

Information Notice pursuant to arts. 13 and 14 of Regulation (EU) 2016/679 GDPR (General Data Protection Regulation) and Data Subjects specified in Art. 5, clause 1, let. A) and B) of D.Lgs. 231/2001

Dear "Data Subject", we wish to inform you that "European Regulation 2016/679 of April 27 2016 concerning the protection of individuals with regard to the processing of personal data, as well as the free circulation of such data" (henceforth "GDPR") provides for the protection of individuals regarding the processing of personal data.

DATA CONTROLLER

The Parent Company **SACBO SpA** and the Subsidiary Company **BGY International Services Srl**, each for its own competence, represent the "Data Controller" for the processing of your personal data, and, under art. 13 of the GDPR, the Companies inform you they will process the personal data provided in the following ways:

The data provided by you, including those reported in the disclosures, shall be processed according to the principles of accuracy, honesty, transparency and protection of privacy and rights, relating to you and all other data subjects, in compliance with the confidentiality obligations imposed by the privacy legislation and the Whistleblowing law.

PROCESSED DATA

SACBO SpA and **BGY International Services Srl** only collects your identifying data and those indicated in the disclosures. Among the data you have voluntarily provided, the following personal data may be acquired: name, email address, identification document, message contents.

PURPOSE AND LEGAL BASIS OF THE PROCESSING

The data you provide shall be processed, pursuant to the obligations of the Whistleblowing Law 179/2017, amending art. 6 of Legislative Decree 231/01, therefore, includes, among the requirements of the Organisational and Management Model 231, the putting in place of one or more whistleblowing speak up channels that may be used to protect the integrity of the Companies, with circumstantial disclosures of possible illegal misconduct, pursuant to Decree 231 or possible breaches of the Organisational and management model, based on precise and concordant wrongdoings.

HOW WE USE YOUR PERSONAL DATA AND WHICH CONDITION MAKES THE PROCESSING LAWFUL	FOR HOW LONG WE KEEP YOUR PERSONAL DATA
<p>Purposes related to the application of the whistleblowing procedure, relating to the reporting of offenses and / or irregularities that you have come to know in the context of the duties performed, pursuant to Article 2 of the L. 30 November 2017, n . 179.</p> <p>In particular, your data will be collected and processed to manage the report and to guarantee your protection in the event of reporting of crimes or irregularities which you have become aware of in the context of your working relationship with the Data Controller. To this end, the condition that makes the processing of your data lawful is the legitimate interest of the data controller who, pursuant to art. 6, co.1, lett. f) of the GDPR, which, having become</p>	<p>For 5 years from the reporting of the fact or unlawful act.</p> <p>Duration of the dispute until completion of the terms of implementation outlined in legal remedies.</p>

<p>aware of the report submitted by you, intends to protect its integrity.</p>	
<p>Fulfillment of obligations or exercise of rights under national or EU law.</p>	<p>For 5 years from the reporting of the fact or unlawful act.</p>
<p>We process the data to fulfill legal obligations to which the owner is subject. See, in particular, the art. 6, co. 2bis and ss. of Legislative Decree 8 June 2001, n. 231.</p>	<p>Duration of the dispute until completion of the terms of implementation outlined in legal remedies.</p>
<p>To ascertain, exercise or defend the rights of the Data Controller during the out-of-court and / or judicial complaint and / or resolution, should it be necessary.</p> <p>If necessary, we process your data or, possibly, particular categories of data - respectively - for a legitimate interest or for the need to ascertain, exercise or defend a right in court.</p>	<p>For this purpose, Personal Data will be kept for the entire duration of the complaint and / or the out-of-court and / or judicial proceedings, until completion of the terms of implementation outlined in legal remedies.</p>

MANDATORY COLLECTION OF DATA AND CONSENT

Pursuant to art. 13, par. 2, lett. e) of the GDPR please be informed that, taking into account the purposes of the processing as illustrated above, the collection of your identifying data is mandatory and failure to provide them will make it impossible to create a recognizable “whistleblower”. It should be noted that the regulation requires that the whistleblower can be recognised in order to be able to make use of the protection scheme granted to the same.

As for the consent of the accused party or any subjects involved in the whistleblowing disclosure, the processing of personal data is permitted even without the consent of the data subject, as it is necessary for the Data Controller to pursue a legitimate interest, given the importance to the latter of the illegal conduct, prevailing over the interests and rights of the accused party in question.

METHODS OF DATA PROCESSING

The processing shall be carried out using manual, IT and telematic tools, as the paper report received by the Whistleblowing Committee will be promptly transferred to the IT platform, implemented as an alternative reporting channel to the paper one, with organisational and processing logics strictly related to the aforementioned purposes and, in any case, in order to guarantee the security, integrity and confidentiality of the data in compliance with the organisational, physical and logical measures envisaged by current provisions.

DATA RECIPIENTS

The data may be communicated to subjects operating as autonomous Data Controllers included, for example, in the following categories: Public Institutions and / or Authorities; Judicial authority; Police bodies.

The Data may also be processed, on behalf of the respective Data Controllers, by subjects designated as Data Processors, included, for example, in the following categories: companies that provide IT services; companies that provide software maintenance services that allow the sending of the report.

AUTHORISED DATA PROCESSORS

The data may be processed by the organisational roles of the company departments (for example legal, human resources, security) or external bodies (Ethics Committee, Supervisory Bodies) appointed to pursue the aforementioned purposes, which have been expressly authorised for processing.

RIGHTS OF THE WHISTLEBLOWER

You may exercise these rights at any moment in time:

- to access your personal data;
- to obtain rectification or erasure of the same;
- to obtain integration of incomplete data;
- to obtain restriction on the processing in the cases provided for by art.18 GDPR, and object to the processing for reasons related to one's particular situation, in the event of legitimate interest of the Data Controller.
- to withdraw consent, where foreseeable: the withdrawal of consent shall not affect the lawfulness of processing based on consent conferred before such withdrawal; withdrawing consent shall make it impossible to access your profile, although you may still view the disclosures using the assigned codes;
- to lodge a complaint with the supervisory authority (Data Protection Supervisor).

Withdrawal and erasure of data is not foreseen in the event that the processing is necessary for compliance with a legal obligation to which the controller is subject.

It is also specified that pursuant to article 2-undecies, paragraph 1, lett. f) of Legislative Decree 101/2018 (the law by which Legislative Decree 196/03 - Privacy Code - has been adapted to the GDPR), the Data Controller guarantees the confidentiality of your identity and the exercise of rights will be limited with reference to the subject indicated by you.

CONTACTS

SACBO SpA and BGY International Services Srl, Companies belonging to the same Group, having their registered offices in Via Orio al Serio 49/51, 24050 Grassobbio (BG) and reachable from the email address privacy@sacbo.it, having a distinct legal personality, constitute two separate Data Controllers with respect to the processing of personal data within their own competence.

The "Data Protection Officer" to whom you can apply to exercise the rights referred to in Art. 13 and/or for any further clarifications regarding the protection of personal data, is Partners4Innovation c/o SACBO SpA., and can be contacted at dpo@sacbo.it or dpo.bis@bgysis.it