



Whistleblowing Privacy Policy

1. CONTACT DETAILS OF THE DATA CONTROLLER

The controller of the personal data collected through and as part of the whistleblowing process, governed by the Whistleblowing Procedure available at the following link: <https://www.coima.it/it/chi-siamo/governance> is Coima REM S.r.l., with registered office at Piazza Gae Aulenti 12, Milan (the “Controller” or “Coima”) pursuant to and for the purposes of Regulation (EU) 2016/679 (the “GDPR”).

2. CATEGORIES OF DATA PROCESSED

The Controller shall process personal data concerning the whistleblower (hereinafter also "reporting person"), the reported person and the other protected subjects (the "**Data Subjects**"), in order to acquire information on and assess the alleged unlawful conduct of which the reporting person has become aware, committed by persons interacting with Coima in various capacities, for the purpose of carrying out the necessary preliminary controls aimed at verifying the grounds of the fact being reported and the adoption of consequent measures.

The data collected and processed include, by way of example, personal data and contact details, where the reporting person decides not to remain anonymous, data relating to the employment relationship, the function performed, or the elements characterising the relationship, also relating to other persons concerned or referred to in the report.

In addition, if included in the report, and to the extent that such information is strictly necessary for the reporting process, special categories of data referred to in Art. 9 of the GDPR and judicial data referred to in Art. 10 of the GDPR may be processed.

3. DATA PROCESSING METHODS

The data provided in connection with the report will be processed mainly by electronic and manual systems in accordance with the principles of fairness, loyalty and transparency laid down in the applicable data protection legislation and the whistleblowing provisions, protecting the confidentiality of the person to whom the data refer and adopting technical and organisational security measures to ensure an adequate level of security (e.g. preventing access by unauthorised persons except where required by law, or ensuring the restoration of access to data in the event of physical or technical incidents).

4. PURPOSE AND LEGAL BASIS OF PROCESSING

The data provided by the reporting person are processed by the Controller for the purpose of handling the report and carrying out the necessary investigations aimed at verifying the grounds of the fact reported and the adoption of consequent measures. In particular, data will be processed for the following purposes:

- a) to allow for registration on the IT platform adopted by the Controller to facilitate report handling, whilst ensuring the highest standards to protect the confidentiality of the reporting person and of the persons concerned;
- b) to enable the reporting person to make a report 1) via the platform made available by the Controller; 2) by ordinary mail, in the manner indicated in the procedure; 3) by means of a physical meeting;
- c) to enable the reporting person to make an anonymous report, taking care to remove any data that might identify the reporting person even indirectly;
- d) to handle and assess the report pursuant to Legislative Decree no. 24/2023 transposing Directive (EU) 2019/1937 in Italy;
- e) to investigate and assess the report with the support, where necessary, of third-party professionals or other corporate resources;

- f) to fulfil obligations provided for by law or EU legislation;
- g) for the defence or establishment of legal claims in civil, administrative or criminal proceedings.

The legal basis for the processing operations referred to in points a)-f) above is compliance with a legal obligation to which the Controller is subject (Art. 6, para. 1, letter c) of the GDPR). The legal basis for the processing operation referred to in point g) above is the legitimate interest of the Controller (Art. 6, para. 1, letter f) of the GDPR).

The provision of data is necessary for the achievement of the above-mentioned purposes, with the exception of identifying information on the reporting person, the provision of which is voluntary, since anonymous reports can also be submitted. Failure to provide information or the provision of partial or inaccurate information may make it impossible to handle the report and, in the case of anonymous reports, to ensure appropriate protection for the reporting person.

5. COMMUNICATION OF DATA

For the pursuit of the purposes indicated above, any personal data contained in the reports will be collected, processed and handled by the Whistleblowing Manager identified by Coima in its Compliance department (or in the Board of Statutory Auditors if the reports concern staff from the Compliance department) as well as by anyone who contributes, in various capacities, to the correct execution of the Whistleblowing Procedure, authorised to process such data (e.g. members of the Supervisory Board in relation to impactful reports within the meaning of Law 231/2001) or appointed as data processors pursuant to Article 28 of the GDPR (e.g. the operator of the online reporting platform). These persons will be specifically identified by the Controller, who will also provide adequate instructions on the methods and purposes of processing and ensure that they are subject to confidentiality and privacy obligations.

By reason of its prominent role in the compliance system of the Controller, Coima's Supervisory Board shall be promptly informed of the receipt of any new report that is potentially relevant under Model 231 adopted by the Controller.

To the extent permitted by Legislative Decree 24/2023, the Controller may communicate personal data, insofar as necessary for the pursuit of its processing purposes, to third parties belonging to the following categories:

- competent authorities (e.g. the ANAC [Italian National Anticorruption Authority] and the judicial authority). These entities will act as autonomous data controllers;
- companies/bodies/professionals/associations providing, by way of example, consultancy and support for the provision of services, etc., who will act, as the case may be, as autonomous data controllers or as data processors on the basis of a specific agreement on the processing of personal data concluded pursuant to Art. 28 of the GDPR.

6. DATA TRANSFER

Personal data are processed by Coima and its suppliers inside the European Union. Should personal data be transferred outside the European Economic Area for processing purposes, the Controller shall adopt adequate levels of protection and safeguards, including contractual safeguards, in accordance with the applicable rules, such as the European Commission's adequacy decisions for given countries or the stipulation of contractual clauses.

7. DATA STORAGE

Reports and the corresponding documentation (including any recordings, where a direct meeting is used for the report and the reporting person authorises its recording) will be kept, in compliance with the principle of minimisation, for the time necessary to process the report and in any case no longer than 5 years from the date of notification of the final outcome of the reporting procedure, in compliance with the confidentiality obligations laid down by applicable legislation, except where there arises the specific need to defend or protect the rights and/or legitimate interests of Coima or third parties, including in the event of complaints, litigation or pre-litigation. At the end of the storage period, the said documentation will be deleted.



Personal data that are manifestly not relevant for the processing of a specific report will not be collected in the file of reports or, if accidentally collected, will be deleted without undue delay.

8. RIGHTS OF DATA SUBJECTS

In the cases expressly provided for by law and where applicable and subject to the limitations identified by the relevant provisions of law and, in particular, by Art. 2-undecies of Legislative Decree 196/2003, Data Subjects may exercise the rights provided for in the GDPR. In particular, Data Subjects have the right to:

- obtain confirmation as to whether or not their personal data are being processed and, if this is the case, to request access to information on data processing from the Controller (e.g. purpose, categories of data processed, recipients or categories of recipients of data, storage period, etc.);
- request the rectification of inaccurate or incomplete data;
- request that the Controller delete the data (e.g. if the personal data are no longer necessary for the purposes for which they were collected, or if the consent on which data processing is based is withdrawn, etc.);
- request the restriction of processing (e.g. if the data subject challenges the accuracy of data; if data processing is unlawful and the data subject objects to the deletion of the personal data; if the data are necessary for the exercise or defence of a right of the data subject in court, even if the controller no longer requires them; when the data subject exercises the right to object to data processing, for the time necessary to verify whether legitimate reasons exist);
- receive personal data concerning them in a commonly used and machine-readable format (e.g. PDF) and send the data to another controller, or obtain their direct transmission from one data controller to another, if technically feasible (so-called 'data portability').

Data subjects have the right to object to the processing of their personal data, in whole or in part, for legitimate reasons.

Those rights may be exercised directly by sending a communication to the following certified email address: privacy@coimasrl.com

Finally, if data subjects consider that data have been processed in violation of legislation on the protection of personal data, they have the right to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

9. COMMUNICATION AND PUBLICATION

This policy is communicated to data subjects by appropriate means of communication.

In particular, it is displayed and made easily visible in the workplace as it is published on the corporate website <https://www.coima.it/it/chi-siamo/governance>

Issued on 17 December 2023