



Privacy notice pursuant to Article 13 of Regulation (EU) 2016/679 (“GDPR”)

To the whistleblower,

the following explains how we collect and process your personal data in connection with the management of whistleblowing reports submitted by you (hereinafter, ‘**Report**’), in accordance with the ‘*Whistleblowing Policy*’ (available at this [link](#)) and in compliance with applicable legislation. This reporting procedure explains how the reporting procedure works, the behaviours possibly object of the Reports and the categories of individuals eligible to issue a Report.

We also inform you that this notice has been drafted in accordance with Legislative Decree No. 24 of 10th March 2023 and French Act No. 2016-1691 of 9 December 2016 as amended by the Act No. 2022-401 of 21 March 2022 and Decree No. 2022-1284 of 3 October 2022, transposing into Italian and French law Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law. This Directive has also been transposed by the other Member States of the European Union, which may have adopted different implementing provisions with regard to, for example, the rights granted to data subjects, the retention periods for reports and other aspects described in this notice relating to the processing of personal data. For this reason, for any further information, please refer to the national provisions in force in the country where the Safilo Group company to which you are reporting is based.

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The data controller is the Safilo Group company to which you intend to send your Report (hereinafter, individually, the ‘**Company**’ or ‘**Data Controller**’). The list of Safilo Group companies acting as data controllers is available at <https://www.safilogroup.com/en/governance/business-ethics/WBCM-Whistleblowing>.

In the light of the processing activities carried out, Safilo Group S.p.A., Safilo S.p.A., Safilo Industrial S.r.l., Safilo Austria GmbH, Safilo Benelux SA, Safilo España, S.L.U., Safilo France Sarl, Safilo GmbH, Safilo Hellas Ottica Single Member S.A., Safilo Nederland BV, Safilo Nordic AB, Safilo Nordic Filial AF Sverige, Safilo Nordic Aktiebolag filial i Finland, Safilo Nordic AB Eesti filial, Safilo Nordic AB filiale Latvia, Safilo Nordic AB filial Lithuania, Safilo Polska sp. z.o.o., Safilo Portugal, Lda, Safilo S.p.A., organizační složka, Safilo S.p.A. – organizačná zložka Slovensko, Safilo S.p.A. Magyarországi Fióktelepe, Safilo-Società Azionaria Fabbrica Italiana Lavorazione Occhiali – S.p.A. Podružnica v Sloveniji have appointed a Data Protection Officer (“**DPO**”), which can be contacted via e-mail at: dpo@safilo.com.

2. PURPOSES, LEGAL BASIS AND NATURE OF THE PROVISION OF PERSONAL DATA

PURPOSES OF THE PROCESSING	LEGAL BASIS AND NATURE OF THE PROVISION OF PERSONAL DATA
Acting on received Reports⁽ⁱ⁾. Your personal data will be processed for the purpose of collecting and managing the Report you have submitted and carrying out the necessary preliminary investigations to verify the validity of the facts reported, as well as for the possible assessment and adoption of appropriate corrective and/or protective measures and disciplinary and/or legal action against the person responsible for the unlawful conduct and exercise or defend rights in court.	(i) Compliance with a legal obligation The provision of your personal data is optional; however, failure to provide such data may make it impossible for the Data Controller to follow up on the Report received, as well as to fulfil the regulatory obligations to which it is subject; Or (ii) for the processing activities carried out by <u>the French entity of the Safilo Group</u>, legitimate interest, when the alert is based on a policy or code of conduct that is not based on a legal obligation.
Retention and documentation of Reports submitted verbally⁽ⁱ⁾. If you decide to submit the Report verbally, the Data Controller, with your express consent, may document the Report by recording it on a device suitable for storage and playback or by means of a written report.	(i) Data subject's consent The provision of your personal data is optional and, in case of refusal, it will not be possible for the Data Controller to record or draw up a memo of your Report.

3. POSSIBLE DISCLOSURE OF YOUR IDENTITY

With reference to processing activities carried out by the Italian entities of the Safilo Group, your identity may be disclosed within the limits and in the cases provided for by Article 12 of Legislative Decree 24/2023, subject to your express consent and upon written notification of the reasons for such disclosure.

With reference to processing activities carried out by the French entity of the Safilo Group, your identity may be disclosed within the limits and in the cases provided for by Article 9 of French Act No. 2016-1691 of 9 December 2016, subject to your express consent and upon written notification of the reasons for such disclosure.

However, elements that could identify you may be disclosed to judicial authorities where the persons responsible for collecting or processing the Reports are required to disclose the facts to those authorities. In such cases, you will be informed, unless such disclosure could jeopardize the judicial proceedings. Written explanations shall then be attached to this information.

Information that could identify the person implicated by a report may not be disclosed to the judicial authority, until the report has been established as well-founded.

4. RETENTION PERIOD

The Data Controller will retain your personal data until a final decision is made, within a reasonable timeframe, regarding the action to take in response to the Report.

In particular, with reference to processing activities carried out by the Italian entities of the Safilo Group, personal data will be retained for the time necessary to manage the Report and in any case for no longer than 5 years from the date of notification of the final outcome of the reporting procedure.

With reference to processing activities carried out by the French entity of the Safilo Group, once the decision is made, the Data Controller may store the data in intermediate archives for a period strictly proportionate to the processing needs and to protect the whistleblower(s), the individuals named, and any third parties. This retention period also takes into account the time required for any follow-up investigations.

If disciplinary or legal proceedings begin, the Data Controller will keep the data until the proceedings end or until the expiry of any deadlines for appeal, if applicable.

Where the law so requires (e.g., for accounting, social security, or tax obligations), or for evidential purposes with a view to a possible control or dispute, or for the purposes of carrying out quality audits of the processes for handling alerts, the Data Controller may store personal data for a longer in intermediate archives.

5. CATEGORIES OF DATA RECIPIENTS

Your personal data will not be disseminated to third parties, but may be communicated, in relation to the processing purposes set out above, to:

- those who can access the data in accordance with the provisions of European Union law or national law;
- the persons involved in the management of the reporting channel, duly appointed as persons authorised to process personal data pursuant to Article 29 of the GDPR and Article 2-*quaterdecies* of Legislative Decree 196/2023 (the “Italian Privacy Code”);
- subjects who perform activities functional to the pursuit of the purposes referred to in paragraph 2, namely consultants, professionals, providers of online platforms and, in accordance with the provisions of the ‘Whistleblowing Policy’, Safilo Group S.p.A., duly appointed as data processors pursuant to Article 28 of the GDPR.

6. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

Your data may be transferred to entities established outside the European Economic Area (‘EEA’), in countries where Safilo Group companies are established, for the purposes indicated above, *i.e.*, to follow up on the Report you have submitted to the relevant Safilo Group company. Your data will be transferred on the basis of adequacy decisions by the European Commission, pursuant to Article 45 of the GDPR or, where this is not available, on the basis of the standard contractual clauses referred to in Article 46 of the GDPR.

The list of third countries to which your Data may be transferred is available at <https://www.safilogroup.com/en/governance/business-ethics/WBCM-Whistleblowing>.

You can obtain a copy of the safeguards adopted for the transfer of personal data outside the EEA

by sending a communication to the following email address: dataprotection@safilo.com.

7. DATA SUBJECTS' RIGHTS

To the extent possible under applicable law, in relation to the processing of your personal data, you, as the data subject, have the right to obtain access to your personal data from the Data Controller; you may also request that the Data Controller rectifies or erases your personal data.

Furthermore, you have the right to obtain the restriction of the processing of personal data concerning you, the right to data portability as well as, with reference to data processing activities carried out by the French entity of the Safilo Group, the right to define instructions regarding the processing of your personal data after your death.

In addition to the above, you have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data carried out pursuant to Article 6(1)(e) or (f), including profiling based on those provisions, as provided for in Article 21 of the GDPR.

Moreover, you have the right to withdraw any consent you may have given, without prejudice to the lawfulness of the processing carried out up to that point.

With reference to data processing activities carried out by the Italian entities of the Safilo Group, the above rights may be exercised within the limits of Article 2-*undecies* of Legislative Decree 196/2023 (*"Italian Privacy Code"*).

Finally, you have the right to lodge a complaint with a supervisory authority or take legal action if you believe that the processing of your data violates the GDPR.

In Italy, the supervisory authority is the Garante per la Protezione dei Dati Personali ("Garante") which you can contact at the addresses mentioned at the following link: [https://www.garanteprivacy.it/diritti/come-agire-per-tutelare-i-tuoi-dati-personali/reclamo#:~:text=del%20Regolamento\)..rpd%40gpdp.it](https://www.garanteprivacy.it/diritti/come-agire-per-tutelare-i-tuoi-dati-personali/reclamo#:~:text=del%20Regolamento)..rpd%40gpdp.it)

In France, the supervisory authority is the Commission Nationale Informatique et Libertés ("CNIL"), which you can contact via the following link: <https://www.cnil.fr/fr/plaintes> or by postal mail at the following address: 3 Place de Fontenoy. TSA 80715. 75334 Paris Cedex 07.

To exercise any of your rights, you may contact the Data Controller by sending a communication to the address indicated at the link <https://www.safilogroup.com/en/governance/business-ethics/WBCM-Whistleblowing>, or, if the Company has appointed a DPO, by sending an e-mail to dataprotection@safilo.com.

Under French law, exercising these rights does not allow individuals named in a Report to obtain information about the whistleblower.

8. AMENDMENTS

This privacy notice has been updated on 01/10/2025.