

STUDIO TRE Società Benefit S.p.A. a Socio Unico

Via della Previdenza Sociale 8 G/H

42124 Reggio Emilia (RE), Italy

VAT no. 02046360356

Certified email (PEC): traduzionistudiotre@pec.it

Information on personal data processing (Articles 13-14 of Regulation EU No. 2016/679)

Data Subjects: Whistleblowers and reported parties.

STUDIO TRE Società Benefit S.p.A. a Socio Unico, as the Data Controller pursuant to Regulation EU 2016/679 (GDPR) hereby informs you that this policy is intended to protect the data subjects in connection with the processing of their personal data. All data is processed in accordance with the principles of fairness, lawfulness, transparency and protection of your rights and confidentiality.

Your personal data will be processed in accordance with the provisions of the above regulation and with the related confidentiality obligations.

Furthermore, the Data Controller may become aware of special categories of personal data, specifically: Common data and any special data processed in connection with the handling of whistleblowing reports. The processing of personal data for these special categories is carried out in accordance with Article 9 of the GDPR.

Purposes and legal basis of the processing: your data will be processed for the following purposes related to the fulfilment of a legal obligation, the performance of a task of public interest or the pursuit of a legitimate interest of the data controller (pursuant to Article 6(1)(c) and (e) of the GDPR).

- Receipt, analysis and management of the report, as well as the ascertainment of the facts detailed in the report and the adoption of the consequent measures, in compliance with the provisions of Italian Legislative Decree no. 24 of 10 March 2023.

Methods of the data processing. Your personal data may be processed as follows:

- By registered mail, for the attention of the Head of the Compliance Function or the SB (if the report concerns matters involving the Head of the Compliance Function). To benefit from the guarantee of confidentiality, the report must be placed in a sealed envelope marked as
 - “confidential/personal” on the outside.
- In oral form, by means of a statement issued and recorded in a report by the Head of the Compliance Function.
- In anonymous form, if chosen by the whistleblower, using the designated locked box located in the kitchen of STUDIO TRE SB SPA a Socio Unico. Only the Head of the Compliance Function has the keys to this box and is authorised to view the reports in question.

Each processing operation complies with the procedures indicated in Articles 6 and 32 of the GDPR and adequate minimum security measures will be adopted.

Your data will only be processed by personnel expressly authorised by the Data Controller and in particular by the following categories of authorised persons:

- Report manager, i.e. the person(s) tasked with receiving and handling reports, appointed in accordance with Article 4(2) of Italian Legislative Decree no. 24/2023.

Disclosure — Your data may be communicated to external parties where required for the correct management of the contractual relationship, and in particular to the following categories of Recipients, including all the duly appointed Data Processors:

- Judicial authority.
- Disclosure to statutory bodies relating to whistleblowing regulations under Italian Legislative Decree 24/2023.

Dissemination: Your personal data will not be disseminated in any way.

Storage Period. Please note that in accordance with the principles of lawfulness, purpose limitation and data minimisation pursuant to Article 5 of the GDPR, your personal data will be stored as follows:

- The data may be stored for up to five years from the date of the communication of the final outcome of the whistleblowing procedure (Art. 14 of Italian Legislative Decree no. 24/2023).

Data Controller – The Data Controller for all legal purposes is STUDIO TRE Società Benefit S.p.A. a Socio Unico (Via della Previdenza Sociale 8 G/H, 42124 Reggio Emilia (RE), Italy, VAT no. 02046360356).

The Data Protection Officer (DPO) designated by the Data Controller pursuant to Article 37 of the GDPR, whose contact details are available on the company website (<https://www.traduzionistudiotre.it/contatti/>), may be contacted by email at dpo@empathia.it, or by certified email at: empathia@legalmail.it. The DPO is:

- Empathia s.r.l. (contact details: at the company's head office).

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 of the existence of personal data concerning them even if not already stored, the communication of such data in an intelligible form, and the right to lodge a complaint with the Data Protection Authority.

2. The Data Subject has the right to be informed of:

- a. the origin of the personal data;
- b. the purposes and methods of the processing;
- c. the logic applied in the case of processing by electronic instruments;
- d. the identification details of the data controller, the data processors and the representative designated according to Article 5(2);
- e. the entities or categories of entities to which the personal data may be communicated or which may receive the data in their capacity as designated representatives in the territory of the State, or as data processors or persons in charge of the data processing.

3. The Data Subject has the right to obtain:

- a. the updating, rectification or, where interested, the integration of the data;
- b. the erasure, anonymisation or blocking of data that has been processed unlawfully, including any data that is no longer required for the purposes for which it has been collected or subsequently processed;
- c. confirmation that the operations referred to in paragraphs (a) and (b), and their content, were brought to the attention of the persons to whom the data was disclosed or circulated, except in cases where this is impossible or requires the use of resources that are manifestly disproportionate to the protected right;
- d. data portability.

4. The Data Subject has the right to object, in whole or in part:

- a. on legitimate grounds, to the processing of their personal data even if relevant to the purpose for which they were collected;
- b. to the processing of personal data concerning them, where it is carried out for the purpose of sending advertising or direct sale materials or for conducting market surveys or business communications.

To exercise their rights, the data subject may contact the Data Controller or DPO (Data Protection Officer), who can be contacted at the following addresses:

- DATA CONTROLLER – Studio Tre SB S.p.A. a Socio Unico, Via della Previdenza Sociale 8 G/H - 42124 Reggio Emilia (RE), Italy, tel. +39 0522-323434, certified email (PEC): traduzionistudiotre@pec.it
- DPO – email: dpo@empathia.it or certified email (PEC): empathia@legalmail.it.