

# PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF REGULATION (EU) NO. 2016/679

According to Art. 13 of Regulation (EU) no. 2016/679 ('GDPR') and Legislative Decree 196/2003, as subsequently amended and integrated, Fiere Internazionali di Bologna - BolognaFiere S.p.A. ('BolognaFiere' or 'Data Controller') intends to inform you about the processing of your personal data, in your capacity as the author of a report ('Whistleblower'), or as the subject regarding whom the same is submitted ('Person Concerned'), as part of our management of the whistleblowing requirements governed by Legislative Decree No. 24 of 10 March 2023 ('Decree') and implemented, as per such Decree, in BolognaFiere's Organization, Management and Control Model ('Organizational Model') and in the specific 'Whistleblowing Management Procedure' ('Procedure').

In compliance with the Decree and current legislation on the protection of personal data, the data processing operations carried out by BolognaFiere in the context of whistleblowing are aimed, on the one hand, at the correct and efficient management of the reports received and, on the other, at ensuring the full confidentiality of your identity as a Whistleblower, in particular to protect you from any prejudicial consequences that might arise from the report made.

#### 1. Categories of data subjects and data processed

In your role as a Whistleblower, BolognaFiere will process the following personal data:

- personal and contact information, including, but not limited to: first name, last name, telephone number, email address;
  - information relating to your position or function within BolognaFiere's business organization;
- it should be noted that, if provided by the Whistleblower, the Data Controller may also become aware of data that the GDPR defines as 'special', such as, by way of example, those disclosing your health status, membership of trade unions, or judicial data.

Otherwise, if you are the Person Concerned, the Data Controller will process any data that may be contained in, or inferable from, the report received.

## 2. Purpose and lawful basis for processing

Your data will be processed by BolognaFiere for the following purposes:

a) to process the reports received, in accordance with the Decree, the Organizational Model and the Procedure, verifying the facts that are the subject of the reports, sending the necessary feedback to the Whistleblower and adopting all appropriate measures.

**Legal basis**: the processing of personal data for this purpose is based on the need to fulfill a legal obligation to which the Data Controller, in its quality of employer, is subject by reason of the report received (Art. 6.1, c) of the GDPR);



b) only in presence of your consent, to disclose your identity or any other information from which the same may be directly or indirectly inferred, if the disciplinary proceeding is based in whole or in part on whistleblowing regime, to persons different from those competent and authorized to receive and follow up the reports.

**Lawful basis**: as mentioned, this processing requires your specific consent (Art. 6.1, a) of the GDPR), that you can withdraw at any time, without affecting the lawfulness of the processing carried out up to that moment;

c) to ascertain, exercise and/or defend a right of BolognaFiere or of third parties, including the Data Controller's employees, in judicial proceedings and/or in connection with disciplinary proceedings.

**Lawful basis**: the processing of personal data for this purpose is based on the legitimate interest of the Data Controller (Art. 6.1, f) of the GDPR).

The provision of your personal data takes place on your initiative as the Person Concerned and their processing is necessary to enable BolognaFiere to manage and follow-up on the report received, in accordance with the applicable law and the Procedure. On the other hand, the processing is optional with regard to the purposes described in letters b) and c), in relation to which you may exercise, if justified, your right to object or to deny your consent.

# 3. Recipients or categories of recipients of the Data

Your identity as Whistleblower is properly protected at every stage after you have sent the report and your personal data may be disclosed exclusively to those who, holding individually or collectively specific functions within the Organizational Model or in connection with the management of whistleblowing reports, have been duly authorized and instructed to carry out the necessary processing operations in full compliance with the applicable data protection legislation and the confidentiality obligations imposed by the Decree, namely:

- the members of BolognaFiere's Organizational Model Supervisory Board;
- the Data Controller's employee specifically authorized to receive the relevant reports;
- the Data Protection Officer ('DPO'), when needed;
- the external company that supports BolognaFiere in the management of the whistleblowing platform, i.e. DigitalPA S.r.l., having its registered office in Via San Tommaso d'Aquino 18, Cagliari (09134), VAT No. 03553050927.

In addition, the data collected as part of the reports may also be disclosed to the competent public authorities (e.g., Judicial Authority, or the Italian Data Protection Authority), when required by law, or their prescriptive orders.

Similarly, in the context of an internal disciplinary proceeding, if the charge is based in whole or in part on a report, and the disclosure of your identity as Whistleblower is essential to allow the defense of the Person Concerned, it will be usable for the purposes of disciplinary proceedings only to the extent that you expressly consent to the disclosure of your identity.

## 4. Transfer of personal data



Your personal data will neither be disseminated, nor transferred to countries outside the European Economic Area.

Should a need raise in the future for BolognaFiere to transmit your data to third countries that do not ensure adequate levels of data protection compared to that afforded by the GDPR, the transfer will be carried out only after the signing of specific agreements between BolognaFiere and the data recipients, including appropriate safeguard clauses and guarantees for the protection of personal data, in accordance with the 'Standard Contractual Clauses' approved by the European Commission.

## 5. Duration of processing and retention period

Your data included in the whistleblowing report and the related documentation will be processed for as long as necessary for the management of the same report and the execution of any proceedings that may arise from it. In any case, the processing will not exceed five years from the date of the notification of the final outcome of the reporting procedure, in compliance with the Decree. After the expiration of this period, the data will be permanently erased or irreversibly anonymized.

# 6. Data subjects rights

You may at any time exercise the rights you are vested by Articles 15 - 22 of the GDPR, obtaining:

- a) in the first place, confirmation as to whether or not personal data relating to you are being processed and, if so, access hem, eventually receiving a copy of such data;
- b) the rectification of inaccurate personal data relating to you and the integration of incomplete data;
- c) the erasure of personal data relating to you, if any of the conditions provided for in Art. 17 of the GDPR applies;
- d) the restriction of the processing, i.e. a temporary suspension of the same, in the cases provided for by Art. 18 of the GDPR;
- e) a copy of the personal data relating to you in a structured, commonly used and machine-readable format, including by requesting their transmission to another data controller, if technically feasible.

## 6.1. Right to withdraw your consent

According to Art. 7 of GDPR, you may at any time withdraw any consent you have given for specific processing, without this may affect the lawfulness of any processing carried out prior to such withdrawal.

#### 6.2. Right to object

Pursuant to Art. 21 of GDPR, you also have the right to object at any time, on grounds relating to your particular situation, to processing carried out pursuing a legitimate interest of the Data Controller (let. c) of Section 2). In case of objection, your personal data will no longer be processed, unless legitimate reasons exist, overriding your rights and interests, that allow BolognaFiere to continue the processing, such as if your data are essential for the establishment, exercise or defense of a right of BolognaFiere or of third parties (e.g.



employees) before competent Court.

# 6.3. Right to lodge a complaint with the Italian Data Protection Authority

You may at any time lodge a complaint to the Italian Data Protection Authority (using the form available at this <u>link</u>), if you believe that any processing described in this notice is carried out by BolognaFiere in violation of your rights or in breach of legal obligations.

#### 7. Data Controller and Data Protection Officer

The Data Controller is Fiere Internazionali di Bologna - BolognaFiere S.p.A., with registered office in Bologna, Viale della Fiera n. 20.

To exercise your rights and for any other kind of information, you may at any time write:

- to privacy@bolognafiere.it;
- by regular mail, to the address: Fiere Internazionali di Bologna BolognaFiere S.p.A., Bologna, Viale della Fiera n. 20.

The Data Protection Officer, designated by the Data Controller, may be contacted at any moment writing to: dpo@bolognafiere.it.

