

INFORMATION PRIVACY NOTICE

In accordance with 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 connected to the acquisition and management of reports of violations of national or European Union regulatory provisions that harm the public interest or the integrity of the public administration or private entities, of which the whistleblower has become aware within his/her workplace, pursuant to Legislative Decree 24/2023 (**Whistleblowing**)

In compliance with the provisions of Legislative Decree no. 10 March 2023 no. 24, **Onda S.p.A.** has set up internal channels to receive reports of violations of national or European Union regulatory directives which harm the public interest or the integrity of the public administration or private entities (so-called Whistleblowing), of which the reporting party has become aware in the workplace, as defined in art. 3 of the Legislative Decree. n. 24/2023.

The personal data - of the whistleblower and other subjects involved in various capacities in the reported facts (reported, facilitator, other subjects mentioned, etc.) - contained in the report and/or in documents attached to it are processed for the purpose of carrying out the necessary investigative activities and in order to verify the validity of the facts reported.

In accordance with Article 13 of the General Data Protection Regulation – a Directive (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of private individuals with regard to the processing of personal data, as well as on the free movement of such data (hereinafter "**GDPR**"), the information relative to the processing of personal data is indicated below.

Data Controller
The Data Controller is Onda S.p.A. , with its registered office in Mussolente (VI), Via Dante Alighieri, n. 27/B, registered with the Company Registry of Vicenza, registration number, tax code and VAT number 02065440246, e-mail gdpr@onda-it.com (hereinafter also " Owner " or " Company ").

Optional purposes for which the data processing does not require the consent of the interested party

Purposes	Legal basis of processing
Management of the obligations and investigative activities required by Legislative Decree no. 24 on 10th March 2023 (Whistleblowing)	<p><i>(Art. 6, paragraph 1, letter c), GDPR)</i> Processing necessary to fulfill a legal obligation to which the Data Controller is subject, with reference, in particular, to the provisions contained in Legislative Decree 24/2023</p> <p><i>(Art. 9, paragraph 2, letter b), GDPR)</i> Processing necessary to fulfill the obligations and exercise the specific rights of the Data Controller or the interested party in matters of employment law</p> <p><i>(Art. 6, paragraph 1, letter a), GDPR)</i> Consent of the interested party for the recording of reports collected by telephone or via voice messaging systems or in any case in oral form</p> <p><i>(Art. 6, paragraph 1, letter a), GDPR)</i> Consent of the interested party for the purposes of revealing the identity of the reporter, in compliance with the provisions of Art. 12 of Legislative Decree 24/2023</p>

Categories of personal data

The acquisition and management of the reports received may give rise not only to the processing of “common” personal data (personal data, contact details, or other data relative to the illicit conduct reported, etc.), but also to the processing of “particular” personal data ” (ex Art. 9 GDPR) and even data relative to criminal convictions and crimes (ex Art. 10 GDPR).

Source of personal data

The source of the personal data is the report made by the reporter and the subsequent investigative activity.

Recipients of personal data

In order to pursue the purposes indicated above, personal data will be processed by the Reporting Manager (an independent external entity with specifically trained personnel).

The personal data may be communicated to employees and/or collaborators of the Data Controller, who have been authorized and trained on the methods of processing this data for the sole purpose of managing and following up on the report, as well as to suppliers of services instrumental to the pursuit of the aforementioned purposes (e.g. providers of the reporting management platform) and external consultants who will process the data as data controllers.

The list and updated information of the subjects identified as data controllers can be obtained from the Data Controller.

If the legal conditions exist, personal data may be communicated to the competent authorities (e.g. Judicial Authority, National Anti-Corruption Authority, etc.) who will act as data controllers.

The protection of the confidentiality of the identity of the whistleblower is implemented in the forms provided for in Art. 12 of the Legislative Decree. n. 24/2023.

Personal data conservation period

The criteria used to determine the conservation period of personal data is specified below.

Personal Data and Documents	Conservation period or criteria for determining it
Personal data and documents relative to the report	For the time necessary for processing and in any case no longer than five years from the date of communication of the final outcome of the reporting procedure

Rights of the interested party

We wish to inform you of the existence of some rights guaranteed by the GDPR in relation to personal data and the relative processing that you may request from the Data Controller: the right to withdraw consent for the necessary processing, without this affecting the lawfulness of the processing based on the consent before revocation (Art. 13, paragraph 2, letter c), the right of access to data (Art. 15), the right of rectification (art. 16), the right to be forgotten (Art. 17), the right to limit processing (art. 18), the right to portability (Art. 20), the right to opposition (Art. 21), and the right to lodge a complaint with the Supervisory Authority (Art. 77).

These rights can be exercised by writing to the e-mail address gdp@onda-it.com

The form for exercising rights is available on the Owner’s website.

In accordance with Art. 2-undecies of Legislative Decree 196/2003 (Privacy Code), the rights referred to in articles 15 to 22 of the GDPR (hereinafter, “**Rights**”) cannot be exercised with a request to the Data Controller or with a complaint pursuant to Article 77 of the GDPR if the exercise of these rights could result in actual and concrete prejudice to the interested parties protected under the provisions on money laundering (paragraph 1, letter a) and/or the confidentiality of the identity of the person reporting violations of which he became aware due to his employment relationship or the functions performed (paragraph 1, letter f) (hereinafter, jointly, “**Interests**”).

In such cases, these rights are exercised in accordance with the legal or regulatory provisions that control the sector, which must at least contain measures aimed at regulating the areas referred to in Article 23, paragraph 2, of the GDPR. The exercise of these rights may, in any case, be delayed, limited or excluded by means of a communication giving reasons made without delay to the interested party, unless the communication could compromise the purpose of the limitation, for the time and within the limits in which this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the interested party, in order to safeguard their Interests. In such cases, the rights of the interested party can also be exercised through the Guarantor in the manner referred to in Article 160 of the Privacy Code. In this case, the Guarantor must inform the interested party that it has carried out all the necessary checks or has carried out a review, as well as stating the interested party’s right to lodge a judicial appeal.

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Further Information

The personal data provided may be processed by the Data Controller with and without the aid 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. Failure to provide it could, however, jeopardize the investigation of the report.

Changes and updates

The above information may be subject to changes and/or additions, also as a consequence of the applicability of the GDPR and any future regulatory changes and/or updates.

The updated information privacy notice is always available on the platform dedicated to whistleblowing.

ONDA S.P.A.

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