

# GEOVITA FUNCTIONAL INGREDIENTS SRL

CORSO BAROLO, 47  
12051 ALBA (CN)  
VAT 03060290040

## Information on the processing of personal data according to art. 13-14 Reg.to EU 2016/679

### Interested parties: whistleblower.

GEOVITA FUNCTIONAL INGREDIENTS SRL, in its capacity as Data Controller of your personal data, according to and for the purposes of EU Reg.to 2016/679 (hereinafter referred to as the 'GDPR'), hereby informs you that the legislation as mentioned above provides for the protection of data subjects with regard to the processing of personal data and that such processing will be based on the principles of fairness, lawfulness, transparency and protection of your privacy and your rights.

Your personal data will be processed under the legislative provisions of the legislation as mentioned earlier and the confidentiality obligations provided for therein.

In addition, the Data Controller may become aware of special categories of personal data and in detail: Common data and any special data processed in the context of the management of whistleblowing reports. The processing of personal data for these special categories complies with Article 9 of the GDPR.

Purpose and legal basis of the processing: in particular, your data will be processed for the following purposes related to the implementation of obligations relating to legislative or contractual obligations:

- Compliance activities in the context of Legislative Decree 24/2023.

Your data will also be processed for the following purposes related to the implementation of obligations relating to legislative obligations:

- Receipt, analysis and management of the report, as well as for the ascertainment of the facts covered by the same and adoption of the consequent measures, in compliance with the provisions of Legislative Decree no. 24 of 10 March 2023

Your personal data may also, subject to your consent, be used for the following purposes:

- disclosure of his/her identity to persons other than those competent to receive or follow up on the reports (paragraph 2 of Article 12 of Legislative Decree 24/2023) or in the context of the proceedings, where the dispute is based, in whole or in part, on the report and knowledge of his/her identity is essential for the defence of the accused (paragraph 5 of Article 12 of Legislative Decree 24/2023)

The provision of data is optional for you with regard to the purposes as mentioned earlier, and any refusal to process it does not compromise the continuation of the relationship or the adequacy of the processing itself.

Processing methods. Your personal data may be processed in the following ways:

- by means of electronic computers with the use of software systems managed by third
- parties, processing by means of electronic computers,
- Treatment in oral form;
- temporary processing in anonymous/anonymised form if chosen by the whistleblower

All processing takes place in compliance with the methods set out in art. 6, 32 of the GDPR and through the adoption of the appropriate security measures provided.

Your data will only be processed by personnel expressly authorised by the Data Controller and, in particular, by the following categories of authorised personnel:

- Reports manager, i.e. the person(s) responsible for receiving and managing reports, appointed in accordance with art. 4 co 2 of Legislative Decree 24/2023;
- Internal investigation bodies.

Communication: your data may be communicated to external parties for the correct management of the relationship and in particular to the following categories of Recipients including all duly appointed Data Processors:

- Court;
- Communication to bodies required by law relating to whistleblowing legislation according to Legislative Decree 24/2023, Bodies in charge of investigations,
- Digital platform for the management of whistleblowing Wallbreakers as Data Processor pursuant to Article 28 of the GDPR

Dissemination: Your personal data will not be disseminated in any way.

Retention Period. We would like to point out that, in compliance with the principles of lawfulness, purpose limitation and data minimisation, pursuant to art. 5 of the GDPR, the retention period of your personal data is:

- The data may be stored for up to 5 years from the date of communication of the final outcome of the reporting procedure (art. 14 of Legislative Decree 24/2023);
- established for a period of time not exceeding the achievement of the purposes for which they are collected and processed and in compliance with the mandatory times prescribed by law;
- established in a period of time not exceeding the fulfilment of legal obligations and for protection in litigation

Data Controller: the Data Controller, pursuant to the Law, is GEOVITA FUNCTIONAL INGREDIENTS SRL (CORSO BAROLO, 47 , 12051 ALBA (CN), P. IVA 03060290040).

You have the right to obtain from the data controller the erasure (right to be forgotten), the limitation, the updating, the rectification, the portability, the opposition to the processing of personal data concerning you, as well as in general you can exercise all the rights provided for by art. 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

### Reg.to EU 2016/679: Art. 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation of the existence or otherwise of personal data concerning him/her, even if not yet recorded, their communication in intelligible form and the possibility of making a complaint to the Supervisory Authority.

2. The interested party has the right to obtain information:

- a. the origin of the personal data;
- b. the purposes and methods of processing;
- c. the logic applied in the case of processing carried out with the aid of electronic tools;
- d. the identification details of the data controller, the data processors and the representative designated pursuant to Article 5, paragraph 2;
- e. of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representatives in the territory of the State, data processors or persons in charge

3. The data subject has the right to obtain:

- a. updating, rectification or, when interested, integration of data;
- b. the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed;
- c. certification that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfilment proves impossible or involves the use of means manifestly disproportionate to the protected right;
- d. data portability.

4. The data subject has the right to object, in whole or in part:

- a. for legitimate reasons to the processing of personal data concerning him, her, even if pertinent to the purpose of the collection,
- b. to the processing of personal data concerning him, her for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication