



INFORMATION PURSUANT TO ARTICLES 13-14 GDPR REGARDING THE PROCESSING OF PERSONAL DATA WHISTLEBLOWING

1. Identity and Contact Details of the Joint Data Controllers

The joint data controllers for your personal data are:

La Petrolifera Italo Rumena S.p.A., with registered office in 20122 Milan, Via Eugenio Chiesa 4, VAT number 00745880153, represented by the pro-tempore legal representative (hereinafter also "PIR SPA");

La Petrolifera Italo Rumena S.r.l., with registered office in 48123 Ravenna, Via Baiona 249, VAT number 02638000394, represented by the pro-tempore legal representative (hereinafter also "PIR SRL");

Depositi Italiani GNL S.p.A., with registered office in 48123 Ravenna, Via Baiona 249, VAT number 02621060397, represented by the pro-tempore legal representative (hereinafter "DIG");

Petra S.r.l., with registered office in 48122 Ravenna, Via Trieste 290, VAT number 01222890392, represented by the pro-tempore legal representative (hereinafter "PETRA");

Superba S.r.l., with registered office in 16155 Genoa Multedo (GE), Via Multedo di Pegli 15, VAT number 05977170637, represented by the pro-tempore legal representative (hereinafter "SUPERBA").

The joint controllers (hereinafter also "PIR Group Companies") inform you that EU Regulation no. 2016/679 (GDPR) and Legislative Decree 196/2003, as amended, govern the protection of personal data. The PIR Group Companies base the processing of data on the principles of fairness, lawfulness, transparency, and necessity, as provided for by the aforementioned regulations. To this end, pursuant to Articles 13-14 of the GDPR, we provide you with the following information.

2. Type of Data Processed

The receipt and management of reports give rise to the processing of so-called "common" personal data (name, surname, job role, any other information related to the alleged, founded, or presumed illicit conduct, and may also give rise, depending on the content of the reports and the acts and documents attached to them), processing of so-called "special" personal data (data relating to health conditions, sexual orientation, or trade union membership, pursuant to Article 9 of the GDPR), and personal data relating to criminal convictions and offenses (pursuant to Article 10 of the GDPR).

3. Purpose and Legal Basis of the Processing

Personal data is collected and processed for purposes strictly related to the management of reports of unlawful conduct, in violation of national/European regulations, the Code of Ethics, and the Organizational Management and Control Model of the PIR Group Companies.

In accordance with the applicable regulations (EU Directive No. 1937/2019 and Legislative Decree No. 24/2023), the legal basis for this processing is therefore represented by:

- for the processing of common data, Article 6.1 letter c) of the GDPR ("compliance with a legal obligation to which the data controller is subject");
- for the processing of special and judicial data, Article 9.2 letter g) of the GDPR.

4. Processing Methods

The joint controllers undertake to process, in a lawful, correct, and transparent manner, only the data necessary to achieve the essential purposes for the performance of the activities subject to the report. The processing is carried out by the joint controllers also with the aid of electronic means, including automated tools, and tools for receiving oral reports equipped with adequate security measures (file encryption), organizational, technical, and physical measures to protect information from alteration, destruction, loss, theft, or improper or unlawful use.

Reports and documentation related to their management will be retained for five years from the date of communication of the final outcome of the reporting procedure.

The identity of the reporting person and any other information from which their identity can be directly or indirectly inferred will be processed exclusively by persons authorized to process data under Article 29 of the GDPR and will not be disclosed to other parties without their specific consent, as prescribed by Article 12, no. 2 of Legislative Decree 24/2023. Consent is optional and is given at the time of reporting via the platform.

5. Communication and Transfer of Data

Your data will not be disclosed but will be processed by the following parties, indicated by way of example and not exhaustively:

- public authorities to fulfill specific legal obligations and judicial authorities acting as independent data controllers;
- external companies entrusted with reporting management services and information technology service providers, operating as data processors pursuant to Article 28 of the GDPR, subject to confidentiality and only for functional purposes of their assigned task;
- Supervisory Board of the PIR Group Companies;
- consultants possibly involved in the investigation phase;
- any functions involved in the inquiry and investigation phase, expressly authorized and bound by confidentiality.

6. Rights of the Data Subject

Pursuant to Articles 15 to 22 of the GDPR, it is possible to exercise, within the limits of Article 2-undecies of the Privacy Code, the right to:

- a) access personal data;
- b) rectify them in case of inaccuracy;
- c) delete data;
- d) limit processing;
- e) the right to data portability, i.e., to receive personal data provided in a structured, commonly used, and machine-readable format and to transfer it to another data controller without hindrance;
- f) the right to object to processing, where applicable.

In addition, the data subject may lodge a complaint with the Italian Data Protection Authority located at Piazza Venezia 11, 00187 Rome. For further clarification regarding this information or any privacy-related matters, or if you wish to exercise your rights, you may contact: privacy@gruppopir.com.