

Information on personal data processing pursuant EU Regulation 2016/679 WHISTLEBLOWING

This document describes the methods used to process the personal data relating to reports made by employees or by any other stakeholders directly or indirectly involved in a company project or activity, regarding any violations or suspected violations of the Code of Ethics as well as any unlawful conduct pursuant to Italian Legislative Decree 231/2001, based on precise and consistent facts, of which such stakeholders have become aware as a result of the functions performed, and any violation of national or EU regulatory provisions that harm the public interest or the integrity of the 2i Rete Gas Group, of which such stakeholders have become aware in a work environment; the methods described in this document aim to ensure that the processing of the personal data concerning the whistleblower and the persons referred to in the aforementioned reports takes place in compliance with the principles of EU Regulation 2016/679 on the protection of individuals with regard to the processing of personal data (hereinafter, the “GDPR”).

This information is provided pursuant to Article 13 of the GDPR. In particular, it allows individuals who submit a report through the channels specifically set up by the company to know the nature of the data pertaining to them collected by the Data Controller, the purposes and methods of processing, the retention period, any recipients, as well as their rights as data subjects.

All data will be processed in full compliance with the applicable provisions on personal data protection and pursuant to the provisions of Legislative Decree 24 of 10 March 2023, as subsequently amended.

Contact details of the Data Controller

The Data Controller of your Personal Data provided is 2i Rete Dati S.r.l., with registered office in Milan, Via Albricci 10.

The Data Protection Officer is Cogitek srl Via Fregene 14, 00183 Rome, email cogitek@legalmail.it, in the person of Mr. Pierantonio Piana.

Purpose of processing and legal basis

Article 1, Paragraph 51, of Law 190/2012 (the “Anti-Corruption Law”) introduced a measure aimed at encouraging the reporting of unlawful offences, known as “whistleblowing”, within the scope of Article 54-bis of Legislative Decree 165/2001, as subsequently amended by Law 179 of 30 November 2017 entitled “provisions for the protection of persons who report offences or irregularities of which they have become aware, in a public or private employment relationship”.

Specifically, Law 179 of 30 November 2017 established a series of protections for employees or collaborators in the public or private sector who report crimes or violations relating to the 231 Model, of which they have become aware during the performance of their duties.

On 23 October 2019, the European Parliament and the Council adopted the Directive on the “Protection of persons who report breaches of Union law”, which came into force on 17 December 2021.

On 15 March 2023, Legislative Decree 24 of 10 March 2023, implementing the aforementioned Directive (EU) 2019/1937 on the protection of persons who report any violations of national or EU regulatory provisions that harm the public interest or the integrity of the public administration or private entity, of which they have become aware in a public or private work environment, was subsequently published in Official Journal No. 63. The new provisions, which came into force on 15 July 2023, led to the updating of national regulations on whistleblowing and the simultaneous repeal of: a) Article 54-bis of Legislative Decree 165/2001; b) Article 6, Paragraphs 2-ter and 2-quater, of Legislative Decree 231 of 8 June 2001; and c) Article 3 of Law 179 of 30 November 2017.

In light of the above, the Data Controller processes your personal data exclusively to manage, in full compliance with the law, any reports received from you regarding violations of national and European regulations governing the activity of 2i Rete Dati, or violations of the principles and rules of conduct set out in the Code of Ethics and the Company's 231 Model and/or

unlawful or fraudulent conduct attributable to employees, managers, members of the corporate bodies or third parties (customers, suppliers, consultants, collaborators and group companies) which could, directly or indirectly, harm the integrity of the Company or of the 2i Rete Gas Group.

If necessary, the Company may process the Personal Data that you provided in the report for the activation of judicial and/or disciplinary protection connected to the report received, where the relevant conditions apply.

The processing of your Personal Data is therefore carried out in order to fulfil a legal obligation of the Data Controller and to follow up, in accordance with the law, the report received (Article 6(1)(c) of the GDPR), and in the legitimate interest of the Company if necessary to ensure judicial or disciplinary protection for you or the person reported, if the relevant conditions are met.

The provision of your Personal Data is therefore optional. However, failure to provide the same could jeopardise the investigation of the report: anonymous reports are only taken into consideration if they contain adequate details and specific information that identify events and situations connected to specific contexts.

Methods of processing and data processors

Data processing is carried out by electronic means (including voice messaging systems), as well as by paper methods, adopting the security measures necessary to guarantee the full protection of personal data and compliance of the processing with the principles of the GDPR.

Before processing your Personal Data, the Company carries out a Data Protection Impact Assessment in order to verify the suitability of the security measures applied to the processing. In any case, the data processed is not subject to any automated decision-making processes.

Specifically, data is acquired when data subjects send reports using the confidential channels previously identified by the Company and published on both the intranet and the company website, which consist of:

- sending an email to the address shown below, protected by authentication and encryption mechanisms
WB.dati@2iretegas.it
- sending a letter to the following address
2i Rete Dati S.r.l. – Organismo di Vigilanza Codice Etico – Via Alberico Albricci, 10, 20122 Milan.
- making a verbal report through the automatic messaging system set up especially, at the following number [+39 02 93899 300](tel:+390293899300)
- or during a direct meeting with the body responsible for analysing the report, upon the specific request of the whistleblower.

The only persons authorised and empowered to view and process the aforementioned reports, using specific electronic systems that guarantee the segregation of information, are exclusively the members of the Company's Supervisory Body, appointed pursuant to Legislative Decree 231/2001, who will process your Personal Data and that of any third parties acquired as a result of the report in compliance with the principles established by the GDPR and according to the purposes set out in Legislative Decree 24 of 23 March 2023. These persons may communicate the content of the reports to third parties while maintaining confidentiality regarding the identity of the whistleblowers, if considered strictly necessary following the evaluation of the report.

It is also understood that the processing of your Personal Data will be carried out ensuring full and complete compliance with all protection measures required by law to safeguard the whistleblower and all other subjects protected by the Law.

The Company will adopt every security measure deemed adequate to keep your identity confidential, from the moment it receives the report and throughout its subsequent management - also during any internal investigation and analysis phases, if necessary.

Categories of personal data processed

Reports must not contain any special categories of data (referred in Article 9(1), of EU Regulation 2016/679 to as information “revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”) or personal data relating to criminal convictions and offences or related security measures (Article 10 of EU Regulation 2016/679).

Should the reports contain any such data, the Company will delete the same unless its processing is strictly necessary for the management of the report, as authorised by law or by a provision of the Italian Data Protection Authority or in any case by order of the Public Authority.

Personal data recipients and categories of recipients

The members of the Supervisory Board are the recipients of the data collected following the report. In the cases provided for by law and following evaluation of the report, your Personal Data may be communicated to the relevant authorities.

Disclosure of data

Your Personal Data will not be communicated and/or disclosed to unauthorised processors.

Data Retention

Your data will be stored in accordance with the law.

Transfer of personal data

The data collected is stored in Italy and in the EU and no data is transferred to third countries or international organisations.

Rights of the Data Subject

In accordance with Article 15 of EU Regulation 2016/679, you have the right to:

- obtain confirmation of the existence or non-existence of personal data and communication of the same in an intelligible form, and to be informed of the origin, purpose and methods of processing;
- obtain indication of the identification details of the data controller, the data processors and the subjects or categories of subjects to whom your Personal Data may be communicated;
- verify the accuracy of your Personal Data and to request additions, updates or corrections;
- request the erasure, transformation into anonymous form or blocking of personal data processed in violation of the law, as well as the limitation thereof pursuant to the law and in any case to oppose the processing of your personal data for legitimate reasons, except as provided for under Article 17, Paragraph 3, of the GDPR Regulation;
- data portability as well as the right to submit a complaint, report or appeal to the Italian Data Protection Authority, provided the conditions are met.

For more information on your Personal Data, please contact the Data Protection Officer at the following email address: cogitek@legalmail.it

Please remember that you are entitled to submit complaints to the Italian Data Protection Authority via:

- Certified letter with return receipt addressed to: Garante per la protezione dei Dati Personali, with registered office in Piazza Venezia 11, IT-00187, Rome;

2i Rete Dati

- Email to the address: protocollo@gpdp.it, or: protocollo@pec.gpdp.it;
- Contact center: +39 06696771