

This information is intended for use by whistle-blowers, the natural persons assisting the reporting person in the reporting process and, finally, the natural persons to whom the information contained in the report may refer as individuals reported or involved in various ways in the events reported.

To this end, Abiogen Pharma S.p.A., as the data controller, informs pursuant to art. 13 and 14 of the General Data Protection Regulation EU 2016/679 (hereinafter also only "GDPR"), that the personal data acquired within the framework of the procedures for managing reports will be processed in the manner and for the following purposes.

**Data controller and  
contact details of  
the DPO**

The Data Controller is Abiogen Pharma S.p.A. via Antonio Meucci 36- 56121 Pisa (PI).

The Data Protection Officer is the Avv. Valeria Macchia, with studio in Livorno, Piazza Grande n.38. The contact details of the DPO are as follows: dpo@pec.abiogen.it

**Types of data  
processed**

The following types of personal data may be processed:

- identification and contact details of the person issuing the alert;
- identification data of the persons involved in the alert, information and data relating to the violations reported, including any personal data relating to particular categories or related to criminal convictions and offences;
- any other information relating to the reporting person, persons involved in the reporting to any other third parties, which the reporting person decides to share in order to better describe the suspected breach;
- identification data, contact and account access to the information platform of the persons in charge of handling alerts.

**Origin of the data  
and nature of the  
conferment**

The personal data subject to processing are those provided by the reporting person and those that may be collected autonomously in the course of the investigation activities, necessary to ascertain the circumstances subject to the reporting.

The provision of data is necessary and functional for the management of reports received in the forms and procedures described in the Procedure for the management of reports (whistleblowing) and in the Procedure for reporting gender equality.

**Purpose of the  
processing**

Personal data will be collected and processed for purposes related to the handling of infringement reports concerning: i) national and European legislation relating to areas and interests relevant to the Union; ii) material breaches within the meaning of Regulation 231/2001 or violations of organisational models; iii) additional civil, administrative and accounting offences covered by national law; iv) Violations of the principles of Gender Equality with the methods and tools described in the Procedure for handling reports (whistleblowing) and in the Procedure for reporting gender equality.

**Legal basis**

The processing of personal data, as regards the handling of whistleblowing reports, results from the need to apply the provisions of D. Lgs. 24/2023 as well as those provided for by the organization and management model pursuant to D.lgs. 231/2001 and the code of ethics. The processing of data for the purpose of managing reports relating to gender equality, instead, it results from the requirement of the Owner to respect the principles of gender equality and equal opportunities within the organization in accordance with the Policy for Gender Equality, current regulations (including D.Lgs. 198/2006 "Equal Opportunity Code") and the reference practice UNI/PdR 125:2022.

**Retention time**

The alerts and related documentation shall be kept for as long as is necessary to process the alert, but no longer than five years from the date of communication of the final outcome of the alert procedure, respecting the confidentiality obligations of the reporting person.

Personal data that is clearly not useful for the evaluation of the report will be deleted immediately.

Personal data may be processed by the Reporting Management Structure (SGS), located in the company Si.Qu.Am. S.r.l., based in Via Marco Polo 72 Bientina (PI), as the data controller. In accordance with the current legislation on the subject and the procedures for handling reports adopted by Abiogen Pharma S.p.A., the Data Controller is obliged to guarantee the confidentiality of the identity of the reporting person and the information he has come to know about.

The IT platform for managing reports is managed by Option Data Solutions S.r.l., based in Piazza Risorgimento 7, Milan (MI), designated as the controller. The encryption system of the platform does not allow access to the identity of the reporting person or the content of reports by the controller.

**Recipients of personal data**

The identity of the reporting person or any other information from which such identity can be derived directly or indirectly may only be disclosed with the express consent of the same reporting person. Where necessary for requirements related to investigative activities, some information related to the report may be processed by other functions of the Companies to which specific instructions have been given, such as Supervisory Body ex D.lgs. 231/2001 (if the report is related to the aspects covered in Model 231 adopted by the Company), Steering Committee for Gender Equality Delegate (if the report is related to issues relating to gender equality).

Finally, some data may be transmitted, in the cases provided by the legislation, to the judicial authority and/ or the competent authorities.

In relation to the data itself, the Data Subjects may exercise, in the cases provided for, the rights set out in CHAPTER III of the EU Regulation 2016/679 (GDPR).

In particular, the reporting person may exercise the right of access to his or her data, rectification or supplementation, deletion and restriction of processing in the same way as he or she has reported

**Rights of the Data Subject**

The informer, pursuant to art. 77 of the GDPR, you also have the right to file a complaint with the Data Protection Authority if you believe that the processing violates said Regulation.

Please note that the exercise of these rights by other persons concerned, such as the reporting person or other persons involved, may be delayed, limited or excluded where such exercise may result in an actual and concrete prejudice to the confidentiality of the identity of the informer as provided for by Article 2-undecies, lett. f of the Privacy Code (in implementation of Article 23 of GDPR). In such cases, the aforementioned rights may be exercised through the Guarantor for the protection of personal data, according to the procedures set out in article 160 of the Privacy Code.