



PRIVACY POLICY PURSUANT TO ARTICLE 13 and 14 OF REGULATION (EU) No 679/2016

Dear User,

This information is provided by the Companies Wind Tre S.p.A., Wind Tre Italia S.p.A., 3Lettronica S.p.A., Wind Tre Retail S.r.l. and OpNet S.r.l. (hereinafter the "Companies") with registered office in via Monte Rosa, 91, 20149 Milano (MI), each in its capacity as independent data controller of personal data relating to the receipt and management of the reports. We illustrate below the purposes and methods with which the Companies collect and process your personal data, which categories of data are processed, which are the rights you can exercise as an interested party and how to exercise them.

Purpose of the whistleblowing system and legal basis

The whistleblowing system (BKMS[®] Incident Reporting) is used to receive, process and manage reports of any violations, including potential violations, of Legislative Decree no. 24/2023, as well as other reports such as: violations of the SA8000 Standard, fraud to the detriment of the Company, violations of company policies and procedures and violations of regulations not provided for in Legislative Decree no. 24/2023.

Data Controller

The Companies are data controllers in the whistleblowing system. The whistleblowing system is operated by a specialist company, EQS Group GmbH, Karlstr. 47, 80333 Munich, which acts as the External Processor for the processing of personal data on behalf of the Companies.

The personal data and information entered in the whistleblowing system are stored in a database managed by EQS Group GmbH, Karlstr. 47, 80333 Munich, and only the Companies have access to the personal data, pursuant to and for the purposes of Art. 28 of the GDPR, on behalf of the Companies.

All data is encrypted and stored with various levels of password protection, so access is restricted to those with the permission of the Companies.

The Companies have appointed a data protection officer. Any questions on data protection and privacy can be sent to: dataprotectionofficer@windtre.it, dpo@opnet.it. The use of the whistleblowing system takes place on a voluntary basis.

Confidential management of reports

The legal basis of the processing pursuant to and for the purposes of Article 6(1) of the GDPR is the confidential handling of reports. All your data is collected and recorded in a lawful and correct manner for the purposes indicated above and is processed, even with the aid of electronic or automated means and specific databases, in ways that are not incompatible with these purposes and in such a way as to guarantee the security and confidentiality of the data.

The personal data collected as part of the reporting management process is processed without the need to acquire specific consent from the reporting/interested party, as the legal basis of the processing is represented by the fulfilment of an obligation deriving from legal provisions for the protection of a significant public interest.



Furthermore, the personal data collected may be processed to respond to requests from the competent administrative or judicial authority and, more generally, from public entities in compliance with the legal formalities.

Personal data is processed by third parties that the Companies use for the management of the reports, as indicated above. The third parties will process the data on behalf of the Companies as Data Processors pursuant to and for the purposes of Article 28 of the GDPR, while the members of the Audit, Compliance 231 & Risk Management Department and the Supervisory Body and any of their auxiliaries act as persons authorised to process the data pursuant to Articles 29 and 32(4) of the GDPR and 2- quaterdecies of the Privacy Code.

Rights of interested parties

In accordance with current regulations, you can exercise the following rights: request and obtain information relating to the existence of your personal data, the purposes of the processing and access to such data; request and obtain the modification and/or correction of your personal data if you believe it is inaccurate or incomplete; request and obtain the cancellation - and/or limitation of processing - of your personal data in the case of data or information that is not necessary - or no longer necessary - for the aforementioned purposes; request and obtain portability in a structured format, commonly used and readable by an automatic device, of personal data that are processed by automated means and request their transfer to another data controller. See the Whistleblowing Policy for more information.

For the exercise of the rights of the interested party indicated above and referred to in Articles 15 and 22 of the GDPR, it is possible to send a written request, or use the appropriate form "Exercise of rights in the field of data protection" downloaded from the website of the Guarantor, to the e-mail address complianceofficer@windtre.it, including "Whistleblowing Request" in the subject line. The rights referred to in Articles 15 to 22 of the GDPR may be exercised within the limits of the provisions of Article 2-undecies of the Privacy Code.

Retention period for personal data

Personal data processed in the context of reporting shall be retained for a period of time not exceeding that necessary for the purposes for which they were collected or subsequently processed and therefore for a maximum of 5 years in accordance with legal obligations or in any case to enable the Companies to protect their own or third parties' rights and legitimate interests (e.g. defence in court). See the Whistleblowing Policy for more information on the retention of personal data.

Using the whistleblowing portal

Communication between your computer and the whistleblowing system is via an encrypted connection (SSL). Your IP address will not be stored while using the whistleblowing system. In order to maintain the connection between your computer and BKMS® Incident Reporting, a cookie is stored on your computer that simply contains your session ID (also called a null cookie). This cookie is only valid until the end of the session and expires when you close your browser.