



WHISTLEBLOWING PRIVACY NOTICE

231_MOD 12.01

Rev. 02 Date 09/07/2026

Privacy Notice

*regarding the processing of personal data of individuals who submit reports through
My Whistleblowing or via the internal channels provided by Taka Srl.*



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PRIVACY POLICY

Privacy Notice

Pursuant to Article 13 of Legislative Decree No. 196/2003 of the Personal Data Protection Code (hereinafter, also, the "Privacy Code") and pursuant to Article 13 of European Regulation No. 679/2016 (hereinafter, also, the "GDPR"), we provide you with the following notice.

DATA CONTROLLER

The data controller is Taka Srl, located at Via dell'Industria No. 4, Pianezze, email: privacy@taka.it.

LOCATION OF DATA PROCESSING

The processing activities take place in Italy, and there is no transfer or dissemination of data abroad or to non-EU countries. No data is communicated or disseminated, except for statistical purposes, and in any case, in an anonymous and/or aggregated form.

PURPOSE OF DATA PROCESSING

The personal data you provide are used solely to manage the Whistleblowing report you have submitted.

PROCESSED DATA

The personal data processed are exclusively:

- First Name (if provided)
- Last Name (if provided)
- Email Address (if provided)

LEGAL BASIS FOR PROCESSING

The legal basis for processing your personal data is the legal obligation arising from the provisions of Article 6 of Legislative Decree No. 231/2001, as amended by Law No. 179/2017, containing "Provisions for the protection of whistleblowers of crimes or irregularities they have become aware of in the context of a public or private employment relationship." and by Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (the Whistleblowing Directive), as implemented into Italian law by Legislative Decree No. 24 of 10 March 2023.

RETENTION PERIOD

The personal data you provide will be deleted within 5 years from their storage, or 10 years if the report results in a disciplinary measure or the initiation of judicial proceedings.

WHOM WE SHARE YOUR DATA WITH

Your personal data may be accessed by employees responsible for investigating Whistleblowing reports and members of the Supervisory Body pursuant to Legislative Decree 231/2001. Furthermore, since Whistleblowing reports may be submitted through the My Whistleblowing



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software, the provider of this application may also have access to your personal data, appointed as the data processor in accordance with Article 28 of the GDPR. It is understood that, in line with the principle of protecting the confidentiality of the whistleblower under Law 179/2017, the sharing of your personal data will be limited to the minimum necessary to ensure your confidentiality.

METHODS OF PROCESSING

Personal data is processed both through automated tools and manual tools for the purposes outlined above. Specific security measures are taken to prevent data loss, unlawful or incorrect use, and unauthorized access.

RIGHTS OF THE DATA SUBJECTS

Under certain conditions, you have the right to exercise the rights provided by Articles 7, 8, 9, and 10 of the Privacy Code and Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR, and in particular, to request:

- access to your personal data,
- a copy of the personal data you have provided to us (i.e. portability),
- rectification of the data in our possession,
- deletion of any data for which we no longer have any legal basis for processing,
- opposition to processing where required by applicable law,
- withdrawal of your consent, if the processing is based on consent,
- limitation of the way we process your personal data, within the limits provided by data protection laws.

The exercise of these rights is subject to certain exceptions aimed at safeguarding public interest (for example, the prevention or identification of crimes) and our interests (for example, maintaining professional secrecy). If you exercise any of the aforementioned rights, it will be our responsibility to verify that you are authorized to do so, and we will respond, as a rule, within one month.

Anyone with doubts regarding the compliance with the privacy protection policy adopted by Taka Srl, its application, the accuracy of their personal data, or the use of the collected information can contact us by email at: privacy@taka.it.

However, if you wish, you may submit your complaints or reports, pursuant to Article 77 of the GDPR, to the relevant data protection authority, using the appropriate contact details:

Italian Data Protection Authority Piazza di Monte Citorio No. 121 00186 ROMA Fax: (+39) 06.69677.3785 Phone: (+39) 06.696771 Email: garante@gpdp.it Certified Email: protocollo@pec.gpdp.it