

PRIVACY POLICY – WHISTLEBLOWING

This privacy policy is provided pursuant to Article 13 of the EU Regulation 2016/679 (hereinafter “**GDPR**”) with reference to the use of the whistleblowing system (hereinafter “**System**”) by the Data Subject (hereinafter also “**Whistleblower**”) and the related assessment of their justification, pursuant to Legislative Decree No. 24 of 10 March 2023, implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019.

1. DATA CONTROLLER

The Data Controller for the processing of Personal Data (hereinafter “Data”) acquired through reports relating exclusively to the TEXA Company is TEXA S.p.A., with registered office at Via 1 Maggio 9, 31050 Monastier di Treviso (TV), VAT No. 02413550266, (hereinafter “**TEXA**” or the “**Data Controller**”). The Data Controller has appointed a Data Protection Officer, who can be contacted via the following e-mail address: dpo@texa.com.

If the report involves:

- one or more Companies in the TEXA Group, of which a complete list is available at the following web address: <https://www.texa.com/company/branches/>
- the TEXA SECURITY S.r.l. Company with registered office in Via 1 Maggio n. 9, 31050 Monastier di Treviso (TV), tax code 04057630263,
- the TEXA OPUSAREA S.r.l. Company with registered office in Via 1 Maggio n. 9, 31050 Monastier di Treviso (TV), tax code 04933740260,

(hereinafter “**Company**” or “**Companies**”), said Company(ies) and TEXA shall process the personal data required to manage all phases of the whistleblowing process as Joint Data Controllers pursuant to Article 26 of the GDPR (hereinafter “**Joint Controllers**”) on the basis of a specific joint controllership agreement aimed at regulating their respective tasks and responsibilities (hereinafter “**Joint Controller Agreement**”).

To exercise their rights and for any other matter relating to Data processing, the Data Subject may send a written request to the e-mail address: privacy@texa.com.

2. CATEGORY OF DATA PROCESSED, NATURE OF PROVISION, AND PURPOSE OF PROCESSING

The Personal Data processed encompass information voluntarily supplied by the Whistleblower concerning alleged unlawful conduct they have become aware of due to their employment or duties.

The Data Controller manages this data to conduct essential investigative activities, validate the reported incident, and implement ensuing measures. Additionally, it serves the purpose of safeguarding rights during legal, administrative, or extrajudicial proceedings and dispute resolutions related to the report.

Providing this data is optional, as anonymous whistleblowing is also an option. However, if provided, data is processed with strict confidentiality, in accordance with applicable legal requirements.

This data processing is legally grounded in the necessity to fulfil an obligation imposed on each Data Controller (Article 6, paragraph 1(c), Article 9, paragraph 2(b), and Article 10 of the GDPR) and the Company's legitimate interest in protecting its rights (Article 6, paragraph 1(f) of the GDPR).

3. DATA PROCESSING METHODS AND STORAGE DURATION

Data processing will adhere to principles of accuracy, legality, and transparency. It may involve both paper and digital means, utilising methods and procedures essential for the stated purposes.

Notably, data will primarily be processed through the whistleblowing portal, **TEXA Integrity Line**, ensuring the complete confidentiality of the whistleblower's identity, individuals mentioned in the report, report content, and related documentation at all stages.

TEXA S.p.A.

Registered office: Via 1 Maggio, 9 - 31050 Monastier di Treviso - ITALY
 Plant entrance: Via Vallio, 15 - 31050 Monastier di Treviso - ITALY
 Tax no. - Company Register of Treviso and Belluno no. – VAT registration no.: 02413550266
 Share capital 10.000.000 € i.v. - R.E.A. N. TV - 208102
 Single-member company subject to management and coordination by Opera Holding S.p.A. with sole shareholder.
 Legal Representative: Bruno Vianello
 Phone +39 0422 79 13 11 - Fax +39 0422 79 13 00 - www.texa.com

Rev. 01 of 28/06/2024



Reports and their associated documentation will be retained for the duration necessary for report processing, not exceeding five years from the date of the final outcome communication of the whistleblowing procedure.

4. DISCLOSURE OF DATA TO THIRD PARTIES - DATA RECIPIENTS

Access to the Personal Data included in Reports is limited to the Ethics Committee, a body specifically designated by TEXA to handle whistleblowing, composed of internal and external members who are autonomous and duly trained, instructed and authorised to process, or if external persons appointed as Data Processors pursuant to art. 28 of the GDPR.

To fulfil the objectives outlined in this Policy, the Data may be shared with:

- professionals engaged by the Controller or the Companies to assist in managing specific reports or disputes (e.g., consultants or law firms).
- third parties when required by law (e.g., judicial authorities).
- service providers (e.g., IT services) who will process the data as Data Processors and will be appointed in accordance with Article 28 of the GDPR. The updated list of Data Processors is available from the Data Controller.
- other internal figures within TEXA or the other Companies to the extent necessary for the handling of the report. All persons authorised to view the report are expressly bound by the obligation of confidentiality.

Under no circumstances will personal data be shared.

5. TRANSFER OF PERSONAL DATA TO FOREIGN COUNTRIES OR INTERNATIONAL ORGANISATIONS

No personal data will be transferred to third countries (outside the EU) or international organisations. If the need arises to transfer data to external parties located beyond the European Economic Area for process-related reasons, such a transfer will only occur under specific conditions. These conditions include confirmation by the European Commission of an adequate level of data protection in the third country or the presence of sufficient data protection safeguards, such as standard EU contractual clauses for data transfers to third countries.

6. RIGHTS OF DATA SUBJECTS

The GDPR (Articles 12 and 15-22) affirms the rights of all Data Subjects. These rights include access to personal data related to them and information about its processing. They have the ability to rectify and supplement inaccurate or incomplete data. Furthermore, when specific legal conditions are met, Data Subjects can request the erasure of data, restrict its processing, exercise data portability, object to processing, and opt out of decisions solely based on automated processes. If the Personal Data processing is based on their consent, the Data Subject has the right to withdraw their consent (without prejudice to the lawfulness of processing based on the consent expressed before the withdrawal). If the Data Subject believes their rights have been harmed, they may protect themselves forwarding a complaint to the Warrantor for the protection of Personal Data.

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