

# Data Protection Policy

## Privacy Policy

All companies belonging to the TPS Group, and the Supervisory Body [*Organismo di Vigilanza*] (O.d.V.) appointed to manage reports take data protection and confidentiality into serious consideration, applying the provisions of the Data Protection Regulation of the EU ("GDPR") and the relevant national regulations concerning data protection.

Please read this privacy policy with care before sending in a report.

## Purpose of reports and legal basis

The reporting system serves to receive, process, and manage information on potential breaches of the law, according to that established by EU Dir. 2019/1937 and Lgs. Decree no. 24/2023, of T.P.S. S.p.A. and all companies belonging to the TPS Group, safely and confidentially.

The processing of personal data within the system is based on the lawful interest of the TPS Group to identify and prevent offences and therefore, to prevent damage to the TPS Group and the employees and customers of same. The legal basis for the processing of personal data is Article 6, subsection 1f) of the GDPR.

## Responsible entity

The responsible entity with regard to data protection within the reporting system is the O.d.V. in office, as appointed to manage the reports. All data are managed to that access is limited to the lowest possible number of addressees, expressly authorised by the O.d.V. as part of the enquiries concerning the individual reports.

## Type of personal data processed:

The use of the reporting system is voluntary, as is the communication of the whistleblower's data. When a report is explicitly made, the O.d.V. collects the following personal data and information:

- name and family name,
- if the whistleblower is an employee of the TPS Group
- if applicable, the name and other personal details of the person/s named in the report.

## **Confidential processing of reports**

Incoming information received by the the O.d.V. and, if necessary, in case of investigation, by a close circle of subjects expressly authorised and specifically trained. Information is always treated in confidence.

The O.d.V. will check the plausibility of the facts and if necessary, ask for further clarification. During the processing of a report or during an enquiry, it may be necessary to make information available to other employees of T.P.S. S.p.A. or other companies in the Group if, for example, the information refers to events involving subsidiary companies. Anyone with access to data shall observe confidentiality.

## **Data subject's information**

The O.d.V. is generally required to inform accused persons of receipt of a report about them as soon as this information is no longer a risk to the whistleblower.

The whistleblower's identity will not be disclosed during this procedure, always and in any case to the extent envisaged and permitted by law.

## **Data subject's rights**

According to European data protection laws, the data subject's rights to information, correction, deletion, and limitation are guaranteed, as is the right to oppose processing of personal data.

In case of use of the right to oppose processing, the O.d.V. will immediately check the extent to which the data stored are still necessary for the preparation of notification. Data that are no longer necessary will be deleted immediately.

Gallarate, 15/07/2023