

ESG	Privacy Policy	
REV Nr. 0		

# Privacy Policy

**ITELYUM**  
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<u>REV. N°</u>	<u>DATE</u>	<u>DRAFTED BY</u>	<u>VERIFIED BY</u>	<u>APPROVED BY</u>
0	30/01/2026	<b>Group Compliance Manager</b> V. Minnucci _____	<b>DPO</b> _____	<b>Group Corporate Services Director</b> S. Cavacini _____ <b>CEO</b> M. Codognola _____

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**SUMMARY INFORMATION ON EXTERNAL WHISTLEBLOWING –  
ART. 13 OF EU REGULATION NO. 2016/679**

*Dear User,*

the EU Directive nr. 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law and laying down provisions was enacted on October 23, 2019.

Itelyum, in order to comply with this regulation, hereby **informs you about methods and purposes of use and processing of personal data** in the context of these kinds of reports, for which the Company guarantees confidentiality, anonymity and privacy.

Methods and purposes adopted are also in compliance with the national guidelines issued by ANAC (Italian anti-corruption Authority).

We invite you to read this policy carefully, noting that the term “personal data”, in compliance with EU Regulation 679/2016, refers to all information relating to an individual that is collected and/or processed for the purposes of protecting company assets and information, as well as for your confidentiality. This Policy is available online and can be consulted at any time in the section of the company website dedicated to *whistleblowing*.

**1. Data and purposes of processing:** the data collected and processed may include: common personal data, specific data where applicable, *IP addresses, logs* and images. These are collected for the following specific purposes, which constitute the reason for processing: **activities subject to legal obligations regarding whistleblowing**. The Data Controller informs you that your personal data is collected and processed using IT and similar tools exclusively in relation to EU Directive nr. 2019/1937 regulatory requirements and obligations, particularly, for the purposes of verifying the data transmitted and the information communicated when reporting any illegal activity of which you have become aware, as well as any documents, as permitted by law.

**2. Mandatory provision of data:** the acquisition of personal data is optional and not mandatory; reports to the Company may be anonymous.

**3. Processing methods - right to explanation and right to readability:** Data are

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processed using electronic tools, computer systems and devices protected with adequate and appropriate security measures in compliance with GDPR (Article 32) and, in some cases, by tracking the data.

We also want to inform you about the right you have to know the technology used for data processing, so the methods and details are indicated below, along with all the additional information required by current regulations, the adoption of an **internal reporting** system for reports of corporate wrongdoing by employees, colleagues or external third parties, i.e. **whistleblowing**.

In order to comply with these regulations, Itelyum has set up a web-accessible platform that allows reports to be sent while ensuring the protection of personal data of the reporter, who cannot be identified except in cases permitted by the regulations and/or when the whistleblower requests or approves the disclosure..

The chosen platform has been appropriately examined (DPIA) to assess its impact on the processing of personal data contained in the report, which may be sent *by filling in the form*<sup>1</sup> indicated in the same platform or by voice message; in both cases, the pseudonymisation of the data processed is guaranteed, as it will not be possible to trace the identity of the reporter for either method chosen, except upon a justified request permitted by the regulations.

**4. Storage period** - The data processed are stored in accordance with current legal obligations and retained for the duration of the investigation following the report.

**5. Communication of data** - The data collected, whether identifying or anonymised and processed, may be communicated and/or will potentially be accessible to:

- Persons appointed by the Data Controller and/or responsible;
- Subjects authorised to process data for the purposes set out in this policy, such as law enforcement agencies;
- Third parties, natural or legal persons, only if functional to the fulfilment of legal obligations;

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<sup>1</sup> In computer science, it is the interface of a programme that allows a user of a web platform or app to enter and send one or more pieces of data. It is a form found on web platforms and applications that allows users to send data by typing it into predefined fields. It is exactly the same as a form to be filled in, in digital format.

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- Providers of software services for the management of the elements platform, for maintenance, control or verification of the tools used for processing;
- Consultants or suppliers of the Data Controller (as external Data Processors) for aspects within their competence (of an administrative, accounting or legal nature) and in accordance with the procedures laid down by law;

In all the cases indicated, the communication of data is necessary for the purposes of managing the existing relationship, as well as for the performance of the services requested.

**6. Rights as a Data Subject** - We inform you that, as a Data Subject, you have all the rights provided for in Regulation No. 2016/679: Art. 15 (Right of Access), Art. 16 (Right to Rectification), Art. 17 (Right to Erasure), Art. 18 (Right to Restriction of Processing), Art. 20 (Right to Data Portability), Art. 21 (Right to Object). You also have the right to withdraw your consent to the processing of your data at any time. The withdrawal takes effect from the moment Itelyum becomes aware of it and does not affect the lawfulness of the processing based on the consent previously given. Finally, you have the right to lodge a complaint with a supervisory authority. For your information, all rights are specified in more detail at the following URL:

<https://gdpr-info.eu/>

**7. Identification of the Data Controller – the Company that has an interest in the report, which can be contacted for any communication or request in this regard,** (ref. Article 24 of EU Regulation 2016/679).

**8. Identification of the Data Protection Officer (DPO)**

The Company has identified and appointed the DPO, who can be contacted at [dpo@itelyum.com](mailto:dpo@itelyum.com).

**9. Intention to transfer data to a third country or international organisation**

Any data communication will be national, unless management requires data to be transferred abroad, in which case this will be done in full compliance with the measures established by current legislation.

*Last updated January 2026*

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