



WHISTLEBLOWING PRIVACY NOTICE

Pursuant to Article 13 EU Regulation No. 2016/679 (hereinafter, "**GDPR**") and the relevant national legislation, we inform that your personal data provided as part of the offenses and irregularities reporting sent through the Whistleblowing Platform or the voice channel on the website www.rina.org will be processed in the following ways and for the following purposes.

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

RINA S.p.A., with legal office in Genoa (GE), via Corsica 12, Tax Code and VAT No. 03794120109, as well as the companies of the RINA Group to which the reports refer (together hereinafter the "Joint Controllers") are the Joint Controllers of pursuant to art. 26 GDPR. Joint controllers can be reached through the contacts indicated on the website www.rina.org. The Data Protection Officer of the Rina Group can be contacted at the e-mail address rina.dpo@rina.org.

2. DATA SUBJECT CATEGORIES

Data subject is the identified or identifiable natural person to whom the personal data refers. For the purposes of this privacy notice pursuant to art. 13 GDPR, the following interested parties are the data subjects to whom this privacy notice is addressed:

- the reporting person: the natural person who reports the violations acquired in the context of his/her work context;
- the facilitator: a natural person who assists a reporting person in the reporting process, operating within the same working context and whose assistance must be kept confidential;
- the person involved: the natural person mentioned in the report as a person to whom the violation is attributed or as a person in any case implicated in the reported violation.

3. PROCESSING OBJECT

The Joint Controllers will process the personal data of the data subjects (hereinafter also "data") identifying, contacting, relating to the relationship with the RINA Group, as well as all other data that will be entered by the reporting person when in the filling of the reporting form or subsequently acquired by handlers of reports in the context of the preliminary investigation. It is not excluded that the Joint Controllers may also process particular categories of data, referred to in articles 9 and 10 of the GDPR where they are necessary to follow up on the report received.

The reporting person is informed that the provision of personal identification data is optional and voluntary. In any case, if you do not intend to provide your personal data to the Joint Data Controllers, the reporting person may make the report anonymously or semi-anonymously, i.e. agreeing to provide their identity only to the supplier of the Whistleblowing Platform without authorizing its transmission to the RINA Group. In the latter case, the data controller is the supplier Safecall Limited, a circumstance for which we therefore invite you to read the related privacy notice at the following link: [Whistleblowing Data Privacy Policy - Safecall Ltd](#) .

4. PURPOSE AND LEGAL BASIS OF PROCESSING

The Joint Controllers will process the personal data of the data subjects only for the following purposes:

- taking charge of the report by the handlers,
- sending any requests and/or receiving feedback on requests sent by the whistleblower and by the



handlers of the report,

- preliminary management: execution of checks on the validity of the report,
- management of the consequent measures, also from a disciplinary point of view.

The legal basis of the aforementioned processing can be found in the fulfillment of the legal obligation pursuant to art. 6, par. 1, lit. c) of the GDPR as described in Legislative Decree no. 24/2023 where the Joint Controllers involved operate in Italy or in other local regulations which transpose the contents of the European Directive 2019/1937.

The legal basis can also be found, as regards the processing of particular categories of data, in article 9, par. 2, lit. b) of the GDPR as the processing is necessary to fulfill the obligations and exercise the specific rights of the data controller or of the data subject in the field of labor law and social security and social protection, as well as in article 9, par. 2 lett. g) of the GDPR as the processing is necessary for reasons of significant public interest.

The processing of judicial data which may become necessary for the management of received whistleblowing reports is legitimate on the basis of art. 10 GDPR.

5. PROCESSING METHODS AND STORAGE TIMES

The personal data of the data subjects will be processed by the Joint Controllers pursuant to art. 5 of the GDPR and in compliance with the principles of lawfulness, correctness and transparency.

Personal data will be kept for a period of time not exceeding 5 years from the closing date of the investigation relating to the report (or for the different time defined by the local legislation of the Joint Controller if shorter). If the Joint Controllers have documented need to keep the data for a period of more than five years (for example in the event that the cancellation could compromise the legitimate right of defence), further conservation can take place by limiting access to the data only to those responsible of the Legal function until the relative dispute is closed. It is understood that personal data which are manifestly not useful for the processing of a specific report are not collected or, if collected accidentally, are deleted immediately.

In any case, the adoption of every technical and organizational measure adequate to guarantee the security of personal data pursuant to the GDPR is ensured.

6. RECIPIENTS OF THE DATA

The personal data of the data subjects will be made accessible to subjects formally authorized to process them by the Joint Data Controllers as handlers of the report (as required by the Whistleblowing Procedure published on the website www.rina.org), or to third parties who provide services necessary for the fulfillment of the purposes referred to in point 4, expressly designated as Data Processors. In particular, the data of the data subjects may be accessed by the external entity that manages the Whistleblowing Platform and the voice channel. A complete list of external data processors is constantly updated and available at the Rina S.p.A. headquarters.

Furthermore, the reporting person is informed that the data concerning him/her may not be communicated to persons other than those competent to receive or follow up on the reports, expressly authorized to process such data pursuant to articles 29 and 32, paragraph 4, of the GDPR, without your express consent.

Furthermore, with the express consent of the reporting person to the disclosure of his identity, the data referring to him can be communicated as part of the disciplinary procedure instituted against



the reported person, if the dispute is based, in whole or in part, on the report and the knowledge of the identity of the reporting person is essential for the defense of the accused. Otherwise, the report will not be usable for the purposes of the disciplinary procedure.

The personal data of the data subjects may also be communicated to public entities, for the fulfillment of legal obligations or to satisfy requests from the judicial or public security authorities.

7. DATA TRANSFER

The personal data of the data subjects are also processed and stored outside the European Economic Area, also by inserting them into shared databases and/or managed by third-party companies whether or not they are part of the control perimeter of the Joint Controllers. The management of the database and the processing of such data are bound to the purposes for which they were collected and take place with the utmost respect for the standards of confidentiality and security pursuant to the laws on the protection of applicable personal data.

The Joint Controllers ensure from now on that the transfer of non-EU data will take place in compliance with the applicable legal provisions, also through the provision of Standard Contractual Clauses envisaged by the European Commission and the adoption of Binding Corporate Rules for intra-group transfers.

8. RIGHTS OF THE DATA SUBJECT

In relation to the purposes of the processing and as a data subjects, you have the following rights:

- a) **Right of access to personal data** (art. 15 GDPR): you may obtain confirmation of the existence or otherwise of processing of your personal data, as well as obtain a copy of the aforementioned data;
- b) **Right to rectification** (art. 16 GDPR): you may obtain, without unjustified delay, the rectification of your inaccurate personal data and the integration of incomplete personal data or deletion;
- c) **Right to erasure** (art. 17 GDPR): you may obtain from the Joint Controllers the deletion, without unjustified delay, of the your personal data, in the cases provided for by the GDPR;
- d) **Right to restriction of processing** (art. 18 GDPR): you may obtain from the Joint Controllers the limitation of processing, in the cases provided for by the GDPR;
- e) **Right to data portability** (art. 20 GDPR): you may receive, in a structured format, in common use and readable by an automatic device, your personal data, provided by the Joint Controllers and you may obtain that the same are transmitted to another controller without impediments, in the cases provided for by the GDPR;
- f) **Right to object** (art. 21 GDPR): object at any time to the processing of your personal data, for reasons related to your particular situation;
- g) **Right to lodge a complaint with a supervisory authority** (art. 77 GDPR): make a claim with the appropriate Authorities pursuant to Art. 77 GDPR.

It should be noted that the requests made by Data Subject may be rejected in the cases provided by current legislation. In any case, the Joint Controllers will provide feedback to the data subject, possibly giving evidence of the reasons for the reject. A case that justifies the denial is that in



which the exercise of these rights can cause an effective and concrete prejudice for the carrying out of the defensive investigations connected to the management of the reports or for the exercise of the right in court by the Joint Controllers and / or third parties limited to this period of time.

9. METHODS OF EXERCISING RIGHTS AND COMMUNICATIONS

The Joint Controllers has appointed a Data Protection Officer, who may be contacted at any time for all matters relating to the processing of your personal data and to the exercise of the relative rights.

Therefore, you can contact the Data Protection Officer at any time by sending an e-mail to rina.dpo@rina.org.

Best regards.

The Joint Controllers.