

This information is intended for the authors of reports, for those who assist the whistleblower in the process (so-called facilitators), and for the persons to whom the informational content of the report may refer to as reported or involved parties in various ways in the reported events.

For this purpose, Abiogen Pharma S.p.A., as the data controller, informs, in accordance with Articles 13 and 14 of the General Data Protection Regulation (EU) 2016/679 (hereinafter also referred to as "GDPR"), that the personal data acquired within the framework of the report management procedure will be processed in the following ways and for the following purposes.

Data Controller and DPO contact details	<p>The data controller is Abiogen Pharma S.p.A., at Via Antonio Meucci 36- 56121 Pisa (PI).</p> <p>The Data Protection Officer is Lawyer Valeria Macchia, the office is in Livorno, at Piazza Grande No. 38. The DPO contact details are as follows: dpo@pec.abiogen.it</p>
Types of personal data processed	<p>The following types of personal data may be subject to processing:</p> <ul style="list-style-type: none">– the identity and the contact details of the whistleblower;– identity of the persons involved in the reporting, information and data relating the reported event, including any personal data related to special categories or criminal convictions and offenses;– any other information related to the whistleblower, individuals involved in the report, or any other third parties that the whistleblower chooses to share to better describe the suspected breach;– identity and contact details, as well as access account data for the computer platform used by individuals responsible for managing the reports.
Origin of the data and nature of the provision	<p>The personal data processed are those provided by the whistleblower and those possibly collected independently during the investigative activities, necessary to verify the circumstances subject to the report.</p> <p>The provision of data is necessary and functional to the management of the reports received in the forms and methods described in the Whistleblowing Procedure.</p>
Purpose of the processing	<p>Personal data will be collected and processed for purposes related to the management of reports of breaches concerning: i) national and European legislation related to sectors and interests relevant to the European Union; ii) breaches relevant under Legislative Decree 231/2001 or breaches of organizational models; iii) additional civil, administrative, and accounting offenses according to the national legislation, using the methods and tools described in the <i>Whistleblowing Procedure</i>.</p>
Legal basis	<p>Data Processing arises from the need to apply the provisions of Legislative Decree No. 24/2023, as well as those provided for by the Model of Organization, Management and Control in accordance with Legislative Decree No. 231/2001 and the code of ethical conduct.</p>
Retention period	<p>The reports and the related documentation are retained for the time necessary for the processing of the report, however, not later than five years from the date of communication of the final result of the reporting procedure, in compliance with the confidentiality obligations of the whistleblower.</p> <p>Personal data that is clearly not useful for the assessment of the report will be promptly deleted.</p>

Personal data recipients

Personal data will be processed by the Reporting Management Structure (SGS), identified in the company Si.Qu.Am. S.r.l., at Via Marco Polo 72, Bientina (PI), as the data processor. In accordance with the current regulations and the reporting management procedure adopted by Abiogen Pharma S.p.A., the Data Processor is required to guarantee the confidentiality of the whistleblower's identity and the information they have become aware of.

The identity of the whistleblower or any other information from which such identity can be directly or indirectly inferred may only be disclosed with the express consent of the whistleblower. Where necessary for investigative activities, some information related to the report may be processed by other functions of the companies to which specific instructions have been provided, such as the Supervisory Body under Legislative Decree 231/2001 (where the report pertains to matters covered within the 231 Model adopted by the Company) and the CEO of the Company or the Board of Statutory Auditors in the case of conflicts of interest.

The IT platform for managing reports is run by Option Data Solutions S.r.l., at Piazza Risorgimento 7, Milan (MI), designated as the data processor. The encryption system of the platform does not allow the data processor to access the identity of the whistleblower or the content of the reports.

Finally, in the cases provided for by regulations, some data may be transmitted to the Judicial Authority and/or the competent Authorities.

Regarding the same data, data subjects can exercise, in the cases provided for, the rights as in CHAPTER III of the GDPR.

In particular, the whistleblower can exercise the right to access their own data, to correct or complete it, to delete it, and to limit its processing using the same methods used to submit the report.

Furthermore, in accordance with Art. 77 of the GDPR, the whistleblower has the right to lodge a complaint with the Data Protection Authority if they believe that the processing violates the aforementioned GDPR.

Data subject's rights

Please note that the exercise of the aforementioned rights by other individuals concerned, such as the reported party or other involved persons, may be delayed, limited, or excluded if such exercise could result in an actual and concrete prejudice to the confidentiality of the whistleblower's identity, as provided for in Art. 2-undecies, letter f of the Privacy Code (in implementation of Art. 23 of the GDPR). In such cases, the aforementioned rights can be exercised through the Data Protection Authority, following the procedures outlined in Art. 160 of the Privacy Code.