

Information concerning the processing of personal data

Pursuant to Articles 13 and 14 of the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as "GDPR" or "Regulation") - the Company RAI WAY S.p.A, in its capacity as Data Controller, informs you that the personal data provided by you as part of the activities related to the Reporting, carried out according to the indications given in the specific section of the website www.raiway.it (jointly hereinafter "Data"), will be subject, in compliance with the above-mentioned legislation and Legislative Decree 196/2003 (as amended by Legislative Decree 101/2018) as well as in accordance with the obligations of confidentiality that inspire the activity of our Company, to the processing referred to in Article 4 of the Regulations. This information also applies to the Reported Persons and in any case to any subject potentially referred in a Reported Person.

In particular, we wish to inform you of the following:

1. Contact details of the data controller

The data controller is RAI WAY S.p.A., tax code and VAT no. 05820021003, with registered office in Via Teulada, 66, 00195 - Rome, raiway@postacertificata.rai.it, in the person of its Chief Executive Officer.

2. Purpose and Legal Basis of the Treatment

PURPOSE OF THE TREATMENT

The collection and subsequent processing of your data are carried out in order to allow this Company to perform a correct and complete management of the investigative activities necessary to assess the validity of the Reports made regarding:

- alleged violations of the Code of Ethics, the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 and the Anti-Corruption Policy adopted by the Company;
- presumed illegal conduct relevant in accordance with D. Lgs. 231/2001 or violations of other internal provisions or rules of law and regulations applicable to RAI WAY or measures of Public Authorities;
- alleged unlawful, fraudulent or irregular conduct, concerning the sphere of RAI WAY and/or relations with it;
- presumed behaviour that causes damage to the Company's assets or image.

LEGAL BASIS OF PROCESSING

The legal basis of the processing for the purposes indicated above can be found in
- the fulfilment of legal obligations pursuant to art. 6, co. 1, let. c) of the Regulations;
- in the legitimate interest of the Company, pursuant to art. 6., co. 1, let. f) of the Regulation.

3. Nature of the conferment of Data

The conferment of your data is necessary in order to allow the Company to achieve the purposes referred to in paragraph 2 of this statement. Failure to provide data, or providing partial or inaccurate

data, may make it impossible for us to manage the Reports we receive.

We remind you that you can still make use of the option of anonymity, bearing in mind that anonymous Reports will be evaluated by the Company only in cases in which they provide circumstantial and concordant evidence such as to ensure that the recipient is provided with the fullest possible information regarding the specific fact or behavior that is the subject of the Report.

4. **Categories of processed data and methods of treatment**

CATEGORIES OF PROCESSED DATA

The data processed by the owner in the activities related to the management of the report are of a common nature and refer to personal data and / or contact details strictly necessary to verify the validity of the report.

According to the principle of minimization will be processed only the personal data necessary to meet the request for reporting.

Special categories¹ of personal data and judicial data², if not relevant to the case of the report, should not be included in the report by the reporter. In any case, if they are present, the Company will not process them, except in cases where the processing is necessary for the establishment, exercise or defense of legal claims and is authorized by law or by an order of the Authority for the protection of personal data or otherwise by order of the Public Authority.

MODALITIES OF TREATMENT

The processing of the Data for the above-mentioned purposes will take place by computer and manual means, according to logical criteria compatible and functional to the purposes for which your Data have been collected, in compliance with the rules of confidentiality and security provided for by the law and internal company regulations and with the use of security measures aimed at guaranteeing the confidentiality of the interested party to whom the Data refer, and at avoiding undue access by third parties or unauthorized personnel.

In particular, your Data will be processed by means of their comparison, classification and calculation, as well as through the production of lists or lists.

Your Data shall be processed by the persons in charge of the relevant corporate functions, specifically instructed and authorized by the Data Controller pursuant to article 29 of the Regulation, in particular by the Head of the Audit Function of the Company who shall forward the Report to the Supervisory Body or to the Contact Person for the Anti-corruption Measures or to the Standing Committee for the Code of Ethics in consideration of the relevant scope of competence with respect to the contents of the Report itself.

5. **Categories of recipients of the Data**

Your Data, or some of them, may be communicated to the persons or entities that for this purpose may carry out processing operations on behalf of the Company or to which the law or secondary regulations recognize the right to access said Data, for example, for the first case, Consultants (Legal Firms, etc.), in compliance with the principles of proportionality and non excess, and for the second case, Institutions and/or Public Authorities, Judicial Authorities, Police Bodies for the fulfilment of

¹ Article 9 (1) of the GDPR considers "personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as dealing with genetic data, biometric data intended to uniquely identify a natural person, data concerning a person's health or sex life or sexual orientation" as special data.

² Article 10 of the GDPR considers personal data that relates to criminal convictions and offenses or related security measures to be judicial data.

obligations provided for by law. These subjects may operate as data processors pursuant to art. 28 of the Regulation or as autonomous data controllers and in this case they will provide appropriate information. In particular, DigitalPA s.r.l., independent supplier of the IT platform used by Rai Way for the management of the Reports, has been appointed Data Processor on behalf of RAI WAY and has implemented adequate security and confidentiality measures with regard to the aforementioned platform.

The Company will make available, upon request, the list of appointed data processors.

6. Transfer of Data to a Third Country

Your Data will not be transferred abroad.

7. Period of Data Retention

Personal Data processed in the context of a Whistleblowing procedure are deleted or anonymized within two months of the completion of the verification of the facts set out in the Whistleblowing, unless their further processing is necessary for one or more of the following purposes (i) resolution of pre-litigation and/or litigation initiated before the expiry of the retention period; (ii) to follow up possible investigations/inspections by internal control functions and/or external authorities initiated before the expiry of the retention period; (iii) to follow up requests from Italian and/or foreign public authorities received/notified to RAI WAY before the expiry of the retention period. In case of application of one or more of the aforementioned hypotheses of suspension of the irreversible deletion/anonymization process of personal data, the right of the Data Controller to restrict access to the identifying data of the reporter remains unaffected, pursuant to and for the purposes of Article 2-undecies, first paragraph letter f) of Legislative Decree 196/2003, as amended by Legislative Decree 101/2018.

8. Rights of the interested parties

The GDPR pursuant to Articles 15 to 22, and in the cases provided for, grants you the exercise of specific rights:

- a) Right of access to your Data, and in particular to information regarding the purposes of processing, the categories of Data processed, the recipients or categories of recipients to whom such data have been or will be communicated and the guarantee of the rights of the data subject;
- b) Right to request from the Data Controller the rectification, correction and/or integration of your Data or the limitation of the processing of the same;
- c) Right to obtain, without undue delay, the cancellation, transformation into anonymous form or blocking of your Data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed;
- d) Following the exercise of the rights referred to in paragraphs b) and c) above, the right to receive notification in case of rectification or erasure of your Data or limitation of processing;
- e) Right to oppose, in whole or in part, for legitimate reasons, the processing of your Data, even if pertinent to the purpose of collection and processing for the purposes provided for by law.

To exercise these rights you can contact the Data Controller, sending a registered letter with return receipt to the address indicated or an e-mail to tutelaprivacy@raiway.it.

Finally, we remind you that you have the right to lodge a complaint with the Guarantor Authority if

you believe that the rights indicated here have not been recognized.

Pursuant to and for the purposes of Article 2-undecies first paragraph letter f) of Legislative Decree 196/2003 as amended by Legislative Decree 101/2018 and in implementation of Article 23 of the GDPR), the above rights (Art. 15 to 22 of the Regulations) may not be exercised by the Reported Subjects, or their exercise may be delayed or limited, if the exercise of such rights may result in actual and concrete prejudice to the confidentiality of the identity of the employee who reports pursuant to Law No. 179 of 30 November 2017 the unlawful act of which he/she has become aware by reason of his/her work.

The Reported Person shall receive reasoned notice without delay from the Holder of the limitation, delay or exclusion of the exercise of his/her right, unless the notice would undermine the very purpose of the limitation. The person reported may also exercise their rights through the Guarantor in the manner provided for in Article 160 of the Privacy Code. In this case, the Guarantor shall inform the person concerned that it has carried out all the necessary checks or has carried out a review, as well as the right of the person concerned to file a judicial appeal.