

Pursuant to art. 13 GDPR and Law 179/2017, Danieli & C. Officine Meccaniche S.p.A. (hereinafter, “Danieli”) provides this information about the processing of your Personal Data for the management of the Whistleblowing report you submitted concerning behaviors in breach of internal and external rules governing the activity of Danieli and the Group, including the Code of Ethics and the Model 231/01 as well as any other illegal conduct which may result in a financial, property and/or reputational damage for the Danieli Group.

Here below, the following expressions are defined: **(i)** Data Controller and Data Protection Officer; **(ii)** types of Personal Data processed; **(iii)** nature of data provision and consequences of refusal; **(iv)** purpose and legal basis; **(v)** categories of data recipients; **(vi)** processing modalities; **(vii)** people authorized; **(viii)** retention period; **(ix)** transfer of Personal Data; **(x)** rights of the Whistleblower (hereinafter also the “Data Subject”, including the right to lodge a complaint to supervisory authority.

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**DATA CONTROLLER**

Company name: **Danieli & C. Officine Meccaniche S.p.A.**  
Registered office: Via Nazionale, n. 41, 33042 - Buttrio (UD).  
Italy

**DATA PROTECTION OFFICER**

[dpo@danieli.com](mailto:dpo@danieli.com)

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**PROCESSED PERSONAL DATA (“COMMON DATA”)**

According to Whistleblowing Guideline, the processed Personal Data are, where provided, Personal Data, contact details and further information related to the Whistleblowing report submitted. Data processing is carried out by means of electronic and paper formats in order to ensure security and confidentiality measures.

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**SPECIAL CATEGORIES OF PROCESSED PERSONAL DATA (“SENSITIVE” DATA)**

In relation to the Whistleblowing report submitted, also data concerning health and data revealing religious beliefs, sexual orientation and/or affiliation to political parties and other trade unions may be assessed.

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**SPECIAL CATEGORIES OF PROCESSED PERSONAL DATA (“CRIMINAL DATA”)**

As regards the Whistleblowing report submitted, also data concerning criminal convictions and/or offenses may be assessed.

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**NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSAL**

Data are collected from the Data Subject (i.e. provided by you); data provision shall not affect the Whistleblowing report since you are always entitled to make an anonymous report.

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**PURPOSE AND LEGAL BASIS**

The Personal Data provided shall be processed exclusively for the preliminary investigation of the Whistleblowing report, in compliance with the provisions of the Whistleblowing Guideline and Directive (EU) 2019/1937. In order to ensure the confidentiality of the Whistleblower throughout the report management, the identity of the Whistleblower shall be known only by the Reporting Committee of Danieli. Except in cases where there is a liability for slander and defamation pursuant to the provisions of the Criminal Code or Art. 2043 of the Civil Code and cases where anonymity is not enforceable by law (e.g. criminal, tax or administrative investigations, inspections by supervisory bodies), the Whistleblower’s identity shall be protected in any context following the report. Therefore, with the exception of the above, the Whistleblower’s identity shall not be unveiled without his/her express consent and all those who receive or are involved in the Whistleblowing report management shall protect its confidentiality. The legal basis of such processing is Art. 6, paragraph 1, letter c), of the Regulation (fulfilment of a legal obligation to which the Data Controller is subject). Personal Data processing is based on principles of fairness, lawfulness, transparency and protection of the Whistleblower’s confidentiality and rights, as well as further principles provided for in Art. 5 of GDPR.

<b>CATEGORIES OF DATA RECIPIENTS</b>	<p>The recipient of Personal Data is the Reporting Committee of Daniemi which, in compliance with the applicable legislation and the Whistleblowing Guideline adopted by the Data Controller, shall ensure the confidentiality of the Whistleblower's identity. During the investigation phase of the report legitimacy, where it is necessary for requirements related to preliminary investigations, Personal Data may be submitted to other structures and/or departments of the Data Controller, such as the Supervisory Board (OdV). In such a case, behavioral duties aimed at ensuring the confidentiality of the identity of the person involved to support the Reporting Committee shall be implemented. Personal Data may be revealed to the manager of the company department in charge of disciplinary proceedings and/or to the reported person only in cases where the Whistleblower has given his/her explicit consent or the objection is exclusively based on the Whistleblowing report and the knowledge of the Whistleblower's identity is an absolute precondition for the defense of the reported person.</p> <p>If the conditions are met, Personal Data may also be communicated to third parties included in the following categories: a) consultants (i.e. law firms and/or other); b) public institutions and/or authorities, Judicial Authority, police bodies, investigative agencies.</p>
<b>PROCESSING MODALITIES</b>	<p>Pursuant to Article 5 of the GDPR, Personal Data of which Daniemi becomes aware for the purposes of this procedure shall be processed in a lawful, appropriate and transparent manner towards the Data Subject, collected for specified, explicit and legitimate purposes and then consistently processed through the use of automated procedures with encryption tools to ensure the confidentiality of the Whistleblower's identity.</p> <p>The Data Controller ensures that all reasonable measures are taken to promptly delete or rectify inaccurate Personal Data in relation to the purposes for which they have been processed, as well as their retention in a form that allows the identification of Data Subjects for a period not exceeding the achievement of the objectives for which they are processed. These shall be processed so as to ensure appropriate security of Personal Data, including protection against unauthorized or illegal processes and loss or destruction or damage, through technical and organisational measures.</p>
<b>PEOPLE AUTHORIZED</b>	<p>In accordance with the considerations above, Personal Data may be processed also by the employees of the company departments aimed at pursuing the above-mentioned purposes, who have been expressly authorized for processing and have received proper operational instructions.</p>
<b>DATA RETENTION PERIOD</b>	<p>The Personal Data collected for the above-mentioned purposes shall be retained for a period of nine months or for the time required to assess the legitimacy of the Whistleblowing report, except in cases where disciplinary measures are adopted and/or any litigations are initiated following the report. Later, such Personal Data shall be destroyed or provided in an anonymous form (pseudonymisation), if necessary for statistical or logging purposes.</p>

**AFTER THE ABOVE-MENTIONED RETENTION PERIOD, PERSONAL DATA SHALL BE DESTROYED, DELETED OR RENDERED ANONYMOUS IN ACCORDANCE WITH TECHNICAL ERASURE AND BACKUP PROCEDURES.**

<b>TRANSFER OF PERSONAL DATA</b>	<p>Personal Data may be transferred abroad to countries outside the EU where Daniemi has established subsidiaries. In particular:</p> <ol style="list-style-type: none"><li>Countries outside the EU "where the data protection level was considered appropriate by the European Commission pursuant to Art. 45 of the GDPR";</li><li>Countries outside the EU others than those indicated in the previous point "after the signature of the Standard Contractual Clauses adopted/approved by the European Commission pursuant to Art. 46, par. 2, lett. c) and d)"; a copy of the above guarantees may be obtained by submitting a specific request to the Data Controller according to the methods provided for in the paragraph entitled "Rights of the Whistleblower - Complaint to supervisory authority";</li><li>Countries outside the EU, pursuant to Art. 49, lett. b) of the GDPR, i.e. for the performance of a contract between the Data Subject and the Data Controller or the implementation of pre-contractual measures taken at the Data Subject's request.</li></ol>
<b>RIGHTS OF THE WHISTLEBLOWER -</b>	<p>Contacting the DPO by e-mail at: <a href="mailto:dpo@daniemi.com">dpo@daniemi.com</a>, the Data Subject may:</p> <ul style="list-style-type: none"><li>request access to, rectification, integration or erasure of Personal Data concerning him/her, as well as the processing restriction, from the Data Controller;</li></ul>

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**COMPLAINT TO SUPERVISORY  
AUTHORITY**

- receive the data in a structured, commonly used and machine-readable format, and transmit them to another Data Controller without hindrance (“right to data portability”).
- The Data Subject has also the right to lodge a complaint to the competent supervisory authority that can be contacted at the following link: [www.garanteprivacy.it](http://www.garanteprivacy.it)

Buttrio, March 2022