

Disclosure pursuant to Articles 13 and 14 of EU Regulation No. 2016/679 for Whistleblowing reports

ART FROM ITALY DESIGN DI MONTICONE DARIO & C. S.A.S. - P.IVA 02721590020 - registered office in Via delle Industrie, 40 - 13856 Vigliano Biellese (BI), renders this notice pursuant to Articles 13 and 14 of EU Regulation No. 2016/679 (hereinafter GDPR 2016/679), laying down provisions for the protection of persons and other subjects with regard to the processing of personal data, to all data subjects to whom the protections established by Legislative Decree 24/2023 apply (reporter, facilitator, persons in the same work context and work colleagues of the reporter) and to the reported person. It informs you of the following.

1. DATA CONTROLLER

The data controller is ART FROM ITALY DESIGN DI MONTICONE DARIO & C. S.A.S. - P.IVA 02721590020 - registered office at Via delle Industrie, 40 - 13856 Vigliano Biellese (BI), regular e-mail address info@artfromitaly.it, certified e-mail address artfromitalydesign@pec.it

2. SUBJECTS WHO CAN FILE A WHISTLEBLOWING REPORT

This notice is addressed to whistleblowers who, according to Legislative Decree 24/2023, are the individuals who can file a Whistleblowing report and belong to the following categories:

- Subordinate Worker;
- Self-employed person who performs his or her work at it;
- Worker or collaborator who performs work for entities in the private sector that provide goods or services or perform works for the Company;
- Freelancer/consultant;
- Volunteer/Trainee;
- Shareholder/Member;
- Person with functions of administration, management, control, supervision, or representation. even when such functions are exercised on a de facto basis.

3. PURPOSE OF PERSONAL DATA PROCESSING

This privacy policy refers to the processing of your personal data in the context of reporting under Legislative Decree No. 24 of March 10, 2023 - Whistleblowing.

By «processing of personal data» means any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data, even if not recorded in a database, such as collecting, recording, organizing, structuring storage, processing, selection, blocking, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction.

The Data Controller processes personal data to fulfill obligations under Legislative Decree 24/2023; the processing of personal data is aimed exclusively at the application and management of the Reporting procedure, which includes the verification of the facts that are the subject of the report, the resolution of the report, the preparation of the feedback, the adoption of any measures of relief or support for the reporting parties and the establishment of proceedings, including disciplinary, to provide feedback to the questions you have raised about corporate compliance, in accordance with the provisions on Reports, including anonymous, received by ART FROM ITALY DESIGN DI MONTICONE DARIO & C. S.A.S., within the limits of the law.

The processing of personal data has the following purposes:

- a) Enable you to make a Whistleblowing report through an internal channel pursuant to Legislative Decree 24/2023;
- b) allow ART FROM ITALY DESIGN DI MONTICONE DARIO & C. S.A.S., through an internal channel, the receipt, analysis and management of the Whistleblowing report, as well as the ascertainment of the facts that are the subject of the report and the consequent adoption of measures, in fulfillment of the obligations of Legislative Decree 24/2023;
- c) Allow ART FROM ITALY DESIGN DI MONTICONE DARIO & C. S.A.S. to communicate with recipients and / or third parties in dependence of the relationship established and the obligations arising therefrom;
- d) To fulfill legal obligations or to comply with orders from Authorities.

3 TYPE OF PERSONAL DATA PROCESSED

ART FROM ITALY DESIGN DI MONTICONE DARIO & C. S.A.S., in order to fulfill the purposes of execution and management of the Whistleblowing report through the internal channel of the Owner and the activities inherent to this reporting process, as well as for the communication to recipients and / or third parties in dependence of the relationship established and the obligations arising therefrom, processes the following the personal data:

- In your capacity as the reporter: last name, first name, relationship to the company, country in which the alleged

violation;

- common personal data that can be obtained from the report, e.g., identification data, place, manner, and description of the incident; data identifying the reporter, the facilitator, people from the same work environment and co-workers of the reporter involved in the incident, the aggrieved person.

4. PROVISION AND REFUSAL TO PROVIDE PERSONAL DATA

The provision of your personal data, as a whistleblower is necessary for the purpose of the execution and management of the Whistleblowing report through the Holder's internal channel and the activities inherent to this reporting process; any refusal to provide your personal data will result in the inability to fulfill the activities.

5. THE LEGAL BASES FOR THE PROCESSING OF PERSONAL DATA

The legal basis - condition of lawfulness for which your personal data and, if any, personal data of persons you may indicate in the report (reported, facilitator, persons in the same work environment, and co-workers of the reporter) are lawfully processed for the purposes of:

- Enable you to make a Whistleblowing report through an internal channel pursuant to Legislative Decree 24/2023;
- allow ART FROM ITALY DESIGN DI MONTICONE DARIO & C. S.A.S., through an internal channel, the receipt, analysis and management of the Whistleblowing report, as well as the ascertaining of the facts that are the subject of the report itself and the consequent adoption of measures, in fulfillment of the obligations of Legislative Decree 24/2023;
- Allow ART FROM ITALY DESIGN DI MONTICONE DARIO & C. S.A.S. to communicate with recipients and / or third parties in dependence of the relationship established and the obligations arising therefrom

consists of the fulfillment of obligations under the law, a regulation, EU legislation (art. 6 lett. c) GDPR) in particular for the fulfillment of obligations established by Legislative Decree 24/2023 and on the execution of obligations arising from the existing relationship.

The legal basis - condition of lawfulness for which your personal data are lawfully processed for the purpose of disclosure of your identity to persons Other than those competent to receive or follow up the reports (art. 12 paragraph 2 Legislative Decree. 24/2023), or within the framework of disciplinary proceedings, if the dispute is based, in whole or in part, on the report and the knowledge of your identity is indispensable for the defense of the accused (art. 12 paragraph 5 Legislative Decree 24/2023) is constituted ex art. 6 paragraph 1 lett. a) 2016/679 GDPR by your consent specifically expressed in electronic digital form.

6. PROCESSING METHODS, PLACE AND TERM OF STORAGE OF PERSONAL DATA

The personal data that you provide to us are processed by collecting, recording, organizing, storing, consulting processing, modifying, selecting, extracting, comparing, using, interconnecting, blocking, communicating, deleting, and destroying the data (Art. 4 no. 2) GDPR).

The processing will be carried out in automated and/or manual form in compliance with (Articles 29 and 32 GDPR 2016/679).

Specifically, your personal data is processed through online reporting platform that ensures confidentiality through advanced encryption tools.

In order to comply with the principles of lawfulness, purpose limitation and data minimization (art. 5 GDPR 2016/679) and in fulfillment of 'art. 14 Legislative Decree 24/2023, the personal data you provide are kept for the period of time necessary to achieve the purposes for which they are collected and processed and, in any case, no longer than 5 years, which starts from the date of communication of the final outcome of the reporting procedure.

The place of processing of your personal data is the registered office of the Data Controller as indicated above, or any Other place where you and the Data Controller are geolocated.

7. COMMUNICATION OF PERSONAL DATA

The personal data you provide to us will be communicated to qualified third parties and only where imposed by legal obligations or necessary for the performance of the services requested, with the guarantee of your rights and in compliance with EU Regulation No. 2016/679 and the Privacy Code, appropriately appointed as Data Processors or Authorized Persons for processing.

Your personal data may be disclosed to:

- a) SB Italia S.r.l. for the purpose of managing and maintaining the online reporting platform, acting as the Whistleblowing Reporting Manager;
- b) Manager of the internal whistleblowing channel, acting as an authorized and designated person to receive and handle Whistleblowing reports.

The references of the aforementioned individuals will be provided to you, following a written request sent by e-mail to the address of ordinary e-mail info@artfromitaly.it

Pursuant to Article 12 paragraph 2 Legislative Decree 24/2023 following your express consent, your personal data revealing the your identity as a reporting person and any Other information from which such identity may be inferred, directly or indirectly, may be disclosed to persons Other than those responsible for receiving or following up reports, expressly authorized to process such data in accordance with Articles 29 and 32(4) of Regulation (EU) 2016/679 and Article 2 - quaterdecies of the Personal Data Protection Code under Legislative Decree No. 196 of June 30, 2003.

Pursuant to Article 12 paragraph 5 of Legislative Decree 24/2023 following your express consent, your personal data revealing your identity as a reporting person and any Other information from which such identity may be inferred, directly or indirectly, may be disclosed to the persons in charge of the disciplinary proceedings, as part of the proceedings, if the dispute is based, in whole or in part, on the report and the knowledge of your identity is indispensable for the defense of the accused.

The personal data that you provide us will be communicated to entities to which the communication is required to fulfil the obligations required by law, a regulation, EU legislation or an order of the Authority (art. 6 lett. f), c) GDPR): Judicial Authority, to entities required by law related to the legislation of Whistleblowing under Legislative Decree 24/2023.

8. DISSEMINATION OF PERSONAL DATA

The personal data you provide to us are not subject to dissemination.

9. EXTRA EUROPEAN UNION TRANSFER OF PERSONAL DATA

Your personal information that you provide to us through the online reporting platform is not transferred to Countries outside the European Union or the European Economic Area (so-called Third Countries).

Moreover, due to technical requirements for the operation of the information systems of the Data Controller or the Data Processor, your personal data may be to recipients that may be located outside the European Economic Area; in this case, the processing will take place in compliance with the Applicable Legislation. Transfers are alternatively based on an adequacy decision of the European Commission or Other appropriate safeguards provided by the Data Protection Laws or the Standard Model Clauses approved by the European Commission.

In the event that the Europe Commission has not adopted an adequacy decision, the transfer will take place only if there are adequate safeguards provided by the recipient country or organization and provided that the data subjects have enforceable rights and effective remedies.

10. RIGHTS OF THE DATA SUBJECT

At any time, you may exercise, pursuant to Articles 15 to 22 of EU Regulation No. 2016/679, the right to:

- a) Request confirmation of the existence or non-existence of your personal data;
- b) Obtain information about the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom your personal data have been or will be disclosed, and, when possible, the retention period;
- c) Obtain rectification and deletion of data;
- d) Obtain restriction of processing;
- e) Obtain portability of data, i.e., receive them from a data controller, in a structured, commonly used, machine readable format, and transmit them to another data controller without hindrance;
- f) oppose the processing at any time and also in the case of processing for direct marketing purposes;
- g) Oppose automated decision-making related to natural persons, including profiling.
- h) to ask us for access to and rectification or erasure of your personal data or restriction of processing concerning him or her or to Object to its processing, as well as the right to data portability;
- i) revoke consent at any time without affecting the lawfulness of the processing based on the consent given before revocation;
- j) Propose a complaint to a supervisory authority;
- k) Propose a complaint to the Data Protection Authority, following the procedures and directions published on the Authority's official website at www.garanteprivacy.it

Pursuant to Article 2-undecies lett. f) Legislative Decree 196/2003, the rights under Articles 15-22 Reg. EU 2016/679 GDPR may not be exercised by the reporter concerned directly to the Data Controller, as the exercise of such rights could result in actual and concrete prejudice to the right to confidentiality of the identity of the employee who reports an unlawful conduct of which he/she has become aware by reason of his/her office. In such an eventuality whistleblower concerned may exercise his or her rights under Articles 15-22 EU Reg. 2016/679 GDPR through the Garante, in the manner set forth in Article 160 of Legislative Decree 196/2003, which informs the whistleblower concerned that it has carried out all necessary verifications or has conducted a review, as well as of the data subject's right to seek judicial redress.

If the reporting data subject is not an employee of the Data Controller, but belongs to one of the Other categories listed in point 2 above, he or she may exercise his or her rights under Articles 15-22 EU Reg. 2016/679 GDPR through the online reporting platform.

11. SECURITY MEASURES

The Data Controller has adopted and documented specific and appropriate technical and organizational security measures (Art. 32 of EU Regulation No. 2016/679) aimed at minimizing the risk of destruction, loss of personal data, unlawful or incorrect use, unauthorized access, or processing that is not permitted or not in accordance with the purposes for which the personal data are processed.

12. SPECIAL CATEGORIES OF PERSONAL DATA PROCESSED

On the occasion of a Whistleblowing report, the Data Controller may become aware of, and, process, special categories of personal data that qualify as «particular categories of personal data» and that is, those data that reveal «racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as data relating to health, genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's sex life or sexual orientation (Art. 9 of EU Regulation No. 2016/679) as well as personal data «relating to criminal convictions and offenses or related security measures (Art. 10 of EU Regulation No. 2016/679).

The Data Controller, will process these categories of personal data exclusively for the purposes strictly related and instrumental to the verification of the authenticity of reports of irregularities or in order to fulfill specific legal obligations (related to the purposes of the report).

Therefore, I urge you not to enter in any field of the online reporting platform the above personal information that is irrelevant and unnecessary for the purposes of reporting, which, if entered, will be deleted immediately.

The Data Controller - ART FROM ITALY DESIGN DI MONTICONE DARIO & C. S.A.S.

Privacy Policy updated March 11, 2024