

PRIVACY NOTICE - WHISTLEBLOWING

Treatment holder

Pursuant to Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter “GDPR”), Elettromeccanica Galli Italo S.p.A., with registered office at Viale Prealpi 31, 22036 Erba (CO), Italy, email address privacy.EIE.ITALY@eiffage.com (hereinafter also referred to as the “Company” or the “Data Controller”), in its capacity as Data Controller, processes your personal data in the context of the management of reports concerning violations of national or European Union regulatory provisions that harm the public interest or the integrity of the private entity, received through the internal reporting channel made available by the Company.

Purpose of processing and legal basis

The Company makes a Group platform available to whistleblowers through which reports may be submitted. The personal data provided through the platform made available to you and accessible via the Company’s website are processed as follows:

- 1) for the management of internal reports concerning alleged violations, namely behaviours, acts or omissions that harm the public interest or the integrity of the private entity, as defined by Article 2, paragraph 1, letter (a) of Legislative Decree No. 24/2023, of which the Reporting Person became aware in the context of their relationship with the Data Controller. The personal data processed, in particular, include those contained in the internal report and/or in any acts and documents attached thereto, and may relate both to the Reporting Person and to the individuals involved (Reported Person(s)), where such data are provided.
- 2) for the performance of the necessary investigative activities aimed at verifying the validity of the reported facts, as well as, where applicable, for the adoption of appropriate corrective measures and the initiation of suitable disciplinary and/or judicial actions against those responsible for the violations. The legal basis for the processing of personal data is the fulfilment of a legal obligation to which the Data Controller is subject (Article 6(1)(c) of the GDPR), as specifically provided for by Legislative Decree No. 165/2001, Legislative Decree No. 231/2001, Law No. 179/2017 and Legislative Decree No. 24/2023; the processing may also involve special categories of personal data and judicial data included in the reports.

Where necessary for the management of the report, you will be asked to provide your explicit consent to the disclosure of your identity to persons other than those authorised to receive and/or follow up on the reports, as further specified in the section “Categories of Data Recipients” set out below. Please note that the reporting form may also be completed in a fully anonymous manner, without it being possible in any way to trace the identity of the Reporting Person.

Categories of data recipients

The personal data provided will be processed by:

- By the person responsible for the local whistleblowing system. Your data may also be processed by third parties external to the Company, appointed by the Data Controller as Data Processors pursuant to Article 28 of the GDPR. The person responsible for the local whistleblowing system, on the other hand, is an internal individual specifically authorised by the Company. The personal data will not be subject to disclosure; however, where applicable, they may be transmitted to the Judicial Authority. None of the data collected will be transferred to third countries, understood as countries outside the European Economic Area (EEA). Where the report is external and is submitted, as

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provided for by Articles 6 and 7 of Legislative Decree No. 24/2023, to the National Anti-Corruption Authority (ANAC), information regarding the processing of personal data will be provided by the Authority itself through the appropriate channels.

Retention time criteria

The personal data included in the reports will be retained for the time strictly necessary to process the report and, in any event, for no longer than five years from the date on which the final outcome of the reporting procedure is communicated, in compliance with the confidentiality obligations set out in Article 12 of Legislative Decree No. 24/2023 and with the principle laid down in Article 5(1)(e) of the GDPR and Article 3(1)(e) of Legislative Decree No. 51 of 2018. After the maximum period of five years has elapsed, the information relating to the report may be retained by the Company solely for the purpose of safeguarding and preserving its right of defence and, where required, of providing evidence of the proper management of the reports received. In such cases, the personal data will be anonymised.

Methods of processing of personal data

The processing of personal data will be carried out exclusively by authorised personnel and/or by entities specifically appointed as Data Processors, using methods designed to ensure the confidentiality of the identity of the Reporting Person (where disclosed by the same) and of the content of the internal reports and the related documentation, through the adoption of appropriate technical and organisational measures. In order to ensure the confidentiality of the Reporting Person throughout the entire duration of the management of the internal report, their identity will be known only to individuals expressly authorised to manage the reports and will be protected in any subsequent context following the report. Accordingly, the identity of the Reporting Person may be disclosed solely with their explicit consent.

Provision of personal data

The provision of the Reporting Person's personal data is optional. However, failure to provide such data may adversely affect the handling of the report. Anonymous reports will, in fact, be taken into consideration only if they are sufficiently detailed so as to clearly set out facts and situations connected to specific and identifiable contexts.

Rights of the data subjects

The GDPR grants the rights set out in Articles 15 to 22 of the GDPR, which, in the present context, may be exercised within the limits provided for by Article 2-undecies, paragraph 3, of Legislative Decree No. 196/2003, by contacting the Data Controller using the contact details indicated above in the section "Data Controller". In particular, the above-mentioned rights may not be exercised by submitting a request to the Data Controller, nor by lodging a complaint pursuant to Article 77 of the GDPR with the Supervisory Authority, where the exercise of such rights could result in an actual and concrete prejudice to the confidentiality of the identity of the person who reports violations of which they became aware in the context of their employment relationship or the functions performed. In any event, the exercise of the aforementioned rights may be deferred, restricted or excluded by means of a reasoned communication provided without undue delay by the Data Controller, unless such communication could compromise the purpose of the restriction, for the time and to the extent that this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the Reporting Person, the Reported Person or other individuals involved in the reports. In such cases, pursuant to Article 2-undecies, paragraph 3, of Legislative Decree No. 196/2003, the Data Subject may exercise the aforementioned rights through the Supervisory Authority, in accordance with the procedures set out in Article 160 of the same Legislative Decree. Where it is considered that the

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processing of personal data is carried out in breach of the provisions of the GDPR, a complaint may be lodged with the Supervisory Authority, as provided for by Article 77 of the GDPR (without prejudice to the limitations on the exercise of rights set out above and provided for by Article 2-undecies, paragraph 3, of Legislative Decree No. 196/2003), or the competent judicial authorities may be seized (Article 79 of the GDPR).

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