








INFORMATION ON THE PROCESSING OF PERSONAL DATA

WHISTLEBLOWING - PERSONS INVOLVED

Summary information

	Data controller	L.M. dei F.lli Monticelli S.p.A. Via Giuggioli, 30, Osimo (AN) Tel. +39 071 7230252 email info@monticelli.it
	Privacy contact point	privacy@monticelli.it
	Processed data (optional processing)	<ul style="list-style-type: none">personal data contained in the report (identification, contact, professional, etc.)any personal data categories that qualify as special
	Primary purpose of processing	acquisition and management of reports of wrongdoing and for the management of any preliminary investigation for subsequent proceedings
	Legal basis of the processing:	<ul style="list-style-type: none">fulfilment of a legal obligation to which the data controller is subjectlegitimate interest of the data controllerthe performance of a task in the public interest or in connection with the exercise of public authority
	Recipients of personal data	<ul style="list-style-type: none">public or private entities in the event of violations of applicable regulationspossible consultants and professionalsSupervisory Body
	Data retention period	<ul style="list-style-type: none">processing of the report and possible adoption of consequent disciplinary measures5 years from the date of communication of the final outcome of the reporting procedure

INFORMATION ON THE PROCESSING OF PERSONAL DATA

WHISTLEBLOWING - PERSONS INVOLVED

L.M. dei F.lli Monticelli S.p.A. informs the persons reported ("persons concerned") about the processing of their personal data within the scope of the activity of acquisition and management of reports of wrongdoing (so-called 'whistleblowing').

It should be noted that such persons have the right to be informed of the report concerning them exclusively within the framework of the proceedings that may be initiated against them, following the conclusion of the preliminary activity of verification and analysis of the report and in the event that such proceedings are based in whole or in part on the report. This limitation of the right to information arises in order to protect the performance of investigative activities, with particular reference to any subsequent investigations, including those of a criminal nature (Article 14(5)(b) and (d) of the GDPR).

This information notice supplements *the information notice on the processing of personal data - whistleblowing* and is provided pursuant to Article 14 Regulation (EU) 2016/679 on the protection of personal data ("GDPR") and Legislative Decree No. 24 of 10 March 2023, in accordance with the principles of transparency and fairness and in compliance with the rights of the data subjects.

DATA CONTROLLER

Which processes personal data and which the data subject can contact to obtain information and exercise their rights

The Data Controller is L.M. dei F.lli Monticelli S.p.A., Via Giuggioli, 30, Osimo (AN), established in the European Union, which can be contacted at the following addresses: telephone +39 071 7230252, email info@monticelli.it, PEC Im.monticelli@pec.it

PRIVACY CONTACT POINT

L.M. dei F.lli Monticelli S.p.A. has a privacy contact point, which can be contacted for any information concerning the processing of personal data, the exercise of the data subjects' rights, the security policies and the measures adopted, and the list of persons in charge of processing personal data.

The contact point can be reached at: privacy@monticelli.it

DATA SUBJECTS

The subjects whose data are processed and whose rights are recognised

The data subjects are the persons concerned (reported persons).

SOURCE OF DATA

The origin of the personal data

Personal data on reported persons are acquired upon receipt of the report and the related information provided by the whistleblower.

PERSONAL DATA CATEGORIES

What data are processed

The processing relates to personal data collected through the report and may concern personal data (e.g. name, surname, place of birth), contact data (e.g. email address, telephone number, postal address), professional data (e.g. job title, area of responsibility, company role, type of relationship with the

organisation, profession) and any other information relating to the reported persons that the whistleblower deems necessary to substantiate the report.

In connection with the need to handle the report, written comments and documents may be obtained, also at the request of the reported persons.

The data received in connection with the report may be supplemented by data that may already be available to the Data Controller or acquired in the course of activities aimed at verifying the merits of the complaint and what is described therein, always in compliance with the law.

In connection with the subject matter of the report, personal data that can be qualified as special (i.e. data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data intended to uniquely identify a natural person, data concerning a person's health or sex life or sexual orientation) may be processed

With the exception of specific legal provisions, including processing for the purpose of preventing corporate criminal liability in accordance with the provisions of Legislative Decree 231/2001 and with the provisions of Article 10 of the GDPR, no personal data relating to criminal convictions and offences will be processed, and L.M. dei F.lli Monticelli S.p.A. will process such data only if they are freely provided by the person reporting the offence as characteristic elements of the report.

If there is a need to acquire and process data of a specific nature or relating to criminal convictions and offences, it will be the responsibility of the data controller to inform the persons concerned accordingly.

PURPOSE AND LEGAL BASIS OF PROCESSING

Why are data processed?

Personal data are processed for the purposes of acquiring and managing reports of unlawful acts and for the management of any preliminary investigation for subsequent proceedings.

The legal basis for such processing is Article 6(1)(c) of the GDPR (fulfilment of a legal obligation to which the Data Controller is subject).

Data, including those of a sensitive nature, may be processed with regard to the need to establish, exercise or defend legal claims., should it be necessary, based on the evidence during the preliminary investigation (art 9 (2) (f) of the GDPR), to perform the obligations and specific rights of the Data Controller or Data Subject with regard to employment rights and social security and protection (Art. 9 (2) (b) GDPR).

The data may be processed on the basis of the legitimate interest of the Data Controller for the purpose of protecting the company's assets, in connection with the evidence contained in the report (Art. 9 (2) (f) GDPR).

Data may also be processed for purposes relating to further legal obligations to which our organisation may be subject, namely:

- to fulfil general obligations laid down by law, regulations, EU legislation, or orders issued by the authorities and other competent institutions
- comply with requests from the competent administrative or judicial authorities and, more generally, from public bodies in compliance with legal formalities

PROCESSING METHODS

How are data processed?

Reports are received exclusively by the dedicated functions, which handle them according to a pre-established procedure.

Data are processed using procedures and tools, including computer means, suitable for guaranteeing their integrity and availability, as well as the confidentiality of the identity of the person mentioned in the report, as well as the content of the report and relevant documentation.

An exception to this duty of confidentiality of the persons involved or mentioned in the report is the case where reports are made to judicial authorities.

Personal data are processed exclusively by authorised and instructed personnel who are competent to receive or follow up reports, who are bound to confidentiality, and who are allowed access to personal data to the extent and within the limits necessary for the performance of processing activities.

AUTOMATED DECISION-MAKING AND PROFILING

No automated decision-making, including profiling, as referred to in Article 22(1) and (4) of the GDPR is used in the processing of personal data.

DURATION OF PROCESSING

How long are data retained?

Reports and related documentation are retained for as long as necessary for the processing of the report and, where appropriate, for the adoption of the ensuing disciplinary measures and/or the exhaustion of any litigation initiated as a result of the report.

Data will not be retained beyond five years from the date of the communication of the final outcome of the reporting procedure.

Subsequently, this data may be processed anonymously for statistical or historical purposes.

DATA BREACH MANAGEMENT

Data will be retained as from the detection of the dangerous event or data breach, for the time necessary to notify the Authority of the data breach detected and to take the relevant remedial and security measures.

DATA RECIPIENTS

To whom are the data disclosed?

SCOPE OF KNOWLEDGE WITHIN THE ORGANISATION

The autonomous functions dedicated to the management of reports and the possible preliminary investigation for subsequent proceedings become aware of the personal data.

If, at the end of the verification, no elements of manifest groundlessness are found in the reported fact, the function will forward the result of the process for further investigation or for the adoption of measures within its competence:

- to the Head of Human Resources as well as to the Head of the organisational unit to which the infringer belongs, in order that disciplinary action may be taken, if the conditions are met;
- to the competent organisational bodies and structures to take any further measures and/or actions deemed necessary, also to safeguard the organisation itself;

EXTERNAL COMMUNICATION OF DATA

Personal data is disclosed for the purpose of carrying out activities related to the handling of the report, as well as to comply with certain legal obligations. In particular, communication may be made to:

- public or private parties in the event of breaches of the applicable regulations or who have access to them by virtue of provisions of the law, regulations or Community legislation, within the limits provided for by these rules (Institutions, Public Authorities, Judicial Authorities, Police Bodies)

- consultants and professionals (e.g. law firms) who may be involved in the investigation phase of the report, to the extent necessary to perform their duties in our organisation, subject to their appointment as data processors, which requires compliance with confidentiality and security instructions and duties in order to ensure confidentiality and data protection.
- service providers, including providers of the service for the provision and operational management of the technological platform for whistleblowing reports, instrumental to the pursuit of the purposes of handling reports, subject to their appointment as data processors

A list of data processors is available from the Data Controller.

Communication of your personal data is limited exclusively to the data necessary to achieve the specific purposes for which they are intended.

Personal data will not be circulated (e.g. by publication).

TRANSFER OF PERSONAL DATA OUTSIDE THE EU

Your personal data will not be transferred to third parties outside the European Union.

DATA SUBJECT'S RIGHTS

The exercise of the rights set out in Articles 15 to 22 of the GDPR (access, rectification, erasure, restriction of processing, objection to processing, portability) are not precluded to the data subject in absolute terms but may not be exercised, including in relation to the knowledge of the origin of the data, if the exercise of the rights may adversely affect the protection of the confidentiality of the identity of the reporting person or of the person mentioned in the report.

The exercise of the rights may be delayed, limited or excluded by reasoned communication made to the data subject without delay, unless said communication could jeopardise the purpose of the limitation, for such time and to the extent that this constitutes a necessary and proportionate measure aimed at safeguarding the confidentiality of the reporting person's identity as well as other interests, such as the conduct of the defensive investigations or the exercise of the right of defence.

In this case, rights may be exercised through the Personal Data Protection Authority (in the manner set out in Article 160 of the Privacy Code). In this case, the Data Protection Authority shall inform the person concerned that it has performed all the necessary verifications or that it has conducted a review, as well as of the right of the person concerned to appeal.

To exercise these rights, the interested party may contact the Data Controller, L.M. dei F.lli Monticelli S.p.A., whose contact details are indicated at the beginning of this information notice, with an informal request, who will do so without delay.

UPDATES

L.M. dei F.lli Monticelli S.p.A. updates the internal policies and practices adopted in the protection of personal data whenever necessary and in the event of regulatory and organisational changes affecting the processing of personal data.

Any updates to this notice will be made available in a timely manner and by appropriate means.

Last updated 22/07/2025