for compliance with obligations set forth by applicable whistleblowing regulations. The legal basis for processing is the fulfilment of legal obligations pursuant to Article 6(1)(c) GDPR, with particular reference to Legislative Decree 231/2001, as amended by Law 179/2017, and Legislative Decree no. 24 of 10 March 2023 implementing Directive (EU) 2019/1937.

### 4. Methods and Principles of Processing

The processing of personal data is carried out by the Whistleblowing Manager exclusively for the implementation of whistleblowing procedures, in compliance with the principles of lawfulness, fairness, transparency, data minimisation, proportionality, and confidentiality.

In accordance with the principles of privacy by design and privacy by default, the Company has adopted secure and confidential reporting channels, suitable to ensure the anonymity of the

Reporting Person or, alternatively, the confidentiality of their identity and that of any third parties involved, without prejudice to legal disclosure obligations. Processing is carried out using both electronic and manual tools, with the adoption of appropriate technical and organisational measures to prevent unauthorised access, data loss, or unlawful use.

## 5. Recipients of Data

Personal data may be processed by employees and collaborators expressly authorised and adequately trained. The Company may also rely on external providers, appointed as Data Processors pursuant to Article 28 GDPR, including the provider of the IT platform (MYGO SRL) used for managing Reports. Data may be disclosed, to the extent necessary and proportionate, to corporate bodies and competent company functions, as well as to judicial authorities or other competent authorities, where required by applicable law.

## 6. Data Retention

Personal data are retained for the time strictly necessary for managing the Report and, in any case, no longer than the period established by applicable law, currently set at five years from collection. After this period, data will be deleted or anonymised.

## 7. Place of processing

Processing activities are mainly carried out within Italy. No transfer of data to non-EU countries is envisaged. Any statistical processing is carried out exclusively in anonymous or aggregated form.

## 8. Data Subjects' Rights

Data subjects may exercise the rights provided for in Articles 15–22 GDPR, within the limits permitted by whistleblowing regulations and in compliance with the need to safeguard the confidentiality of Reports and the individuals involved. The exercise of such rights may be restricted where necessary to protect public interest or the effectiveness of investigative activities. Requests may be addressed to the Data Controller using the contact details provided above. In any case, data subjects have the right to lodge a complaint with the Italian Data Protection Authority pursuant to Article 77 GDPR.