

**POLICY ON PROCESSING PERSONAL DATA
FOR REPORTING ALLEGED OFFENCES
pursuant to art. 13 of EU regulation
2016/679**

PRIVACY POLICY

The following policy is addressed to both the authors of reports of alleged offences and the individuals to whom the information contained in the reports refers, when brought to the attention of QUIRIS via the dedicated reporting portal (<https://quirisholding.integrityline.com>) or by ordinary mail addressed to Organismo di Vigilanza di QUIRIS S.a.p.a. - Via Gabriele d'Annunzio, 2/75, 16121 Genova GE; in some cases, handling the report may involve processing personal data referring to other individuals (e.g. facilitators, colleagues and relatives of the whistleblower).

The offences or breaches reported relate to conduct, acts or omissions committed within the organisation, which harm the interests and integrity of the Company and of which the whistleblower has become aware by virtue of his or her legal relationship with the Company.

Reports may relate to significant unlawful conduct pursuant to Italian Legislative Decree no. 231/2001 or even breaches of the organisation and related management models. For a full description of the breaches that can be reported, see Article 2 of Italian Legislative Decree 24/2023.

Data controller and contact details

The data controller is **QUIRIS S.A.P.A.**, with registered office in Genoa (GE), Via G. D'Annunzio, 2/75 - certified email: quiris@pec.it.

The Company has appointed a Data Protection Officer (RDP or DPO), who can be contacted at the following e-mail address: dpo@agnenergia.com.

Personal data processed and origin of data

Handling reports may involve processing ordinary personal data (e.g. personal details, professional role), but, depending on their content and the documentation attached to them, also special categories of personal data (e.g. trade union membership, health data) and personal data relating to criminal convictions and offences.

Any processing of special data categories takes place pursuant to Article 9(2)(b) of the GDPR; any processing of data relating to criminal convictions and offences takes place pursuant to Article 10 of the GDPR, under the terms set out in Article 2g (3)(a).

The personal data to be processed is that provided by the whistleblower and any that may be collected autonomously by the Company in the course of the investigation required to assess the reported events.

Purpose of personal data processing and compulsory provision of data

The Company processes the aforementioned data for the following purposes:

- a) handling reports pursuant to GDPR Article 6(1)(c), Article 6(1)(c), pursuant to Italian Law 179/2019 and Italian Legislative Decree 24/2023;
- b) to pursue the legitimate interest of the Company, pursuant to Article 6.1 f) of the GDPR, consisting of:
 - protecting the Company in judicial or administrative proceedings or in extrajudicial disputes;
 - applying disciplinary sanctions pursuant to the provisions of the organisation and control model adopted by the Company.

The provision of data is not compulsory as reporting is voluntary and the decision on which personal data to provide, also with regard to other parties, is left to the whistleblower.

Protection of confidentiality

In order to protect the confidentiality required by law, only persons expressly authorised by the Company to perform the specific processing will be able to associate the report with the identity of the whistleblower and the other persons mentioned therein.

The investigation undertaken as a result of a report may lead to its dismissal for lack of grounds, or to transmission of the information collected to the appropriate internal or external bodies for appropriate action. If, for the purpose of the investigation, other persons within the Company must be made aware of the report content or of the documents annexed thereto, the identity of the whistleblower, or any other information that may directly or indirectly allow his or her identification shall not be disclosed to such other persons. If the possibility of challenging the offence is based, in whole or in part, on the report received and knowledge of the identity of the whistleblower is indispensable to enable the reported person to defend himself or herself in court, the whistleblower shall be notified in writing by the Company. The report will not, however, be used for disciplinary purposes without the whistleblower's express consent to the disclosure of his or her identity.

The Company will also protect the identity of the persons mentioned in the report until the conclusion of the proceedings initiated as a result of the report, applying the same guarantees as those provided for the whistleblower.

Personal data retention periods

Personal data that is clearly not useful for assessing the report will, where possible, be deleted immediately. The reports and the notification thereof will be kept for five years from the date of notification of the final outcome of the reporting procedure.

Recipients of personal data

Personal data may be processed by the suppliers of the products used to operate the computerised communication channel dedicated to forwarding reports and the platform for archiving them, acting as data controllers. Without prejudice to the Company's reporting and notification obligations, personal data will not be further disclosed to third parties or disseminated.

What are your RIGHTS as a Data Subject?

Data subjects may exercise their rights under data protection legislation in the following ways:

- The whistleblower has the right, at any time, to obtain confirmation of the existence or non-existence of the data provided; he or she also has the right to request rectification of inaccurate personal data and integration of incomplete data and to exercise, where applicable, any other right set out in CHAPTER III of the GDPR. These rights may be exercised exclusively through the communication channel used to make the report (dedicated reporting portal: <https://quirisholding.integrityline.com> or by ordinary mail addressed to Organismo di Vigilanza di QUIRIS S.a.p.a. - Via Gabriele d'Annunzio, 2/75, 16121 Genova GE); requests submitted by other means will not be considered by the Company and will be deleted immediately;
- all other persons, regardless of whether or not their personal data is processed in connection with a report, may exercise their rights exclusively through the Personal Data Protection Authority (Privacy Guarantor), in the manner set out in Article 160 of the Italian Privacy Code. In fact, pursuant to Article 13 of Italian Legislative Decree 24/2023 and the aforementioned Article 2j of the Italian Privacy Code, if exercising the rights set out in Articles 15 to 22 of the GDPR may result in actual and concrete prejudice to the confidentiality of the identity of the whistleblower, such rights may not be exercised, neither by a request to the Company nor by a complaint pursuant to Article 77 of the GDPR.

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