

PRIVACY POLICY IN THE CONTEXT OF - WHISTLEBLOWING -

Manni Group S.p.A., and the subsidiaries, hereinafter also the "Company, in its capacity as Data Controller, pursuant to art. 13 of the European Regulation 2016/679 concerning the protection of personal data ("Regulation" or "GDPR"), through its Supervisory Body, authorised to process any personal data provided of the same data subject, shall be authorised to process the data in the event of whistleblowing, that is to say reporting alleged unlawful conduct and/or irregularities of which the data subject was aware.

1. Data Controller

The Data Controller is Manni Group S.p.A. with registered office in via A. Righi, 7 - 37135 (VR), telephone 045/8088911, e-mail address: reception.hp@manningroup.com

2. Data Protection Officer

Pursuant to art. 37 of the European Regulation, in view of the processing activities performed within Manni Group S.p.A. and its subsidiaries, the Data Controller designated Simone Vesentini as the Personal Data Protection Officer, commonly referred to as Data Protection Officer (DPO), who may be contacted at the following e-mail address: gdpr@manningroup.com

3. Origin of the data processed, purpose and legal basis of the processing

ORIGIN: any personal data processed by the Data Controller, through its Supervisory Body, are provided by the data subject or disclosed and/or known in the event of whistleblowing, that is to say reporting of alleged unlawful conduct and/or alleged irregularities.

PURPOSE: the data subjects' personal data are processed for the purposes related to the management of the Whistleblowing procedure and in order to fulfil the obligations established by law, regulations or community legislation. Therefore, personal data shall be processed for the purposes below:

a) carrying out assessment and investigation activities in relation to the whistleblowing, to the reporting alleged unlawful conduct and/or irregularities;

- b) adopting the measures envisaged by the Organisational Model pursuant to (It.) Legislative Decree 231/2001 adopted by Manni Group S.p.A. or, in any case, required in the specific case;
- c) allowing any other fulfilment required by law and by the current legislation, as well as by the Organisational Model pursuant to (It.) Legislative Decree 231/2001 adopted by Manni Group S.p.A.

LEGAL BASIS: the legal basis for the processing of personal data provided as a result of whistleblowing regarding alleged irregularities or offences, which became known within the context of the employment relationship, based on the Whistleblowing procedure and in relation to the Organisation and Management Model, lies in the legal obligation deriving from the provisions of art. 6 of (It.) Legislative Decree no. 231 of 2001, as amended by (It.) Law no. 179 of 2017, containing "Provisions for the protection of whistleblowers of offences or irregularities of which such subjects became aware within the context of a public or private employment relationship".

4. Categories of recipients of personal data

The Supervisory Body is the recipient of the personal data, which in compliance with the provisions of current legislation and the provisions envisaged by the whistleblowing procedure adopted by the Company, is required to ensure confidentiality of the whistleblower's identity. Throughout the phase of ascertaining the validity of the report and should it be necessary for any requirements related to the preliminary investigation activities, personal data may be forwarded to other offices and/or departments of the Company, protecting the confidentiality of the whistleblower's identity. Personal data may be disclosed to the head of the corporate department in charge of disciplinary proceedings and/or to the accused party only upon the whistleblower's express consent or in case the dispute of the disciplinary charge is based solely on the whistleblowing report and knowing the whistle-blower's identity is absolutely essential for the purposes of defending the accused party.

Furthermore, if the requisites exist, personal data may be disclosed to third parties included in the categories below: consultants (Organisation, Law Firms, etc.), Companies in charge of the administration and management of personnel, of the retention of employees' personal data, of the development and/or operation of the information systems dedicated to this, Institutions and/or Public Authorities, Judicial Authorities, Police Bodies, Investigative Agencies.

In any event, personal data shall not be disseminated.

5. Retention period of personal data

Personal data collected for the aforementioned purposes shall be stored at the Data Controller's premises for the time required to ascertain the validity of the whistleblowing and, if necessary, to adopt any consequent disciplinary measures and/or for the time necessary for any disputes initiated after the whistleblowing to be completed, in compliance with the principles of appropriateness, relevance and minimisation, and the need for their retention shall be periodically verified. In such case, any data processed shall be kept for the entire duration of the procedure envisaged by the Organisational Model pursuant to (It.) Legislative Decree 231/2001. It may occur that the Data Controller is required to keep

some personal data for a longer period of time, in order to comply with regulatory obligations and in order to pursue any purposes deriving from said obligations. In such case, without prejudice to the aforementioned principles, the Data Controller shall keep this information for a period of two months from the closing date of the procedure.

Once said terms have elapsed and, except for the cases in which it is required to keep such data in order to ascertain, exercise or materially defend a right before the Court, the Data Controller shall erase any acquired personal data or shall make them anonymous.

6. Transfer of personal data to third countries

The Data Controller will not transfer personal data to third countries. In fact, the whole processing of personal data shall take place within Italy, or in some limited cases, within the European Union.

7. Rights of the data subject

The EU Regulation 2016/679 (articles from 15 to 23) acknowledges to the data subjects the exercise of specific rights such as: right to access personal data thereof and right to rectify or erase their personal data or the right to limit the processing related to them or the right to object to the processing (articles 15 et seq. of the GDPR). Furthermore, data subjects shall have the right to lodge a complaint with the Data Protection Authority (www.garanteprivacy.it) in case they deem that the processing of their data would be contrary to the legislation in force (Article 77 of the GDPR) or the right to engage in legal proceedings (Article 79 of the GDPR).

In order to exercise each of its own rights, the data subject may contact the Data Controller or the Data Protection Officer by sending a communication to the aforementioned contact addresses.