MEI S.r.l.

Via Ing. Caproni 50
24036 Ponte San Pietro (BG)
Tel: 035339112
P.IVA 02053210163
PEC: meisystem@pec.meisystem.com

Privacy Policy concerning the processing of personal data pursuant to articles 13-14 of (EU) Regulation 2016/679

Data subject: Whistleblower.

MEI S.r.l. in its capacity of Data Controller with regard to the processing of your personal data pursuant to (EU) Reg. 2016/679 (hereinafter the 'GDPR'), hereby informs you that the said regulation protects data subjects with regard to the processing of their personal data and that the said processing will take place in a fair, lawful, transparent manner which protects your privacy and your rights.

Your personal data will be processed in accordance with the terms of the above legal provisions and the confidentiality obligations contained therein.

In addition, the Data Controller may obtain knowledge of special categories of data, as follows: Common data and any special data processed in connection with the handling of whistleblowing reports.. Personal data in these special categories are processed in compliance with art. 9 of the GDPR.

Purposes and legal basis of processing: specifically, your data will be processed for the following purposes, relating to the fulfilment of legal or contractual obligations:

- Receipt, analysis and management of the report, as well as the ascertainment of the facts that are the subject of the report and adoption of the consequent measures, in compliance with the provisions of Legislative Decree No. 24 of 10 March 2023.

Further to your consent, your personal data may be used for the following purposes:

- disclosure of your identity to persons other than those competent to receive or act on the reports (paragraph 2 of Article 12 of Legislative Decree 24/2023) or in the course of the proceedings, where the charge is based, in whole or in part, on the report and knowledge of his identity is indispensable for the accused's defence (paragraph 5 of Article 12 of Legislative Decree 24/2023).

Your contribution of data is optional with regard to the abovementioned purpose, and any refusal of consent will not affect the continuation of the relationship or the congruency of the processing.

Processing procedures. Your personal data may be processed by the following ways:

- Oral treatment;
- computer processing;
- temporary processing in anonymous/anonymised form if chosen by the reporter.

All data are processed in compliance with the procedures specified in articles 6 and 32 of the GDPR and with the adoption of the appropriate security measures required.

Your data will only be processed by persons specifically authorised by the Data Controller, and specifically by the following categories of authorized persons:

- Employees in charge of data processing;
- Report Manager, i.e. the person(s) in charge of receiving and managing reports, appointed in accordance with Article 4(2) of Legislative Decree 24/2023.

Disclosure. Your data may be disclosed to external entities for the correct management of the relationship and specifically for the following categories of

Recipients, including all the duly designated Data Processors:

- Disclosure to legally obligatory bodies relating to whistleblowing regulations under Legislative Decree 24/2023;
- Investigating authorities;
- Judicial Authority.

Distribution: Your personal data will not be distributed in any way.

Data Storage Period. In accordance with the principles of lawfulness, limitation of purpose and minimisation of data, pursuant to art. 5 of the GDPR, the data storage period for your personal data is:

- limited to 72 hours following the recording.

Data Controller: the Data Controller, as defined by the Law, is MEI S.r.l. (Via Ing. Caproni 50 , 24036 Ponte San Pietro (BG), VAT no. 02053210163, contactable as follows: e-mail legal.corporate@meisystem.com, telephone 035339112) in the person of its current legal representative.

You are entitled, by application to the Data Controller, to obtain the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to their processing, and in general to exercise all your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory authority.

2. The data subject has the right to be informed of:

a. the source of the personal data;
b. the purposes and methods of processing;
c. the logic applied if the data are processed by electronic devices;
d. the identification data concerning the Data Controller, the Data Processors and the representative designated as per article 5, comma 2;
e. the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

a. the updating, rectification or, where interested therein, integration of the data;
b. the erasure, anonymisation or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;
d. the portability of the data.

4. The data subject has the right to object, in whole or in part:

a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

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Data subject consent form

Data : ..... Place : .....

Name, Surname: .....

Do you consent to the processing of your personal data for the optional purposes set out below?

☐ **YES** ☐ **NO** disclosure of your identity to persons other than those competent to receive or act on the reports (paragraph 2 of Article 12 of Legislative Decree 24/2023) or in the course of the proceedings, where the charge is based, in whole or in part, on the report and knowledge of his identity is indispensable for the accused's defence (paragraph 5 of Article 12 of Legislative Decree 24/2023).

Data subject: