INFORMATION ON THE PROCESSING OF PERSONAL DATA		
FOREWORD	The sending of a relevant report pursuant to Legislative Decree no. 24/2023 on the subject of Whistleblowing, through the channels provided by the Company, involves the subsequent acquisition of a series of information, contained in the report or in any attached documentation. This information, which is necessary for the management of the report, may include Personal Data, in some cases, also belonging to particular categories of Personal Data or Data relating to criminal convictions and offences. In accordance with the provisions of current legislation and the Organisation, Management and Control Model adopted by Con.Se. S.r.l., the Company undertakes to guarantee the confidentiality of the identity of the Whistleblower, including through disciplinary and contractual sanctions against those who violate the whistleblower's protection measures. It should also be noted that: - the law protects the Whistleblower from acts of retaliation and discrimination, direct and indirect, directly or indirectly linked to the report; - disciplinary sanctions may be applied to persons who make reports that prove to be unfounded with intent or gross negligence. As a guarantee for the Whistleblower, the Company has appointed the Whistleblowing Officer to manage the reports transmitted through the established channels.	
DATA CONTROLLER AND CONTACT DETAILS	**CON.SE. S.r.l.** privacy@conse.it Via Molino Rosso 9/C - 40026 Imola (BO) Italia	
DATA PROTECTION OFFICER AND CONTACT DETAILS	**SGS Italia S.p.A**. ssc@sgsitalia.postecert.it Via Caldera 21 - 20153 Milano (MI) Italia	
CATEGORIES AND TYPES OF DATA COLLECTED AND TREATIES	The Data processed by the Company They may include:	The receipt and management of reports may involve the processing of: ▪ **COMMON PERSONAL DATA** (e.g. name, surname, contact details, job role, etc.), ▪ **depending on the content of the report** and/or the **attached documents**, possibly **DATA belonging to SPECIAL CATEGORIES of Data** (e.g. Data relating to health conditions, sexual orientation or trade union membership, referred to in Article 9 of the GDPR) and**/or Data relating to criminal convictions and offences** (referred to in Article 10 of the GDPR). Each Whistleblower is responsible for deciding independently which Personal Data to communicate. The more details you provide with your report, the better your chances of correctly evaluating the content of your report.

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Scopri le altre sedi smeup

<table>
<tr>
<td rowspan="2">NATURE OF DATA PROVISION

LEGAL BASES OF PROCESSING

PURPOSE OF THE PROCESSING</td>
<td>BASED ON LEGAL OBLIGATIONS
(Artt. 6.1.c, 9.2.b e 10 del GDPR)

IN SOME CASES WITH PRIOR CONSENT
(Art. 6.1.a e 9.2.a del GDPR)

IN THE CONTEXT OF LEGITIMATE INTERESTS
(Art. 6.1.F del GDPR)</td>
<td>The legal basis for the processing is given by the need to comply with a legal obligation to which the data controller is subject pursuant to art. 6.1.c GDPR and possibly 9.2.b GDPR and 10 GDPR. The Personal Data communicated will in fact be used by Con.Se. S.r.l. to manage the report, in accordance with the provisions of current legislation.
In the following cases, the processing may only take place in the presence of a valid consent expressed by the whistleblower pursuant to art. 6.1.a GDPR and 9.2.a GDPR:
• if it is necessary to disclose the identity of the reporting person and any other information from which this identity may be inferred, directly or indirectly, to persons other than those competent to receive or follow up on the report (pursuant to Article 12 para. 2 of Legislative Decree 24/2023);
• in the event that knowledge of the identity of the reporting person is essential for the defence of the accused in the event of a disciplinary complaint based in whole or in part on the report (pursuant to Article 12 para. 5 d.ls. 24/2023);
• in the case of a report made by means of a registered telephone line or other recorded voice messaging system, to proceed to document the report, by recording on a device suitable for storage and listening or by full transcription (pursuant to Article 14 c. 2 of Legislative Decree 24/2023);
• in the case of a report made orally during a meeting with the staff in charge, to proceed to document the report, by recording on a device suitable for storage and listening or by means of a report (pursuant to Article 14 c. 4 of Legislative Decree 24/2023).
It should be noted that the Data provided, in particular cases, may also be processed for:
• to comply with additional obligations provided for by applicable laws (with respect to those provided for in the field of whistleblowing), regulations or EU legislation, or to comply with requests from the authorities. The legal basis of the processing is the obligation for the Data Controller to comply with the mandatory legislation pursuant to Article 6.1.c GDPR and 9.2.b GDPR;
• needs to defend the rights of the Data Controller in the context of any disputes, including in court. The legal basis of the processing is the legitimate interest of the Data Controller to protect its rights pursuant to Article 6.1.f GDPR.</td>
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<tr>
<td>WHO HAS ACCESS TO THE DATA AND WITH WHOM IT IS SHARED</td>
<td colspan="2">To protect the Whistleblower, only the Whistleblowing Officer is authorised to manage reports.
It is required to maintain the confidentiality of the identity of the Whistleblower.
It should be noted, however, that the processing of Data may in any case involve management by:
- subjects who typically act as data processors pursuant to art. 28 GDPR, as they cooperate with the Company for the pursuit of the purposes of the processing, duly bound to confidentiality;
- persons authorised by the Company, pursuant to art. 29 GDPR, to the processing of Data necessary to carry out activities strictly related to the provision of services, duly bound to confidentiality;
- - subjects, bodies or authorities to whom it is mandatory to communicate the Data by virtue of legal provisions or orders of the authorities.</td>
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INTERNATIONAL DATA TRANSFER 	No international transfers of Data are envisaged in the context of this processing. Based on the notification received, the need to transfer Data outside the EEA may arise. In such a case, any transfer of Data to countries outside the EEA will take place in accordance with one of the methods permitted by current legislation.	
HOW DATA IS PROTECTED 	The Company implements appropriate organizational and technical measures to protect the Data against unauthorized, accidental or unlawful acts of destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing. These security measures have been implemented considering the state of the art of the technology, their cost of implementation, the risks presented by the processing and the nature of the Data, with particular attention to sensitive data. In particular, adequate awareness, confidentiality and training efforts are in place to ensure that Data is not shared with or disclosed to unauthorized persons.	
HOW LONG THE DATA IS STORED 	The Data will be stored only for the **time necessary** to achieve the purposes of the processing, respecting the principles of **storage limitation** and **minimization** defined in Art. 5.1, letters c) and e) of the GDPR. It should be noted that: • as regards the Data processed to comply with legal obligations, they will be stored for the time provided for by the specific obligation or applicable law (for the management of the report, no longer than five years from the date of communication of the final outcome of the reporting procedure pursuant to Article 14 paragraph 1 of Legislative Decree 24/2023); • as regards the Data processed for the purposes of defending the rights of the Data Controller, no more than what is provided for and permitted by Italian law to protect its interests. When the aforementioned reasons for processing cease, the Data will be **anonymised, deleted or destroyed**.	
 **ARTIFICIAL INTELLIGENCE IN THE WORKPLACE** (Art. 11 della Legge 23 Settembre 2025, n. 132)	In accordance with current legislation, the Company uses artificial intelligence in the workplace to improve working conditions, protect the psychophysical integrity of workers, increase the quality of work performance and people's productivity. The use of artificial intelligence must be safe, reliable, transparent and may not be carried out in contrast with human dignity or violate the confidentiality of personal data. Artificial intelligence systems will not be used to provide relevant information for the purposes of hiring or assigning an assignment, managing or terminating the employment relationship, assigning tasks or tasks or assessing the fulfilment of workers' contractual obligations.	
RIGHTS OF THE DATA SUBJECTS 	Each Data Subject may exercise the following rights defined in Articles 15-22 GDPR by sending a written request to the Company at the aforementioned contact details.	▪ **Access**: the interested party can obtain information relating to the processing of his Data and a copy of the same. ▪ **Cancellation**: the data subject may request the deletion of his or her Data, within the limits permitted by law. ▪ **Opposition**: the interested party may object to the processing of the Data, for reasons related to his or her particular situation. ▪ **Rectification**: if the data subject considers that his or her Data is inaccurate or incomplete, he or she may request that the same be modified accordingly. ▪ **Restriction**: the data subject may request the restriction of the processing of his or her Data. ▪ **Data Portability**: the data subject may obtain a return of the Data or, where technically feasible, their transfer to a third party. ▪ **Lodge a complaint with the Supervisory Authority**: the data subject always has the right to lodge a complaint with the Data Protection Authority pursuant to Article 77 of the GDPR if he/she believes that the processing of his/her Data is contrary to current legislation.

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PRIVACY POLICY STATUS AND UPDATE	This Privacy Policy was updated in Imola on 2026/10/23. The Company reserves the right to amend it from time to time.

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