

**INFORMATION PROVIDED IN COMPLIANCE WITH ART. 13 OF REGULATION (EU) 2016/679 ON PROCESSING OF PERSONAL DATA OF PERSONS CONCERNED OR THIRD PARTIES (FACILITATORS) IN A REPORT OF OFFENCES IN COMPLIANCE WITH ITALIAN LEGISLATIVE DECREE 24/2023 (SO-CALLED WHISTLEBLOWING)**

Marco Viti Farmaceutici S.p.A. (hereinafter referred to as the "Company") in fulfilment of its obligations to set up an internal reporting channel as provided for by Italian Legislative Decree 24/2023 and pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter referred to as the "Regulation"), would like to inform you about how it processes the personal data of persons concerned or third parties (facilitators) should the Company receive a whistleblowing report that may concern you, via the platform at the following link: <https://marcoviti.whistleblowing.it/#/>

It should be noted that all unlawful conduct consisting of breaches of national and European regulatory provisions indicated in Art. 2 of Legislative Decree 24/2023 which concern the Company and which has come to the Company's attention in a work context, in accordance with Art. 3 of Legislative Decree 24/2023, may be reported, including, for example, employees, collaborators, consultants and corporate bodies.

**DATA CONTROLLER**

The data controller is Marco Viti Farmaceutici S.p.A., with registered headquarters in Via Mentana 38, 36100 Vicenza, Italy.

**PURPOSES AND LAWFUL BASIS OF PROCESSING**

The purpose is the management, processing, instruction and analysis of whistleblowing reports received by the Company via the dedicated channel, as well as the consequent feedback.

The purpose of the processing is to comply with a legal obligation set out in Article 4 of Italian Legislative Decree 24/2023 to which the Data Controller is subject (Article 6(1) (c) of the Regulation).

**TYPES OF DATA PROCESSED**

Handling of a whistleblowing report involves the processing of any personal data that may be communicated by the reporting person (personal and contact details and regarding professional qualifications) via the dedicated reporting channel, as well as the personal data contained in the report, including any attached documentation. As part of the reports, data relating to the person concerned or to other third parties involved in the report (facilitators) are also processed. These may concern data including personal and contract details, and also specific data as established by Article 9 of Regulation (EU) 2016/679, as well as information on offences committed by the person.

**PROCESSING METHODS AND CATEGORIES OF DATA RECIPIENTS**

Processing is carried out in accordance with the law, respecting the confidentiality of the identity of the reporting person, the person concerned and any third parties, as well as the content of the report and any attached documentation, including through the adoption of appropriate security measures. The whistleblowing reports and related data may be managed on paper or computer by the Whistleblowing Contact Person specifically trained to handle whistleblowing reports, who acts on the basis of specific written instructions provided by the Data Controller in their capacity as authorised processor. Any third party platform provider acts as a Data Processor pursuant to Article 28 of the Regulation.

The Data Controller may also communicate, when necessary for fulfilment of the purposes of the processing and on the basis of the same conditions of lawfulness indicated, the personal data collected to third parties such as law enforcement agencies, competent authorities (e.g. ANAC or Judicial Authorities) and other public administrations.

#### **DATA RETENTION PERIOD**

The data will be processed in the Data Controller's paper and computer archives and protected by suitable security measures for a period of time no longer than is necessary to achieve the purposes for which they are collected and for any longer period necessary to comply with legal provisions and/or for legal protection purposes, in compliance with ordinary prescriptive terms. Therefore, the data may be retained for five years from the date of the report of the unlawful act or fact, in compliance with the principle of minimisation referred to in Article 5(1)(c) of the Regulation as well as with the legal obligations to which the Data Controller is bound, except in cases where retention for a subsequent period is required for litigation, requests by the competent authorities or pursuant to applicable legislation. At the end of the period of retention your personal data will be deleted or irreversibly anonymised.

#### **DATA TRANSFER TO THIRD COUNTRIES**

The data will not be transferred to third countries outside the European Union.

#### **DATA SUBJECT RIGHTS**

We remind you that you may at any time exercise your rights, in particular with reference to the right of access to your personal data, as well as the right to obtain their rectification or restriction, updating or deletion, portability and the right to object to their processing, unless the Data Controller has a legitimate reason that overrides the interests of the data subject, or for the establishment, exercise or defence of legal claims. You may exercise your rights by contacting the Controller at the above addresses. You may withdraw your consent to processing at any time by contacting the above addresses, unless other conditions exist that make processing necessary.

#### **RIGHT TO COMPLAIN**

We remind you that if you consider your rights to have been breached, you have the right to lodge a complaint with the Supervisory Authority, in Italy represented by the Garante per la protezione dei dati personali (personal data protection authority), or to take legal action in the appropriate courts.

Data Controller  
Marco Viti Farmaceutici S.p.A.