

INFORMATION ON THE PROCESSING OF PERSONAL DATA pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 IN RESPECT OF "WHISTLEBLOWING" REPORTS.

Pursuant to "European Regulation 679/2016 ("**GDPR**") and Legislative Decree n.196/2003 as amended", Eurotech S.p.A. (henceforth also the "**Company**" or "**Eurotech**") provides below the information ("**Information**") regarding the processing of your personal data in case of reports made through the Company's "Whistleblower" channels.

1. Information about the data controller

Eurotech S.p.A., headquartered at Via Fratelli Solari 3/A, 33020, Amaro - UD (Italy) is the Data Controller in relation to the processing activities outlined in this Notice.

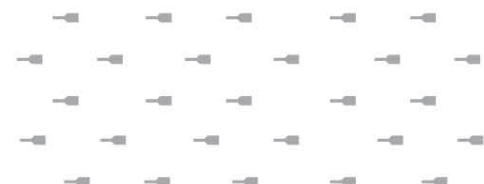
3. Purpose of processing.

Personal data are acquired insofar as they are contained in the report and/or in acts and documents attached to it, refer to the reporting party and may also refer to other parties responsible for the violations or otherwise involved in the events described. The data you directly provide to report alleged unlawful conduct of which you have become aware by reason of your relationship with Eurotech will be processed by Eurotech for the purpose of handling such reports. In particular, Eurotech will process the aforementioned personal data in order to carry out the necessary investigative activities aimed at verifying the merits of what has been reported, as well as, if necessary, taking appropriate corrective measures and taking the appropriate disciplinary and/or judicial action against those responsible for the unlawful conduct.

4. Type of data processed

The Holder may process different categories of personal data in the context of reporting, including:

- **so-called "common" personal data** (e.g., name, address, telephone numbers, personnel identification and e-mail addresses);
- Job data (e.g., job position, department, responsibilities);
- Information related to the report (e.g., description of the incident, people involved, documents, evidence);
- Any other information relevant to the handling of the report.



5. Legal basis of processing

The processing of personal data pursuant to this notice is based on the legal obligation to which the Data Controller is subject (Art. 6(1)(c) of the GDPR), in particular we refer to Legislative Decree No. 24 of March 10, 2023 (Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019 on the protection of persons who report breaches of Union law and on provisions regarding the protection of persons who report breaches of national laws).

6. Persons authorized to process data

The reports are managed as the Report Manager by a **Committee** consisting of two **internal individuals (a Compliance Officer and a Human Resources Officer) and an external individual (a member of the Supervisory Board)**. The external party is entrusted by Eurotech with the Management of Reports, through the signing of a contract. The Whistleblower Manager is the only entity able to associate reports with the identities of whistleblowers.

Eurotech is committed to protecting the confidentiality of the whistleblower, any facilitators of whistleblowers, and the persons reported.

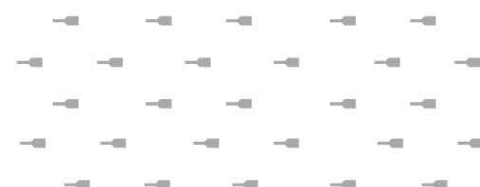
If investigative needs require that other subjects, within Eurotech, should be made aware of the content of the report or of the documentation attached to it, the identity of the reporter will never be revealed, nor will elements that may, even indirectly, allow the identification of the same. Such persons, since they might in any case become aware of other personal data, are all formally authorized to process and specially instructed and trained to do so, as well as required to maintain the secrecy of what they learn by reason of their duties, without prejudice to the reporting and whistleblowing obligations set forth in Article 331 of the Code of Criminal Procedure.

The data may also be known by third parties who support the Data Controller in the management of the company's platform for reporting and/or, if the complexity of the report requires it, by third parties, such as, for example, legal advisors, involved to support the competent functions in the study and management of the case. These individuals will be appointed as data processors and will in any case be held to the strictest confidentiality of the reported data.

7. Recipients of personal data

Your personal data and those of the persons indicated as possibly responsible for the illegal conduct, as well as persons in various capacities involved in the reported events, may be transmitted, upon request, to the Judicial Authority and ANAC, National Anti-Corruption Authority. These subjects are, all of them, Autonomous Data Controllers.

We guarantee our utmost care to ensure that the communication of personal data to the aforementioned recipients involves only the data necessary to achieve the specific purposes for which they are intended



8. Period of data retention

Personal data will be processed for as long as necessary for the management of the specific report and in any case no longer than five years from the date of the communication of the final outcome of the reporting procedure. In the event of the opening of proceedings related to the report, they may be processed until the definition of the proceedings initiated by the offices or entities receiving the report

9. Rights

You have the right, at any time, to exercise the following rights,

- 1. Right of Access:** You have the right to receive confirmation from us whether or not we are processing Personal Data about you and, if so, to request access to the Personal Data. The information you can access includes, among others, the purposes of the processing, the categories of Personal Data concerned, and the recipients or categories of recipients to whom the Personal Data has been or will be disclosed. You have the right to receive a copy of the Personal Data undergoing processing. For additional copies requested, we may charge a reasonable fee based on administrative costs.
- 2. Right of rectification:** You have the right to obtain from us the rectification of inaccurate Personal Data concerning you. Depending on the purpose of the processing, you also have the right to have any incomplete Personal Data completed, including by means of a supplementary declaration.
- 3. Right to erasure (right to be forgotten):** You have the right to request us to erase your Personal Data, in which case we must comply with such a request.
- 4. Right to restrict processing:** You have the right to request the restriction of the processing of your Personal Data. In this case, the data concerned will be marked and may be processed by us only for certain purposes.

According to the provisions of Article 13 c.3 of Legislative Decree 24/2023, which recalls Article 2-undecies of Legislative Decree 196/2003 (Privacy Code), we inform you that the aforementioned rights may not be exercised by the data subjects (with a request to the Data Controller or with a complaint pursuant to Article 77 of the GDPR) if the exercise of such rights may result in actual and concrete prejudice to the confidentiality of the identity of the reporter.

10 Contact

If you wish to exercise your rights as a data subject or if you have any other questions regarding this Notice, please write to privacy@eurotech.com

