

Reporting data

First and Last Name _____

Job title

Phone Number _____

E-mail _____

CONDOTTA SEGNALATA

Date or period when the event occurred: gg/mm/aa _____

Physical location where the event occurred: (specify name and address)

Outside the office: (specify location and address). _____

believe that the actions or omissions committed or attempted are:

- criminally relevant;
- civil wrongs;
- administrative and/or accounting offenses;
- carried out in violation of provisions whose violations are punishable through disciplinary measures;
- capable of causing financial prejudice to PRIMOPIANO S.P.A.;
- capable of harming the image of PRIMOPIANO S.P.A.;
- capable of causing harm to the health or safety of employees, citizens, or users, or causing harm to the environment;
- capable of causing prejudice to employees, users, or other individuals carrying out their activities at PRIMOPIANO S.P.A.;
- other (specify) _____.

Description of the fact (conduct and event).:

Perpetrator(s) of the act.:

1 _____

2 _____

3 _____

Other possible individuals aware of the fact and/or able to report on it:

1 _____

2 _____

3 _____

Consent to the communication of one's name to the accused

Yes NO

Date and time _____ Signature _____


The report can be submitted in the following ways:

Methods of Reporting - Written Form

- By submitting a written report enclosed in three sealed envelopes: the first containing the identifying information of the reporter along with a photocopy of the identification document; the second containing the report, to separate the identifying information from the report itself. Both envelopes must then be placed in a third sealed envelope with the external label "confidential" for the attention of the report manager (e.g., "confidential to the REPORT MANAGER"). The report must be sent by registered mail with acknowledgment of receipt to Avv. Daniele Compagnone, Corso Italia 90/2, Gorizia. Upon receiving the communication, it will be subject to confidential filing, also through a separate registry, by the manager.

Methods of Reporting - Oral Form

- Through a request for a direct meeting, upon the reporter's request, with the Referee to be sent to the email address odv.dc@studiolegalemc.com;
- Through a request for a direct meeting, upon the reporter's request, using the telephone line 0481 34653.

 <p>PRIMOPIANOCUCINE® Kitchen by you.</p>	<p>WHISLTEBLOWING POLICY</p> <p>MODULO PER LA SEGNALAZIONE DI CONDOTTE ILLECITE O IRREGOLARITÀ</p>	<p>Pag. 3 di 3</p> <p>Edizione 1</p>
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By requesting a direct meeting, upon the reporter's request, by phone at 0481 34653.

INFORMATION ACCORDING TO ARTICLE 13 OF REGULATION (EU) 2016/679 ON THE PROCESSING OF PERSONAL DATA OF WHISTLEBLOWERS UNDER LEGISLATIVE DECREE 24/2023

PRIMOPIANO S.P.A. is committed to respecting your privacy and protecting your personal data, which can somehow lead to your identification. This personal data information letter contains information about the reasons and methods in which the company will process your personal data and what types of personal data will be collected.

The Data Controller for the processing of your personal data in relation to this consent is PRIMOPIANO S.P.A., whose contact details are:

Registered Office VIA PONTAROLA 1/A - 35011 - CAMPODARSEGO (PD)

PEC: primopianospa@legalmail.it

The personal data are processed by the Manager of internal reporting under Legislative Decree 24/2023 (whistleblowing) of PRIMOPIANO S.P.A. as an External Data Processor appointed in accordance with Article 28 of Regulation (EU) 2016/679 ("GDPR") in the performance of its tasks related to the verification of any reported offenses in the interest of the Company that may be reported by employees of PRIMOPIANO S.P.A. or third parties and falling within the regulatory provisions of Legislative Decree 24/2023.

1. LEGAL BASIS OF PROCESSING

The legal bases for processing are:

The legitimate interest of the Data Controller, under Article 6, paragraph 1, letter f) of the GDPR, which, upon learning of the report you submitted, intends to guarantee and preserve the integrity of the company's assets;

The need to fulfill a legal obligation to which the Data Controller is subject, with reference to the provisions of Law 179/2017 and Legislative Decree No. 24/2023;

The need for the Data Controller to ascertain, exercise, or defend a right in court, if necessary;

Your specific consent under Articles 6, paragraph 1, letter a), and Article 9, paragraph 2, letter a), of the GDPR.

Please note that the provision of personal data (personal and contact data) in reports under Legislative Decree 24/2023 is optional; however, the failure to provide personal data may affect the investigation of the report: anonymous reports, in fact, will be considered only if adequately substantiated and provided with details, in order to highlight facts and situations related to specific contexts.

2. TYPES OF PROCESSED DATA AND PURPOSES OF PROCESSING

The data provided by the reporter to represent the alleged unlawful conduct that he/she has become aware of due to his/her employment relationship with PRIMOPIANO S.P.A. are processed in order to carry out the necessary investigative activities to verify the validity of the reported fact and the adoption of the consequent measures.

3. DATA RECIPIENTS

Recipients of the data collected following the report, if applicable, are the Judicial Authority, ANAC, and the Manager of internal reporting as an External Data Processor.

4. PERIOD OF PERSONAL DATA STORAGE

The personal data collected is kept for a period not exceeding ten years from the date of receipt of the Report, as well as for the entire period necessary for the conduct of any proceedings resulting from the management of the report (disciplinary, criminal, accounting).

Storage may be extended beyond ten years in relation to requests from public authorities and the Data Protection Authority.

The retention of personal data, including special data, is also guaranteed for a longer period within the limits of the prescription period of rights, in relation to needs related to the exercise of the right of defense in the event of disputes.

5. RIGHTS OF THE DATA SUBJECTS

In accordance with Regulation (EU) 2016/679, you have certain rights in relation to the processing of your personal data, which are listed below.

Right of access to your personal data collected by the Company. You have the right to obtain a copy of your personal data collected by the Company and to verify the correctness of their processing.

Right to rectify, correct, and update your personal data collected by the Company. You have the right to correct any incomplete or inaccurate information about you collected by the Company.

Right to receive your personal data provided by you in a structured, commonly used, and machine-readable format (data portability) and the right to transmit this data to another data controller, as long as it is within the framework of the execution of an employment relationship.

Right to erasure of your personal data. You have the right to request the deletion or removal of your personal data if there is no longer a just cause for the processing of the same by the Company. You have the right to request the deletion of personal data if you have exercised your right to object to the processing.

Right to limit the processing of your personal data. You have the right to request the Company to suspend the processing of your data (for example, if you want to verify the correctness of the processing or the purposes of the processing).

Right to object to the processing of your personal data in certain circumstances. This right applies only if the processing of your data is based on a legitimate interest of the Company or in the case of profiling of your data.

Right to withdraw consent. If the processing of your personal data is based on your consent, you have the right to revoke your consent to the processing at any time.

Read, confirmed, and signed.

PLACE, DATE _____

MR. / MRS. _____