Privacy Notice

LIST S.P.A., with registered office in via Pietrasantina, 123, 56122 Pisa (PI), VAT 00928190503 in its capacity as Data Controller (hereinafter also referred to as the "Data Controller"), informs you pursuant to art. 13 EU Regulation no. 679/2016 (hereinafter also referred to as the "Regulation") that your personal data and, if applicable, those of your family members, including special categories of personal data pursuant to art. 9 of the Regulation, freely communicated by you and acquired by us, will be processed lawfully, correctly and transparently for the purposes and methods indicated below.

1. Categories of data processed

The use of the reporting form will involve the processing of personal data, in particular common data (e.g.
merely illustrative and non-exhaustive: identification data of the whistleblower).
It should be noted that it is strictly forbidden for whistleblowers to enter, in the descriptive section of the report, data belonging to special categories.
These data, in fact, will not be considered either in the preliminary activity or in the investigation activity relating to the report that will be formulated.

2. Legal basis and purpose of the processing

The data referred to in point 1 will be processed for the following purposes and with the following legal bases:

a) management of reports in accordance with the regulatory requirements of Law no. 179/17 containing "Provisions for the protection of authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship**".**
b) Pursuit of the Controller's legitimate interest

Legislative Decree 24/2023 art. 3 applies to LIST S.P.A. in subjective scope.

The provision of personal data for these purposes is necessary, in fact failure to provide it will make it impossible to follow up on the reports received.

3. Processing methods

According to the provisions of the Regulation, the processing carried out will be based on the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimization, accuracy, integrity and confidentiality, as well as the principle of accountability pursuant to art. 5 of the Regulation.
Specific security measures are observed to prevent illicit or incorrect use of data and unauthorized access.
Especially:

- all processed data are encrypted (reporting data, reports) with different crypt keys for each table.
- the whistleblower's data are stored in a separate table with respect to the content of the report made by the whistleblower.
- The report is assigned an identification code called "anonymous". In this way, throughout the reporting management process and even after it has been archived, the whistleblower's personal data will be accessible only to specifically authorized personnel, exclusively for the purpose of allowing checks on the report and in full compliance with current legislation on the subject.

4.Recipients

The personal data collected in this way may be shared, for the purposes referred to in section 1 of this Policy, with:
(i) subjects who typically act as data processors pursuant to art. 28 of the Regulation, or by subjects who cooperate with one of the Data Controllers for the pursuit of the above purposes, including subjects delegated to carry out technical maintenance activities.
(ii) subjects, bodies or authorities to whom it is mandatory to communicate personal data by virtue of legal provisions or orders of the authorities.
(iii) persons authorised by the competent Data Controller, pursuant to art. 29 of the Regulation, to the processing of personal data necessary to carry out activities strictly related to the provision of services, which have committed themselves to confidentiality or in any case have an adequate legal obligation of confidentiality.

5.Communication and dissemination

The data referred to in point 1 may be communicated to the competent authorities of European or non-European countries in order to provide answers to their requests in accordance with the applicable regulation from time to time. Personal data will not be disseminated.

6. Transfer of personal data outside the European Economic Area

Given the international presence of LIST S.p.A., and in order to optimize the quality of the services provided, LIST S.p.A. may have to transfer the personal data collected to countries outside the European Economic Area, whose legal provisions on data protection are different from those of the European Union. In this circumstance, LIST S.p.A. ensures the protection of personal data through the signing of standard contractual clauses or other protection instruments defined by law.

7. Data Retention

Personal data processed for the purposes referred to in section 2 will be kept for the time strictly necessary to achieve those purposes. In any case, since the processing is carried out for the provision of services, the Data Controllers will retain the personal data for the period of time provided for and permitted by Italian law to protect their interests (Article 2220 of the Italian Civil Code and subsequent amendments).
Further information regarding the data retention period and the criteria used to determine this period can be requested by sending a written request to the Data Controller to whom the report was addressed to the relevant address indicated in section 10 of this policy.

8. Exercisable rights

As an interested party, you can exercise the rights referred to in art. 15, 16, 17, 18, 19, 20, 21 and 22 within the limits of the provisions of rty.2-undecies of Legislative Decree no. 196 of 30 June 2003.

9. How to exercise your rights

The above-mentioned rights can be exercised by sending a request to the Data Controller by writing to:

- by post to: LIST Spa, Via Pietrasantina, 123, 56122, Pisa (PI); or
- by e-mail to: dpo-privacy@list-group.com.

10. Contact details of the Data Protection Officer

Data Protection Officer
DPO Email: dpo-privacy@list.com

Pisa, 13 July 2023

Data Controller
(LIST S.p.A.)