

WHISTLEBLOWING POLICY

In accordance with Articles 13 and 14 of Regulation (EU) 679/2016

1) Data controller

OCME SRL, with registered office in Parma (PR), via del Popolo 20/A, PEC: privacy@pec.ocme.com, as the data controller of your personal data, pursuant to and in accordance with Legislative Decree 679/2016 on "the protection of individuals with regard to the processing of personal data and the free movement of such data", hereby informs you that your data will be processed in accordance with the principles of accuracy, lawfulness, transparency and protection of your privacy and rights.

2) Data controller representative and data protection officer

The figures for the data controller's representative and the data protection officer (DPO) are not included in this organisation as they are not required by the Regulation itself.

3) Type of data processed and purposes of processing

The processing of your personal data will be carried out in particular for the management of the whistleblowing disclosure, i.e. for the investigation and definition of the whistleblowing disclosure, in accordance with the forms and limitations provided for by Legislative Decree No. 24/2023.

The data processed will be all those relevant to the management of the whistleblowing disclosure, communicated by you or collected during the preliminary research, and may concern:

- a) personal and contact details
- b) data relating to qualifications and duties;
- c) data relating to the reported offence, such as written documents, photographs, videos, judicial data, health data, etc., also relating to third parties involved in the whistleblowing disclosure.

In any case, the personal data provided will be processed in such a way as to protect the confidentiality of the whistleblower identity.

4) Legal basis and lawfulness of the processing

With reference to the profile of lawfulness, the undersigned declares that the legal basis of the processing is as follows Article 6(1)(C) of the GDPR, namely the fulfilment of a legal obligation to which the data controller is subject, as specified by Legislative Decree No. 24/2023

5) Processing methods

All processing will be carried out with the adoption of security measures, both technical and organisational, appropriate to the processing itself, in accordance with Article 32 of the Regulation.

All data will be processed in electronic and/or paper form and measures will be taken to minimise processing in terms of the type of data, access authorisations and retention periods, in accordance with the provisions of Legislative Decree no. 24/2023 and the provisions of the "Whistleblowing Procedure" published on the Company's website at the following link: <https://www.ocme.com/it/compliance>

6) Nature of data provision

The provision of personal data for the purposes of whistleblowing is optional.

However, failure to provide or incomplete provision of the data referred to in letters a), b), c), Art. 3 of this information notice may prevent the effective follow up of the whistleblowing disclosure.

7) Persons authorised to process data

In order to guarantee the confidentiality of the whistleblower, the identity of the whistleblower will only be known to the manager of the internal whistleblowing channel, as further specified in the specific "Whistleblowing Procedure", as an authorised and specially trained person, in accordance with the provisions of Legislative Decree no. 24/2023.

If the needs of the investigation require that other persons be informed of the content of the whistleblowing disclosure or of the documents attached to it, the identity of the whistleblower shall not be disclosed, nor shall any information be disclosed that could lead, even indirectly, to the identification of the whistleblower.

The right to confidentiality does not apply if the whistleblower may be held liable for slander or defamation under the Criminal Code or Article 2043 of the Civil Code, or in the cases provided for in Article 12 of Legislative Decree 24/2023.

8) Categories of recipients of personal data and automated decision making process

Your personal data and those of the persons indicated as possible perpetrators of the unlawful act, as well as those of the persons involved in various ways in the reported events, will not be disclosed.

However, such data may be communicated to the judicial authority and to ANAC, the National Anticorruption Authority.

Furthermore, your data will not be included in any automated decision making process.

9) Transfer of data outside the European Union

There are no plans to transfer your data to a third country or an international organisation (country outside the European Union).

10) Retention period

Your personal data will be kept for 5 years from the date of notification of the final outcome of the whistleblowing disclosure.

11) Rights of the data subject

You have the right to request from the Data Controller the access, deletion, communication, updating, rectification, objection to processing, integration, restriction, portability, knowledge of the violation of your personal data, as well as, in general, the exercise of all the rights provided by articles 13 et seq. of EU Regulation 679/2016.

All the aforementioned rights may be exercised by writing to the registered office of the Data Controller or to the following Pec address: privacy@pec.ocme.com.

In particular, the exercise of the rights referred to in articles 15 et seq. by the reported person concerned shall be guaranteed in a manner compatible with the requirements of confidentiality of the identity of the whistleblower pursuant to articles 2 et seq. of the Privacy Code.

12) Right to lodge a complaint

Lei ha il diritto di proporre reclamo all'Autorità di controllo competente "Garante Privacy Italiano" nel caso in cui ritenga che i suoi diritti nell'ambito di protezione dei dati personali siano a rischio (www.garanteprivacy.it).

You have the right to lodge a complaint with the competent "Italian Data protection Authority" (www.garanteprivacy.it) if you believe that your privacy rights have been violated.

Data Controller
OCME S.R.L.