

PRIVACY NOTICE

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the processing of personal data in connection with the receipt and handling of reports of breaches of national or European Union legal provisions that harm the public interest or the integrity of the public administration or a private body, of which the whistleblower has become aware in the course of their employment, pursuant to Legislative Decree 24/2023 (Whistleblowing)

Wieland Onda s.r.l., in compliance with the provisions of Legislative Decree No. 24 of 10 March 2023, has established internal channels for receiving reports of breaches of national or European Union regulations that harm the public interest or the integrity of the public administration or a private body (so-called whistleblowing), of which the whistleblower has become aware in the workplace as referred to in Article 3 of Legislative Decree No. 24/2023.

Personal data – relating to the whistleblower and to other individuals involved in various capacities in the reported events (the subject of the report, the facilitator, other individuals mentioned, etc.) – contained in the report and/or in documents attached thereto are processed for the purpose of carrying out the necessary preliminary investigations and verifying the validity of the facts reported.

Pursuant to Article 13 of the General Data Protection Regulation – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the ‘GDPR’) – the following information relating to the processing of personal data is provided below.

Data Controller
The Data Controller is Wieland Onda s.r.l. , with its registered office in Mussolente (VI), Via Dante Alighieri, No. 27/B, registered with the Vicenza Companies Register under registration number, tax code and VAT number 04546290240, email onda@wieland.com (hereinafter also referred to as the “Data Controller” or “Company”).

Optional purposes for which processing does not require the data subject’s consent

Purposes	Legal basis for processing
Management of compliance obligations and preliminary investigations provided for by Legislative Decree No. 24 of 10 March 2023 (Whistleblowing)	(Article 6(1)(c) of the GDPR) Processing necessary to comply with a legal obligation to which the Data Controller is subject, with particular reference to the provisions contained in Legislative Decree 24/2023 (Article 9(2)(b) of the GDPR) Processing necessary to fulfil the obligations and exercise the specific rights of the Data Controller or the data subject in relation to employment law (Article 6(1)(a) of the GDPR) Consent of the data subject for the recording of reports collected by telephone or via voice messaging systems or in any other oral form (Article 6(1)(a) of the GDPR) Consent of the data subject for the purposes of disclosing the identity of the whistleblower, in accordance with the provisions of Article 12 of Legislative Decree 24/2023

Categories of personal data

The collection and management of reports received may give rise not only to the processing of ‘general’ personal

Wieland Onda S.r.l. | Sede legale della società: Via Dante Alighieri, 27B – 36065 Mussolente (VI) – Italia | F +39 0424 87633 | onda@wieland.com | wieland-onda.com
 Numero di registrazione (REA): VI-412126 | Numero di identificazione VAT (P.Iva) e C.F.: 04546290240
 Società soggetta a direzione e coordinamento da parte di Wieland-Werke AG |

PLANT 1 HEADQUARTERS

Via Dante Alighieri, 27B – 36065 Mussolente (VI) – Italy
F +39 0424 87633

PLANT 2

Via. L. Baden Powell, 11 – 36045 Lonigo (VI) – Italy
F +39 0444 720720

PLANT 3

Via Vittoria, 158A – 36065 Mussolente (VI) – Italy
F +39 0424 87506

data (personal details, contact details, other data relating to the reported unlawful conduct, etc.), but also to the processing of ‘special categories’ of personal data (pursuant to Article 9 of the GDPR) and data relating to criminal convictions and offences (pursuant to Article 10 of the GDPR).

Source of personal data

The source of the personal data is the report made by the reporting party and the subsequent investigation.

Recipients of personal data

For the purposes set out above, personal data will be processed by the Reporting Manager (an independent external entity with specifically trained staff).

Personal data may be disclosed to employees and/or contractors of the Data Controller, who are authorised and instructed on how to process such data for the sole purpose of managing and following up on the report, as well as to service providers instrumental to the pursuit of the aforementioned purposes (e.g. providers of the report management platform) and external consultants who will process the data in their capacity as data processors. The list and up-to-date information on the entities identified as data processors is available from the Data Controller.

Where the legal conditions are met, personal data may be disclosed to the competent authorities (e.g. the judicial authorities, the National Anti-Corruption Authority, etc.) which will act as data controllers.

The confidentiality of the whistleblower’s identity is safeguarded in accordance with the provisions of Article 12 of Legislative Decree No. 24/2023.

Retention period for personal data

The criteria used to determine the retention period for personal data are set out below.

Personal data and documents	Retention period or criteria for determining it
Personal data and documents relating to the report	For the time necessary for processing and, in any event, for no longer than five years from the date on which the final outcome of the reporting procedure is communicated

Rights of the data subject

We hereby inform you of certain rights provided for by the GDPR regarding personal data and its processing, which you may exercise by contacting the Data Controller: the right to withdraw consent for processing operations where consent is required, without this affecting the lawfulness of processing based on consent prior to withdrawal (Article 13(2)(c)); the right of access to data (Article 15); the right to rectification (Article 16), the right to be forgotten (Article 17), the right to restriction of processing (Article 18), the right to data portability (Article 20), the right to object (Article 21), and the right to lodge a complaint with the Supervisory Authority (Article 77).

These rights may be exercised by writing to the email address onda@wieland.com.

The form for exercising these rights is available on the Data Controller’s website.

Pursuant to Article 2-undecies of Legislative Decree 196/2003 (Privacy Code), the rights referred to in Articles 15 to 22 of the GDPR (hereinafter, ‘Rights’) may not be exercised by means of a request to the Data Controller or by lodging a complaint pursuant to Article 77 of the GDPR if the exercise of such rights could result in actual and concrete harm to data subjects protected under the provisions on money laundering (paragraph 1, letter a) and/or to the confidentiality of the identity of the person reporting breaches of which they have become aware by virtue of their employment relationship or the duties they perform (paragraph 1, letter f) (hereinafter, collectively, “Interests”).

In such cases, the Rights are exercised in accordance with the laws or regulations governing the sector, which must at least include measures aimed at regulating the areas referred to in Article 23(2) of the GDPR. The exercise of these rights may, in any event, be delayed, restricted or excluded by means of a reasoned notification provided without delay to the data subject, unless such notification would undermine the purpose of the

restriction, for as long as and to the extent that this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the data subject, in order to safeguard the Interests. In such cases, the data subject's rights may also be exercised through the Data Protection Authority in accordance with the procedures set out in Article 160 of the Privacy Code. In such circumstances, the Data Protection Authority shall inform the data subject that it has carried out all necessary checks or conducted a review, as well as of the data subject's right to seek judicial redress.

Further information

The personal data provided may be processed by the Data Controller with or without the use of IT tools, in compliance with the confidentiality obligations set out in Article 12 of Legislative Decree 24/2023.

The provision of personal data is optional. However, failure to provide such data may prejudice the investigation of the report.

Amendments and updates

This privacy notice may be subject to amendments and/or additions, including as a result of the applicability of the GDPR and any future regulatory changes and/or updates.

The updated policy is always available on the dedicated whistleblowing platform.