



INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA

pursuant to articles 13 and 14 of Regulation (EU) 2016/679 and
Legislative Decree 101/2018, and pursuant to art.13, paragraph 4 of Legislative Decree 24/2023
IN RELATION TO THE REPORTS OF "WHISTLEBLOWING"

Dear Interested,

with this information **Liguori Pastificio dal 1820 S.p.A.** explains how it processes the data collected and what rights are recognized to the interested party pursuant to Regulation (EU) 2016/679, as amended by Legislative Decree 101/2018, in relation to "Whistleblowing" reports, pursuant to Legislative Decree 10 March 2023, n.24, implementing Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019, concerning the protection of persons who report violations of Union law and containing provisions regarding the protection of people who report violations of national regulatory provisions. (GU n.63 of 15-3-2023).

1. Data controller

The data controller of personal data is Liguori Pastificio dal 1820 S.p.A., with headquarters in Via dei Pastai, 50 – 80054 Gragnano (NA).

E-mail: privacy@pastaligouri.com

2. Purpose of the processing

The data directly provided by you to report, in the interest of the integrity of the Organization, alleged illicit conduct of which you have become aware due to your employment, service or supply relationship with Liguori Pastificio dal 1820 S.p.A., will be processed by the Company itself to handle such situations. The personal data are therefore acquired as they are contained in the report and/or in deeds and documents attached to it, refer to the reporting subject and may also refer to people indicated as possible responsible for the illicit conduct, as well as to those in various capacities involved in the events reported. In particular, to carry out the necessary investigative activities aimed at verifying the validity of what has been reported, as well as, if necessary, adopting adequate corrective measures and undertaking appropriate disciplinary and/or judicial actions against those responsible for the illicit conduct.

3. Type of data processed

The receipt and management of reports gives rise to processing of personal data known as "common" (name, surname, job role, etc.), as well as may give rise, depending on the content of the reports and the deeds and documents attached to them, to the processing of so-called personal data. "particulars" (data relating to health conditions, sexual orientation or trade union membership, referred to in Article 9 GDPR) and personal data relating to criminal convictions and crimes (referred to in Article 10 GDPR).

4. Legal bases of processing

Taking into account the relevant legislation and, in particular, the articles. 12, 13 and 14 Legislative Decree. 24/2023, it is specified that:

- the processing of "common" data is based on the legal obligation to which the Data Controller is subject (art. 6, par. 1, letter c) of the GDPR);

- the processing of "special" data is based on the fulfillment of obligations and the exercise of specific rights of the Data Controller and the Interested Party in matters of labor law (art. 9, par. 2, letter b), GDPR);
- the processing of data relating to criminal convictions and crimes, taking into account the provisions of the art. 10 GDPR, is based on the legal obligation to which the Data Controller is subject (art. 6, par. 1, letter c), GDPR).

It is specified that, in accordance with the provisions of the art. 12 Legislative Decree. 24/2023, in the event that the report leads to the establishment of disciplinary proceedings against the person responsible for the illicit conduct, the identity of the reporter will never be revealed. If knowledge of the identity of the whistleblower is indispensable for the defense of the accused, the whistleblower will be asked whether he intends to give specific, free consent for the purposes of revealing his identity.

5. Subjects authorized to process the data

For your protection, only the Whistleblowing Team, within Liguori Pastificio dal 1820 S.p.A., is able to associate the reports with the identities of the whistleblowers. If investigative needs require that other subjects within the Company must be made aware of the content of the report or the documentation attached to it, the identity of the person making the report will never be revealed, nor will elements be revealed that could, even indirectly, allow its identification. These subjects, since they could still become aware of other personal data, are in any case all formally authorized to process and are specifically instructed and trained for this, as well as required to maintain secrecy regarding what they have learned as a result of their duties, without prejudice to the reporting and of complaint referred to in the art. 331 of the Criminal Procedure Code.

6. Data Controller

Liguori Pastificio dal 1820 S.p.A. uses a supplier, as a technological partner, to whom the management of the information system of the website is entrusted, designated for this Data Processor pursuant to art. 28 of Regulation (EU) 2016/679.

7. Categories of recipients of personal data

Your personal data and that of the people indicated as possible responsible for the illicit conduct, as well as of the people involved in various capacities in the reported events, will not be disclosed, however, if necessary, upon their request, they can be transmitted to the Judicial Authority, to the Court of Auditors and to the ANAC, National Anti-Corruption Authority. These subjects are all independent data controllers.

The report and the identity of the person making the report cannot be accessed either through documentary access or through generalized civic access.

In the context of any criminal proceedings initiated, the identity of the whistleblower will be covered by secrecy in the manner and within the limits established by the art. 329 c.p.p.; in the context of proceedings before the Court of Auditors, the identity of the reporter will not be revealed until the conclusion of the investigation phase; in the context of disciplinary proceedings, the identity of the whistleblower will not be revealed in all cases in which the contestation of the disciplinary charge is

based on investigations that are distinct and additional to the report, even if consequent to it, while it may be revealed where they contribute together, three assumptions, namely:

- a) a) that the dispute is based, in whole or in part, on the report;
- b) b) that knowledge of the identity of the whistleblower is essential for the defense of the accused;
- c) c) the reporting party has expressed specific consent to the disclosure of his/her identity.

8. Treatment methods

Personal data will also be processed with automated tools for the time strictly necessary to achieve the purposes for which they were collected, via the dedicated page on the company website. Liguori Pastificio dal 1820 S.p.A. implements appropriate measures to ensure that the data provided are processed adequately and in accordance with the purposes for which they are managed; the Company. employs suitable organizational, technical and physical security measures (file encryption) to protect the information from alteration, destruction, loss, theft or improper or illegitimate use, pursuant to art. 13, paragraph 6 of Legislative Decree 24/2023.

9. Data retention

The Whistleblowing Manager carries out a preliminary investigation of the report. If, following the activity carried out, he discovers elements that are manifestly unfounded, he will arrange for them to be archived. However, if the RWB deems the report to be unfounded, it transmits it, without the reporting person's data, to the internal or external bodies in charge, each according to their own competences. Personal data are kept for a period of 5 years and, in any case, until the proceedings initiated by the offices or bodies receiving the report are defined, pursuant to art. 14, paragraph 1 of Legislative Decree 24/2023.

10. Nature of the provision of data and consequences of any failure to provide it

In order to classify the report as whistleblowing, your identification data (name, surname) must be provided. In the event that the reporting party still wishes to proceed with anonymous reporting, the latter must necessarily indicate, in the selection box called "The reported party is a", the item "remain anonymous"; this report will be taken into consideration only where adequately detailed, provided in great detail and therefore capable of bringing out facts and situations by relating them to specific contexts. However, the decision regarding which further personal data to provide is left to each reporting party. The more details present in the report, the greater the possibilities for Liguori Pastificio dal 1820 S.p.A. to intervene in the interests of the integrity of the Organization.

11. Rights

You have the right, at any time, to obtain confirmation of the existence or otherwise of the data provided. You also have the right to request, in the forms provided for by law, the rectification of inaccurate personal data and the integration of incomplete data and to exercise any other right pursuant to articles 18 to 22 of the Regulation where applicable. We inform you that the reports, and the attachments to the report, are excluded from the right of access and generalized civic access.

If you have given consent to the disclosure of your identity in the context of disciplinary proceedings, you have the right to revoke this consent at any time, without however prejudice to the lawfulness of the processing, based on consent, carried out before the revocation.

These rights can be exercised with a request addressed to:

- Liguori Pastificio dal 1820 S.p.A., Via dei Pastai, 50 – 80054 Gragnano (NA)
- e-mail address: privacy@pastaliguori.com

If you believe that the processing has taken place in a manner that does not comply with the Regulation and Legislative Decree 196/2003, as amended by Legislative Decree 101/2018, you may contact the Guarantor for the Protection of Personal Data, pursuant to the art. 77 of the same Regulation.

Further information regarding your rights on the protection of personal data can be found on the website of the Guarantor for the Protection of Personal Data at www.garanteprivacy.it.

Gragnano (NA), 15.12.2023