

## Privacy notice on the reporting system of offences in companies – whistleblowing

We hereby inform You that the privacy policy is provided pursuant to article 13 of the European Regulation 679/2016 – GDPR (hereinafter, also, "**Regulation**") regarding the reporting activities of offences by employees and collaborators (hereinafter, also, "**Whistleblower**") of CAREL Industries S.p.A. and the related check, pursuant to article 6 par. 2-bis of the Legislative Decree 8 June 2001, no. 231, introduced by article 2 of the Law no. 179 of 2017.

### Data Controller and Data Protection Officer

The Data Controller is CAREL Industries S.p.A., based in Brugine (PD), via dell'Industria 11, Italy (hereinafter "**Data Controller**"). You can reach the Data Controller using the following channels: Phone: 049/9716611; E- mail: [privacy@carel.com](mailto:privacy@carel.com).

For any question or request related to the processing of Your personal data, You can reach also the appointed Data Protection Officer (hereinafter "**DPO**"), Avv. Luigi Neirotti, to the address: Studio Legale Tributario, Via Meravigli, n. 14, 20123 Milano. E- mail: [privacy@carel.com](mailto:privacy@carel.com).

### Category of personal data processed

Within the limits of purposes and means defined in this privacy policy, the following personal data may be processed:

1. Personal data, as defined in article 4 no. 1) of the Regulation.
2. Special categories of personal data, as defined in article 9 of the Regulation.

### Purpose and legal basis of the processing

Personal data provided by the Whistleblower to represent the supposed misconducts are processed to verify the truth of the reported fact and to adopt the related measures.

The legal basis for the processing of personal data is the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller pursuant to article 6 letter e) and article 9 letter g) of the Regulation and article 6 par. 2-bis of the Legislative Decree 8 June 2001, no. 231.

### Methods of processing, communication and disclosure of personal data

The processing is carried out by the authorized persons of CAREL Industries S.p.A. according to specific instructions on purposes and means of processing.

Furthermore, the processing might be carried out by Data Processors, appointed and duly instructed. An updated list of Data Processors is available by the controller.

Your personal data will not be disclosed or communicated to third parties, except in cases of legal obligations.

### Transfers of personal data to non-EU countries

Your personal data will not be transferred to companies or other entities outside the European Union.

### Data retention period

Your personal data will be stored for the period strictly necessary to achieve the purposes mentioned above. After 10 years from the end of the legal effects of the report, Your personal data will be definitively erased or anonymized.

### Exercise the rights of the data subject

Pursuant to articles 15-21 of the Regulation, You are entitled to exercise the rights provided for, including: right of access (article 15), right to rectification (article 16), right to restriction (article 18); right to object (article 21); furthermore, You have the right to lodge a complaint with the Italian Data Protection Authority.