

INFORMATION PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679 ON PROCESSING PERSONAL DATA OF PERSONS REPORTING UNLAWFUL ACTS

A TLC SRL, a company of the AB Medica group, in its capacity as data controller, informs you of how we process personal data from whistleblowers who report unlawful acts.

Type of data processed and purpose of processing

The whistleblower's information about alleged unlawful conduct within the AB Medica Group is processed. This data is used to investigate the reported misconduct and take appropriate action, including legal proceedings.

Specifically, this data may be processed for the following purposes:

- (a)** management of the Report made pursuant to Legislative Decree no. 24/2023.
- (b)** fulfilment of obligations provided for by law or EU legislation.
- (c)** defense or ascertainment of one's own right in civil, administrative or criminal litigation.

While providing personal data is not mandatory, it may be difficult or impossible to investigate the report without it, especially if the report lacks specific details or verifiable facts.

To manage the report, the Data Controller may also process sensitive personal data about the whistleblower and the individuals involved in the reported misconduct. This includes data like racial or ethnic origin, political opinions, religious beliefs, trade union membership, genetic information, biometric data, health information, or sexual orientation.

Data that is not relevant to the report will be deleted immediately, as required by Article 13 of Legislative Decree 24/2023.

Legal basis for processing

The legal basis of the processing data for the purposes outlined in **letter a)** is the need to comply with a legal obligation to which the Data Controller is subjected, with reference to the provisions contained in Legislative Decree no. 24 of 10 March 2023 ("Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, concerning the protection of persons who report breaches of Union law and laying down provisions concerning the protection of persons who report breaches of national regulatory provisions") and in Legislative Decree no. 231 of 8 June 2001 ("Regulation of the administrative liability of legal persons, companies and associations, including those without legal personality, pursuant to Article 11 of the Law of 29 September 2000, n. 300").

For verbally submitted reports, the legal basis is the whistleblower's consent (GDPR Article 6(1)(a));

The legal basis for processing data for the purposes outlined in **letter b)**, is the Data Controller's obligation to comply with legal requirements (GDPR Article 6(1)(c)).

The legal basis for processing data for the purposes outlined in **letter c)**, is the Data Controller's legitimate interest in defending its rights (GDPR Article 6(1)(f)).

Processing methods

We process personal data collected through the reporting procedure using manual, IT, and electronic tools. Our staff handles the data, ensuring its security and confidentiality. Processing is strictly aligned with the report's purpose.

Data retention

We retain personal data for a maximum of 5 years from when we communicate the outcome of the reporting procedure.

Categories of recipients of personal data

We will not share your data outside the European Union. However, we may disclose it to third parties like judicial authorities, law enforcement, or regulatory bodies if necessary. Our staff also processes the data, following specific instructions.

The whistleblower's identity may be revealed to the disciplinary authority or the reported person only under these conditions:

- The whistleblower explicitly consents.
- The disciplinary charge is based on the report, and knowing the whistleblower's identity is essential for the reported person's defense.

Rights of the data subjects

You have the right to access, rectify, erase, or restrict processing of your data (within the limits of whistleblowing legislation), as outlined in GDPR Articles 15 et seq. You can also withdraw consent.

To exercise your rights or ask questions, contact the Data Controller A TLC SRL:

- Via 1° Maggio 26 – 60131 Ancona (AN) – Italy - for the attention of the Legal Representative
- E-mail: privacy@aethra.com

Right to lodge a complaint:

If you believe that the processing of your personal data violates the GDPR, you have the right to file a complaint with the Data Protection Authority (Article 77 of the GDPR) or take legal action.

Data subjects who believe that the processing of personal data relating to them is in violation of the provisions of the Regulation, have the right to lodge a complaint with the Data Protection Authority, as provided for in Article 77 of the Regulation, or to take legal action.