

PERSONAL DATA PROCESSING POLICY IN ACCORDANCE WITH ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 IN RELATION TO WHISTLEBLOWING

This policy is provided by GREEN OLEO S.p.A. Benefit Corporation with respect to the processing of personal data carried out by it through the specific channel for reporting breaches of national law and EU law that are harmful to the public interest or the integrity of GREEN OLEO S.p.A. Benefit Corporation ('Whistleblowing'). If the report is made by an employee or collaborator of the Company, this policy supplements and does not replace the policy provided to the latter's personnel for the management of their work relationship.

1. Data Controller

GREEN OLEO S.p.A. Benefit Corporation, with registered office in Cremona, Via Bergamo 66, Italy (the '**Controller**'), protects the confidentiality of your personal data and makes sure they are protected against any event that might expose them to the risk of a data breach.

To this end, the Controller takes appropriate technical and organisational measures concerning the collection, use of personal data and the exercise of your rights under the applicable legislation. Consequently, the Controller takes care to update the regulations and procedures adopted for the protection of personal data whenever necessary and otherwise in case of regulatory and organisational changes that may affect the processing of your personal data.

2. Data Protection Officer

GREEN OLEO S.p.A. Benefit Corporation has not appointed a Data Protection Officer (DPO), though has a Privacy Contact Person who may be contacted at the following e-mail address: privacy@greenoleo.com

3. Purposes of data processing

The data directly provided by you to report, in the public interest or for the integrity of GREEN OLEO S.p.A. Benefit Corporation, alleged unlawful conduct of which you become aware by reason of your employment, service or supply/consultancy relationship with the Controller, in accordance with the Whistleblowing Procedure adopted by the Data Controller to which you are referred, will be processed by the Controller to handle such situations. Personal data are therefore acquired insofar as they are contained in your report and/or in deeds and documents annexed thereto; they refer to the reporting person and may also refer to persons indicated as possibly responsible for the unlawful conduct, as well as to the persons concerned.

In particular, data are processed to carry out the necessary investigations aimed at verifying the soundness of the report, as well as, if necessary, at taking suitable corrective measures as well as appropriate disciplinary and/or judicial actions against those responsible for the unlawful conduct.

4. Types of data processed

The receipt and handling of reports entails the processing of both 'common' personal data (name, surname, role or position at work, etc.) and, depending on the content of the reports and the deeds and documents annexed to them, of 'special' personal data (data concerning health, sexual orientation or trade union membership, as referred to in Article 9 GDPR) as well as of personal data concerning criminal convictions and offences (as referred to in Article 10 GDPR).

5. Legal basis of data processing

The Controller processes data to meet the following need:

- **compliance with legal obligations:** Whistleblowing procedure management in accordance with Italian Legislative Decree No. 24 of 10 March 2023, on '*Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and provisions concerning the protection of persons who report breaches of national law*'.

6. Data provision and consequences of non-provision

To classify a report as whistleblowing, the reporting person's identifying data (name, surname) are required. Should the reporting person nevertheless wish to make an anonymous report, the latter shall only be handled where it is adequately substantiated, detailed and based on precise and consistent facts (and not on generic or confused content), so as to allow for its assessment and appropriate investigation (e.g. the report refers to specific corporate areas, procedures or events, etc.).

7. Persons authorised to process data

Only the following persons are authorised to process data:

- **Atty. Luisa Sangiovanni (luisa.sangiovanni@legal-ita.eu)**

As provided for in the Whistleblowing Procedure, reports will be handled jointly; these persons will be the only ones who

can associate reports with the corresponding reporting persons.

Should the investigation require that other persons, either within the Controller or external to it (e.g. external consultants who may be involved in investigating the report; corporate functions involved in receiving, examining and assessing reports), be made aware of the content of the report or of the documentation attached thereto, the identity of the reporting person will never be disclosed, nor will information be revealed which may, even indirectly, allow for the latter's identification. If, for investigative purposes, your identity needs to be revealed to parties other than the manager of the reporting channel, your consent will be expressly requested.

8. Categories of recipients of personal data

Your personal data and those of the persons indicated as possibly responsible for the unlawful conduct, as well as of the persons concerned, will not be disseminated; however, if necessary, at their request, they may be provided to the Judicial Authority and to ANAC, the National Anti-Corruption Authority. These persons are all independent data controllers.

The identity of the reporting person in the course of any criminal proceedings will be kept confidential in the manner and within the limits provided for in Article 329 of the Italian Code of Criminal Procedure; the identity of the reporting person in the course of any disciplinary proceedings will not be revealed whenever the allegation of the disciplinary offence is based on investigations that are separate and additional to the report, even if consequent to it, whereas it may be revealed if the following three conditions are met: (a) the allegation is based, in whole or in part, on the report, (b) knowledge of the reporting person's identity is essential for the accused's defence, and (c) the reporting person has given specific consent to the disclosure of his or her identity.

9. Processing methods

Personal data are processed by automated means for the time strictly necessary to achieve the purposes for which they were collected. The Controller takes appropriate measures to ensure that the data provided are processed appropriately and in accordance with the purposes for which they are managed; the Controller takes appropriate security, organisational, technical and physical measures to protect information from alteration, destruction, loss, theft or improper or illegitimate use.

10. Period of data storage

The manager of the channel receiving the report carries out a preliminary investigation thereof. If, as a result of such activities, the report is found to be groundless, it is dismissed. If, on the other hand, the report is well-founded, it is forwarded, without the reporting person's data, to the competent internal or external bodies.

Personal data are stored for five years and otherwise until the procedures initiated by the offices or bodies to which the report is addressed are closed.

11. Rights

You have the right, at any time, to obtain confirmation of the existence or non-existence 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 under Articles 18 to 22 of the Regulation where applicable.

If you have consented to the disclosure of your identity in disciplinary proceedings, you have the right to withdraw your consent at any time without this affecting the lawfulness of processing based on consent before its withdrawal.

These rights may be exercised by sending a request to the Controller: GREEN OLEO S.p.A. Benefit Corporation - email address: privacy@greenoleo.com

If you believe that processing has not been carried out in accordance with the Regulation and Italian Legislative Decree 196/2003, you may lodge a complaint with the Data Protection Authority, pursuant to Article 77 of the same Regulation. Further information on your data protection rights can be found on the website of the Data Protection Authority at www.garanteprivacy.it.

Pursuant to Article 2-undecies of the Privacy Code (implementing Article 23 of the GDPR), the above-mentioned rights may not be exercised by data subjects (by sending a request to the Controller or by lodging a complaint pursuant to Article 77 of the GDPR) if the exercise of such rights may actually and concretely prejudice the confidentiality of the reporting person.