

PRIVACY POLICY (Whistleblowing)

Pursuant to articles 13 and 14 of EU Regulation no. 679/2016 called “General Data Protection Regulation” (hereinafter “**GDPR**”) and to art. 13 of Italian Legislative Decree no. 196-2003 called “Privacy Code”, CAME S.p.A., as data controller of personal data (the “Data Controller”) informs you that the processing of your personal data – pursuant to “CAME whistleblowing management procedure” (hereinafter “**Procedure**”) - related to the report sent to the Data Controller or to another subsidiary, associated company or company belonging to the same group of companies (hereinafter the “**Company**”). The report is a communication sent by any tools at your disposal (for example Whistleblowing Platform, postal mail, e-mail). The report is related to potential illicit or irregular conducts by persons related in various capacities to Data Controller and/or a Company. These conducts can be potential violations of laws, regulations, Authorities’ measures, policies and internal corporate procedures, Ethic Code and Organisational, Management and Control Model and they can be a potential cause of damage, even just to the image.

1. PURPOSE AND LEGAL BASES OF THE PROCESSING

Your personal data, relating to any information you provide in the report and/or any information that may be acquired during the preliminary investigation, will be processed by the Data Controller for the following purposes:

a. Fulfilment and execution of any obligation required by the law in force and by the Authorities:

The Data Controller will process the personal data acquired for the purpose to:

- Fulfil the legal obligations of the Data Controller and the Companies;
- Give effective application to the Organisational, Management and Control Model pursuant to Legislative Decree 231/01, as well as to the CAME Code of Ethics, in order to prevent illicit and/or irregular conduct, which can potentially cause a damage to the Data Controller and / or to the Companies, as well as to third parties;
- follow up specific requests received from the competent administrative or judicial Authorities, and more generally from Public Authorities, always in accordance with the legal obligations.

b. Pursuit of Data Controller or third party’s legitimate interests

The Data Controller will process personal data to verify, exercise and defend its own right or legitimate interest, as well as that of one of the Companies or a third party, in any competent court.

The legal basis of the processing of the personal data is therefore represented by the right of defence and the legitimate interest in ensuring effective prevention of illegal behaviour, that can be potentially damage CAME’s integrity, image and reputation.

2. CONSENT

Your personal data acquired by means of the report and/or collected as part of the management of the report will be processed without the necessary acquisition of your consent, because the legal basis of the data processing consists in a fulfilment of a legal obligation as well as the exercise of a right or of legitimate interest.

CAME S.p.A.

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3. CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA AND TRANSFER OF DATA TO THIRD COUNTRIES

In accordance with the provisions of the Procedure, the Whistleblowing Committee and the Supervisory Body (hereinafter "**Data Processors**") are responsible for the management of the report and for this purpose they are authorized for the processing of your personal data. The Data Processors only for the purposes described above may require the support of employees and/or internal collaborators of the Data Controller and of the Companies during the investigative activities aimed to verify the validity of the report. These internal collaborates will process the personal data acquired as **Authorized persons**.

The Data Controller provides adequate written instructions regarding the processing methods and ensures that the authorized persons to process personal data are subject to specific confidentiality obligations regarding the data acquired. The Data Controller may communicate the personal data collected to third parties belonging to the following categories:

- administrative and judicial public authorities and law enforcement agencies, who will act as independent data controller;
- external consultants, experts and professionals appointed by the Data Processors pursuant to art. 28 of the GDPR.

The Data Controller ensures that the transfer of your personal data to these recipients concerns only the data, which are necessary to pursue the abovementioned purposes.

You can request information about the Data Processor sending an e-mail to the following email address: privacy@came.com.

Without prejudice to any specific legal obligation, the personal data collected will not transferred, nor will they be received in non-EU countries.

The management and storage of personal data takes place on servers located within the European Union owned and/or available to the Data Controller and/or third-party companies duly appointed as Data Processors.

4. CATEGORIES OF PERSONAL DATA

In relation to the report Data Controller may collect:

- the "special" categories of personal data provided for in Article 9 of GDPR, which can reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or concern health or a natural person's sex life or sexual orientation;
- Personal data relating to criminal convictions and offences.

The personal data will be processed for the sole purpose of investigating the reports sent and also in accordance to the principles of lawfully, proportionally and necessity provided for the law in force.

5. STORAGE TIMES

The personal data related to the report are collected in paper and digital archives owned by the Data Controller and they are protected by security measures to ensure the integrity and traceability. The Data Controller collects the data only for as long as is needed to achieve the abovementioned purposes. Your personal data may be stored for more time if this is required by law to fulfil legal obligations or for the protection in the judicial court.

1. METHOD OF PROCESSING

The processing of your personal data is carried out by means of the operations indicated in art. 4 no. 2) of the GDPR and precisely: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The processing of the provided data is executed via paper, automated or electronic means able to guarantee confidentiality, security and the integrity according to what is known as the *data protection by default*.”, which means we handle your data in the most secure way possible to mitigate the risk of diffusion.

The personal data will be processed in order to manage the report according to the Procedure adopted to ensure the right application of the current legislation. The Data Controller reserves the right to process the personal data acquired in relation to the verification and assessment activities on the validity of the facts reported. These activities are carried out by internal investigations and possibly for the application of disciplinary system, within the limits provided for by the legislation in force.

2. DATA CONTROLLER

The Data Controller is CAME S.p.A., Fiscal Code and Vat Code 03481280265 – with registered office at Via Martiri della Libertà, 15, 31030 Dosson di Casier (TV) - Italy.

8. RIGHTS OF THE DATA SUBJECT

We inform you about your rights:

- right of access to your data, i.e. the right to obtain from the Data Controller confirmation about the current processing of you data and, whether required by you, the access;
- right of rectification and cancellation, i.e. the right to obtain – based legitimate grounds - the rectification of inaccurate personal data and/or the integration of incomplete personal data and/or cancellation;
- right to restriction of processing, i.e. the right to obtain restriction of processing for legitimate reasons;
- right to Data portability, i.e. the right of the user to receive its personal data in a structured, commonly used and machine-readable format for the transmission to another;
- right to withdraw your consent at any time. The withdraw of the consent does not affect the legitimacy of the processing carried out before withdrawal.
- Right to object, that is right to object to processing of personal data, included the data used for profiling or marketing purposes, for legitimate reasons;
- right to complain to the competent supervisory authority in case of unlawful processing of the data or to take legal actions.

Within the limits of the specific legislation and according to the law in force, the Data Controller shall restrict or delay the exercise of the abovementioned rights, if there is a risk of an actual damage to the right related to the confidentiality on



both the whistleblower's and the reported party's identity. The Data Controller has also the power to restrict and delay the abovementioned rights, if there is an actual risk to compromise the possibility to verify the validity of the facts reported. Except in those cases expressly mentioned in the Procedure, in any case the whistleblower's identity cannot be revealed to the reported party or any other third party, due to the exercise of their right of access. The Data Controller defines specific tools able to guarantee that whistleblower's identity is not revealed to the reported party and/or any third party, in order to prevent retaliatory and/or discriminatory actions as the result of the report. The Whistleblower's identity shall be revealed only if this necessity arises because of a legal obligation, or if requested by the judicial authorities, and in any case within the limits of the law in force.

Please, send your requests to: CAME S.p.A. at the following email address: privacy@came.com