



Privacy Notice pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR") – Whistleblowing

1. Data Controller

The Data Controller of your personal data is **Alientech srl**, sole shareholder company, VAT No. IT02007510023, with registered office at Via dei Cordari 1, 13039 Trino (VC), Italy (hereinafter referred to as "Alientech srl" or the "Data Controller").

2. Purpose of this Privacy Notice

This Privacy Notice describes how Alientech srl processes personal data collected in connection with the management of whistleblowing reports submitted through the reporting channels adopted pursuant to Legislative Decree No. 24/2023 and the applicable legislation.

This Privacy Notice is addressed to Reporting Persons, as well as to any individuals involved in, mentioned in, or otherwise affected by a report.

For information regarding the available reporting channels, reporting procedures and the updated contact details of the Whistleblowing Reports Officer, please refer to the Whistleblowing Procedure available on Alientech srl's website.

3. Categories of personal data processed, purposes, legal basis and nature of the provision of data

Purpose of processing	Categories of personal data processed	Legal basis	Provision of data
Receipt and management of whistleblowing reports	Identification and contact details of the Reporting Person (if provided), information relating to the reported facts, documents attached to the report, and any data relating to persons involved in or mentioned in the report	Compliance with legal obligations pursuant to Legislative Decree No. 24/2023 and Art. 6(1)(c) GDPR	Optional. However, failure to provide sufficient information may make it impossible to manage or verify the report
Management of internal investigations and related verification activities	Information contained in the report, documentation collected during investigations and any statements provided by persons involved	Compliance with legal obligations pursuant to Art. 6(1)(c) GDPR and the legitimate interest of the Data Controller in preventing unlawful conduct and protecting its rights pursuant to Art. 6(1)(f) GDPR	Necessary for the management of the report

Purpose of processing	Categories of personal data processed	Legal basis	Provision of data
Protection of the Data Controller's rights and management of judicial, administrative or disciplinary proceedings	Data contained in the report, investigation records and supporting evidence	Legitimate interest of the Data Controller in protecting its rights pursuant to Art. 6(1)(f) GDPR and, where applicable, compliance with legal obligations pursuant to Art. 6(1)(c) GDPR	Necessary within the limits of the pursued purposes
Management of audio and/or video recordings made during meetings or interviews, subject to prior consent	Audio and/or video recordings and related contents	Consent of the data subject pursuant to Art. 6(1)(a) GDPR	Optional. In the absence of consent, the meeting may be documented through alternative means

Within the scope of whistleblowing reports, Alientech srl may also process special categories of personal data pursuant to Art. 9 GDPR and personal data relating to criminal convictions and offences pursuant to Art. 10 GDPR, exclusively where strictly necessary for the management of the report and in accordance with the applicable legislation.

4. Collection of personal data

Personal data may be collected:

- directly from the Reporting Person;
- through the reporting channels provided for by the Whistleblowing Procedure;
- from persons involved in or mentioned in the report;
- through documentation collected during investigation and verification activities.

Reports may be submitted through written, oral or electronic channels, including direct meetings or voice communications, in accordance with the Whistleblowing Procedure.

5. Processing methods

Personal data are processed using paper-based, electronic, IT, telematic and digital tools, in compliance with the principles of lawfulness, fairness, transparency, data minimisation and confidentiality set out in the GDPR and the applicable legislation.

Alientech srl implements appropriate technical and organisational measures to ensure the security, integrity, availability and confidentiality of the personal data processed and to prevent unauthorised access, disclosure, alteration or destruction of such data.



Access to personal data is restricted to authorised personnel who have received specific instructions regarding the processing activities.

6. Confidentiality of the Reporting Person's identity

Alientech srl implements appropriate measures to protect the confidentiality of the identity of the Reporting Person, of the persons concerned and of any individuals mentioned in the report, in accordance with Legislative Decree No. 24/2023.

The identity of the Reporting Person will not be disclosed without their consent, except where disclosure is expressly required by law or where such disclosure is necessary in the context of judicial, disciplinary or administrative proceedings before the competent authorities.

7. Recipients of personal data

Personal data may be disclosed exclusively to persons or entities authorised or entitled to process such data for the purposes described in this Privacy Notice, including:

1. The Whistleblowing Reports Officer appointed by Alientech srl, acting as Data Processor pursuant to Art. 28 GDPR;
2. Authorised personnel of Alientech srl, strictly within the limits necessary for the handling of the whistleblowing report;
3. Legal advisors, technical consultants or other professionals appointed to support investigative activities;
4. Judicial authorities, administrative authorities or other competent public bodies, in the cases provided for by law;
5. Providers of IT services, hosting services, cloud services or digital platforms used for the management of reporting channels, appointed as Data Processors where necessary.

8. Transfers of personal data outside the EEA

In connection with the use of IT tools, cloud services or digital platforms, certain personal data may be transferred to countries outside the European Economic Area ("EEA").

In such cases, transfers shall take place exclusively in accordance with Articles 44 and seq. of the GDPR, by adopting the appropriate safeguards required under applicable law, including adequacy decisions adopted by the European Commission or Standard Contractual Clauses.

9. Data retention period

Personal data processed in connection with whistleblowing reports will be retained for the period strictly necessary to manage the report and, in any event, for no longer than five years from the conclusion of the proceedings or from the final outcome of the report, unless a longer retention period is required by law or is necessary for the protection of the rights of the Data Controller or third parties.

10. Profiling and automated decision-making

Personal data processed in connection with whistleblowing reports are not subject to automated decision-making processes or profiling activities pursuant to Art. 22 GDPR.

11. Rights of data subjects

Where provided for by the GDPR, data subjects may exercise the rights set out in Articles 15 and seq. of the GDPR, including the right to:

- obtain confirmation as to whether personal data concerning them are being processed;
- access their personal data;
- request the rectification or updating of inaccurate personal data;
- request the erasure of personal data where permitted by law;
- request the restriction of processing;
- object to processing where permitted by the applicable legislation;
- lodge a complaint with the competent Data Protection Authority.

The exercise of such rights may be restricted in the cases provided for by Article 2-undecies of Legislative Decree No. 196/2003 and by the whistleblowing legislation where the exercise of those rights could result in actual and concrete prejudice to the confidentiality of the Reporting Person's identity or to the investigation activities relating to the report.

12. How to exercise your rights

You may exercise your rights at any time or request further information regarding the processing of your personal data by contacting Alientech srl through one of the following channels:

- a) Registered mail with acknowledgement of receipt: Via dei Cordari 1 – 13039 Trino (VC) – Italy
- b) E-mail: legal@alientech.to
- c) Certified e-mail (PEC): alientechsrl@legalmail.it

13. Updates to this Privacy Notice

This Privacy Notice may be amended or updated from time to time, including as a result of changes in legislation, organisational arrangements or technical aspects relating to the whistleblowing system adopted by Alientech srl.

The updated version of this Privacy Notice will be made available through Alientech srl's official communication channels.

Version 1.00 – Last updated: 17/06/2026