Report Form

Reporting under Procedure C04.00A updated in November 2023

AUTHOR OF THE BEHAVIOR SUBJECT OF THE REPORT

DETAILED DESCRIPTION OF THE BEHAVIOR GIVING UP THE REPORT

DATA OF THE REPORTING PERSON (IN CASE OF NOT ANONYMOUS REPORTING)

First name:

Surname:

Department or office (if Bormioli Luigi employee):

Telephone:

E-Mail:

Date_____Sign _____

The Privacy Policy made pursuant to art. 13 and 14 of the GDPR as part of the reporting of violations pursuant to Legislative Decree No. 24/2023 is attached to this reporting form and is also published on the company intranet.

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PRIVACY POLICY

pursuant to art. 13 and 14 of EU Regulation 2016/679, concerning the processing of personal data in the context of the reporting of violations pursuant to Legislative Decree No. 24 of 10 March 2023

Bormioli Luigi S.p.A. (the "Company") has established an internal channel for reporting violations (the "Reporting Channel"), as prescribed by Legislative Decree no. 24 of 10 March 2023. The Reporting Channel provides for the possibility to report violations of which the reporting has become aware within the context of the Company's work both through access to the software "My Whistleblowing" (the "Software") whether by sending a report by e-mail in some specific cases.

Therefore, the Company is called upon to process the personal data of reporting parties and other parties involved in the report (the "Processing"). The Company, as data controller (the "Data Controller"), pursuant to and for the purposes of art. 13 and 14 of EU Regulation 2016/679 (the "GDPR"), provides the following information and communicates that the processing of personal data of reporting subjects and other parties involved in the report (the "Data Subjects" or, individually, the "Data Subject") is based on the principles of correctness, lawfulness, transparency, integrity and confidentiality, as well as the protection of the rights of the Data Subject under the GDPR, Legislative Decree no. 196/2003 (the "Privacy Code"), as amended by Legislative Decree 101/2018, and the provisions of the Supervisory Authorities.

1. Subject of the Processing and categories of data processed.

The Data Controller collects and processes the data necessary for the management of the report, communicated by the Data Subject, by the reporting entity or collected in order to manage the report.

In particular, the processing may concern the following categories of data:

- name, surname, e-mail address. Please note that all data from which the identity of the reporting agent can be deduced, even indirectly, will be covered by the utmost confidentiality and will be processed only if this is essential for the correct management of the alert and subject to the consent of the reporting agent, where such consent is necessary pursuant to Legislative Decree. No. 24/2023;
- Software access credentials;
- information contained in the report and relating to the management process of the report, which may also contain particular data pursuant to art. 9 of the GDPR, including data and information suitable for disclosing racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership, health status, sexual life or sexual orientation (the "Particular Data") or may contain judicial data pursuant to art. 10 of the GDPR, including data and information regarding criminal offences and convictions or related security measures (the "Judicial Data").

The Particular Data, the Judicial Data and all other personal data that will be the subject of the Processing are, below, jointly defined also as the "Data".

Data that are manifestly not useful for the processing of a specific report are not collected or, if collected accidentally, are deleted immediately.

2. Purpose and legal basis of the processing

The purpose of the Data Processing is exclusively the management of reports received through the Reporting Channel.

The legal basis of the Processing of Personal Data, excluding Particular Data and Judicial Data, is that provided by art. 6, paragraph 1, lett. c), of the GDPR and, that is, the need to fulfil the obligations to which the Data Controller is subject pursuant to Legislative Decree no. 24/2023.

The legal basis of the Processing of Particular Data is that provided by art. 9, paragraph 1, lett. g) of the GDPR, as the Processing is necessary for reasons of relevant public interest on the basis of European Union law (having been the D.lgs. n. 24/2023 issued in implementation of the EU Directive n. 1937/2019) and Italian law (as the Processing is necessary to ensure the protection of subjects who report violations of which they have become aware within their working context pursuant to Legislative Decree no. 24 /2023).

The legal basis of the Judicial Data Processing is that provided for by art. 10 of the GDPR, as the Processing is authorized by European Union law (EU Directive n. 1937/2019) and by Italian law (D.lgs. n. 24/2023).

3. Method of treatment and storage period.

The Data Processing is carried out by means of the operations indicated by art. 4, par. 1, n. 2) of the GDPR and consists of the collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, comparison or interconnection, limitation, deletion and destruction of Data.

The Data are processed by electronic and computer means, partly automated, as well as by manual and analogue means. In no case, the Processing carries out a decision-making process or profiling of the Data Subject.

The Processing is carried out according to criteria aimed at ensuring maximum confidentiality of both the identity of the reporting agent and the content of the report. In addition, the Processing is performed only by subjects specifically appointed, authorized and instructed to the processing pursuant to art. 29 of the GDPR and art. 2-quaterdecies of the Privacy Code, or designated as Data Processors pursuant to art. 28 of the GDPR.

In any case, the Data will be subject to Processing only to the extent necessary for the fulfilment of the Data Controller's obligations and for the time necessary to achieve the purpose for which the information is collected, that is, the management of the report. In this regard, if the outcome of the alert procedure does not result in disciplinary proceedings, an alert to the competent authorities, an out-of-court legal action and/or judicial proceedings against the person who has been alerted, the data shall be deleted within two months of the end of the reporting procedure. In any case, the Data may not be stored for more than five years.

4. Consequences of failure to provide Data.

The provision of the Data of the reporting subject is not mandatory, as the report can be sent via the Reporting Channel also in anonymous form. However, we inform you that the management of the report may result in the identification of the Data of the reporting subject, in which case the Processing will take place under the conditions and with the safeguards described in this Privacy Policy.

5. Subjects or categories of subjects to whom the Data may be communicated and scope of communication.

In relation to the purpose of the Processing indicated above, and within the limits strictly relevant to the same, the Data Subject's Data will be or may be communicated to the following categories of subjects:

a) to the provider of the Software. Please note that the Software provider will process the Data contained in the report in encrypted format and exclusively in order to ensure its storage;

b) the financial, judicial and other public authorities, where required by law or at the request of those public authorities;

c) to law firms/professionals for the management of any disputes;

d) to subjects exercising control activities, including the Board of Statutory Auditors and the Supervisory Body.

The third party supplier of the Software is Mygo S.r.l. with registered office in Rome, Piazza Crati, 20, fiscal code and VAT no. 14356531005. Mygo S.r.l. has been appointed Data Processor with the act of appointment of 22/06/2023 pursuant to art. 28 of the GDPR.

The above mentioned subjects, to which the Data Subject will be or may be communicated, in the event that they have not been designated in writing as Data Processors, will process the Data as Data Controllers pursuant to the GDPR, in complete autonomy, being unrelated to the original processing performed by the Data Controller.

The updated list of the subjects indicated and the Data Processors is provided at the request of the Data Subject.

6. Data Transfer.

The Data Subject's Data will not be disseminated, unless the Data Controller must disclose them or transmit them to third parties in order to fulfil an obligation deriving from law or from an order of public authorities.

The Data are processed exclusively within the EU territory. As regards the storage of Data, it should be noted that:

- Data relating to reports sent via the Software are stored in digital format by the third party provider of the Software on Microsoft Azure servers in Italy;
- Data relating to reports sent by e-mail are stored by the Contact Person who manages the report in digital format at the cloud email service managed by the Microsoft provider on datacenters in the EU territory.

7. Rights of the Data Subject.

Articles. 15 and ss. of the GDPR confer on the Data Subject the right to:

- obtain confirmation of the existence or not of Data concerning him, even if not yet recorded, and their communication in an intelligible form;
- obtain the indication: a) of the purposes and methods of processing; b) of the categories of Data processed and their origin; c) of the identification details of the Data Controller, of the persons in charge and/or of the managers; d) the subjects or categories of subjects to whom the Data may be communicated or who may become aware of them in their capacity as responsible persons or in charge; c) the period of storage of the Data or, if it is not possible to identify it, the criteria used to determine this period; f) the existence of the right to request the rectification or cancellation of the Data, the limitation or opposition to the processing of the Data; g) the right to lodge a complaint with the Data Protection Authority; h) the existence of an automated decision-making process, including profiling and, in such cases, the logic applied, the importance and expected consequences of such processing for the Data Subject; i) the existence of adequate guarantees pursuant to art. 46 of the GDPR in case of transfer of Data abroad; l) the right to obtain a copy of the Data processed;ottenere: a) la rettifica ovvero l'integrazione dei Dati ai sensi dell'art. 16 del GDPR; b) la cancellazione (cd. diritto all'oblio) dei Dati trattati ai sensi dell'art. 17 del GDPR;
- obtain the limitation of the processing of Data pursuant to art. 18 of the GDPR;
- receive in a structured format, of common use and readable by automatic device the Data concerning the Data Subject provided to the Data Controller and transmit such Data to another data controller without hindrance by the Data Controller to which they were provided pursuant to art. 20 of the GDPR;
- oppose, at any time, for reasons related to its particular situation, including profiling, the processing of Data concerning the Data Subject, pursuant to art. 21 of the GDPR;
- not be subject to a decision based solely on automated processing, including profiling, pursuant to art. 22 of the GDPR, except in the cases provided for by the same standard;
- revoke consent to the processing at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation, if the consent is the legal basis of the processing of Data pursuant to art. 6, par. 1, lett. a) and 9, par. 2, lett. a) of the GDPR.

In accordance with the provisions of art. 2-undecies of the Privacy Code, the rights of the Data Subject referred to in art. 15 and ss. of the GDPR may be subject to limitations if the exercise of these rights could result in effective and concrete prejudice:

- interest protected under the provisions on money laundering;

- the interests protected under the provisions on support for victims of extortion;
- activities carried out by a public entity, other than public economic entities, on the basis of express legal provisions, for exclusive purposes relating to monetary and currency policy, the payment system, the supervision of financial and credit intermediaries and markets and the protection of their stability;
- the conduct of defensive investigations or the exercise of a right in court;
- the confidentiality of the identity of the reporting agent;
- the interests protected in the field of taxation and the conduct of activities to prevent and combat tax evasion.

In the cases listed above, the exercise of the rights of the Data Subject may be delayed, limited or excluded for the time and insofar as this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the Data Subject, in order to safeguard the interests for which the exercise of rights should be restricted.

In the event that the exercise of the rights of the Data Subject is restricted, the Data Controller will send the Data Subject, without delay, a communication specifying the reasons for the limitation, unless such communication would jeopardise the purpose of the restriction.

In any case, the Data Subject may exercise their rights also through the Data Protection Supervisor in the manner referred to in art. 160 of the Privacy Code.

To know the detailed and constantly updated list of subjects to which the Data Subject can be communicated, as well as to exercise the rights referred to in art. 15 and ss. of the GDPR, the same may contact the Data Controller at the following addresses:

Bormioli Luigi S.p.A.
Viale Europa, 72/A
43122 - Parma
Fiscal code. 08836270150
Vat Number 01612420347
PEC: Gruppobormioliluigi@CERT.bormioliluigi.com

E-mail: titolare.privacy@bormioliluigi.com

https://www.bormioliluigi.com/

Sending the report through the Software will mean that the Data Subject has read and accepted this Privacy Policy, as the Software does not allow the transmission of reports without prior viewing and acceptance of the Privacy Policy.

The sending of the report by e-mail will also mean that the Data Subject has read and accepted this Privacy Policy, as the aforementioned document is published on the company's intranet.