

SAATI

Information on the processing of personal data

WHISTLEBLOWING – CODE OF CONDUCT

EUROPEAN UNION

SAATI S.p.A. and the other European group companies as listed from time to time in **Annex 1** hereto (collectively “SAATI”), in their capacity as joint controllers, would like to inform you about the processing activities of your personal data (“Data”) which may be undertaken in the context of

- managing reports submitted in relation to the Code of Conduct adopted by SAATI through the reporting channels identified therein (including potential breaches thereof);
- managing reports submitted in relation to the local Whistleblowing Policies through the reporting channels identified therein, where adopted in accordance with the provisions of Directive (EU) 2019/1937 and the implementing legislation of the local Member State (“Whistleblowing Legislation”);

in accordance with the and Regulation (EU) 2016/679 and the local amending legislation of the Member State (“Privacy Legislation”).

This Information does not apply in the case of reports made through external channels or in the case of public disclosures as contemplated in the applicable local Whistleblowing Policies.

1. Data Controller

The joint data controllers are identified in **Annex 1** hereto.

2. Purposes of the processing and consequences in case of refusal to provide your personal data

SAATI had adopted

- a Code of Conduct, contemplating several reporting channels for any doubts, requests of support, notices of violation or suspected violation thereof; and
- in compliance with the Whistleblowing Regulations, local Whistleblowing Policies contemplating several reporting channels in order to allow the addresses of said policies to report serious irregularities as provided for in the Whistleblowing Regulations, in line with what is set out in the Whistleblowing Policies available on SAATI's website.

As part of the reporting management activities, SAATI processes Data for the sole purpose of enabling the verification of the report received and the adoption of appropriate measures in the event that as a result of the report a relevant violation is established.

The Data and information provided during the activities related to the report may concern

- (i) the name and contact details of the reporting person (unless the report is made anonymously);
- (ii) the identity, functions, and contact details of the persons involved in processing the reported events;
- (iii) the names and positions of those involved with the alleged perpetrator of the breach (Reported

- (iv) Person) or information enabling their identification (e.g., Facilitators); the names and positions of any other persons who can confirm the related events included in the report;
- (v) a description of the alleged violation and the circumstances of the case, including any reference to any documents or other items that may substantiate the reported events.

Only where relevant to the reported matter and only to the extent permitted by applicable law and/or the need to ascertain, exercise, or defend a legal claim may Data belonging to special categories (e.g., personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as processing of genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health or sex life or sexual orientation) be processed. If such Data are not relevant for reporting purposes or are otherwise irrelevant, they will be deleted promptly and will not be processed further.

The provision of Data is optional; however, in case of refusal or anonymous reporting, it will be more difficult or as the case maybe, it may not be possible to follow up on the activities related to the report.

3. Legal bases of the processing

SAATI will process the Data in full compliance with the provisions of current data protection regulations and in any case in line with local regulations, on the following various legal grounds:

- On the basis of compliance with **legal obligations** (Art. 6(1)(c) of the GDPR): to comply with relevant laws and regulatory requirements and to respond to lawful requests, judicial orders and legal proceedings.
- On the basis of **legitimate interests** (Art. 6(1)(f) of the GDPR): to achieve a legitimate interest based on an assessment of the interests of SAATI, the data subject, and other fundamental interests.
- On the basis of **consent** (Art. 6(1)(b) of the GDPR): the identity of the reporting person and any other information from which such identity may be inferred, directly or indirectly, may not be disclosed, without the express consent of the reporting person, to persons other than those responsible for receiving or following up the reports, who are expressly authorized to process such personal data. Express consent is also required while using the voice messaging channel, before documenting any meeting by means of recording device or by means of a minute.
- On the basis of performing **a task carried out in the public interest** or in the exercise of official authority vested in the data controller (within the meaning of Article 6(1)(e) of the GDPR).

The processing of Data relating to criminal offences on the breaches reported may only take place if necessary for the fulfilment of obligations under the applicable Whistleblowing Legislation (Article 10 of the GDPR).

4. Disclosure of your personal data to third parties

The Data is processed by employees, consultants, contractors and other authorized processing personnel, as well as third parties who may act as data processors or other data controllers.

Information collected through your reporting may be disclosed to external consultants, government authorities when necessary for the purpose of complying with legal requirements or in the course of legal action.

Reports are handled by employees, consultants, collaborators and other staff authorized to process them, as well as by third parties such as consultancy companies or external consultants for the performance of activities instrumental to the above purposes. These subjects will act, when acting

on behalf of SAATI, normally as data processors. The information collected through such Reports may be disclosed to external consultants or government authorities, when necessary to comply with legal requirements or in the course of legal proceedings.

5. Transfers of Personal Data outside the European Union.

SAATI may only transfer personal data to countries and international organizations that the European Commission has deemed suitable on the basis of an adequacy decision, or if the third country or organization provides adequate guarantees to ensure the same level of protection. Adequate guarantees may be provided by signing standard contractual clauses.

6. How Personal Data are processed

All reporting channels are designed and operated in a secure manner to prevent access to information by unauthorized persons and to ensure that the identity of the reporting person and other persons involved in the investigation remains confidential.

SAATI will ensure that the collection, processing and use of personal data will be carried out by specially instructed and trained staff in compliance with technical and organizational security measures to protect the integrity and confidentiality of the identity and personal data of the reporting person and of the other persons involved in the report.

The identity of the persons involved and those mentioned in the report is guaranteed, unless its disclosure is required by law, until the conclusion of the relevant proceedings.

7. Retention of Personal Data

The Data are retained by SAATI for the time strictly necessary to pursue the purposes for which the Data are collected and to comply with applicable legal obligations, in any event within the maximum retention period provided for by applicable laws.

In addition, the Data will be deleted or permanently anonymized upon achievement of the above purposes, unless SAATI is required to retain the data for a further period to fulfill legal obligations.

8. Your Rights

You may exercise at any time the rights set forth in Art. 15 et seq. of the GDPR (such as obtaining confirmation of the existence or non-existence of Data, verifying its content, origin, accuracy, requesting its integration, updating, rectification, deletion, anonymization, requesting data portability, restriction of processing, opposition to processing for legitimate reasons), by writing to the addressees referred to in **ANNEX 1**.

The exercise of your rights may, in any case, be delayed, limited or excluded by reasoned notice from SAATI (unless such notice would jeopardize the purpose of the limitation), for as long and to the extent that this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the data subject.

At any time you may submit a complaint to the competent authority as provided under Article 77 GDPR.

Latest revision: December 2023

ANNEX 1

Country	Data Controller [company and contact details, address, exercise of privacy rights]
Italy	<p>SAATI S.p.A. Via Milano 14, Appiano Gentile, 22070 Como, Italy privacy@saati.com</p>
Germany	<p>SAATI Deutschland GmbH Ostring 22, 46348 Raesfeld, Germany privacy@saati.com</p> <p>SPT Sales + Marketing GmbH Kurpfalzring 100A, 69123 Heidelberg, Germany privacy@saati.com</p> <p>CST Colour Scanner Technology GmbH Königsberger Straße 117, 47809, Krefeld, Germany privacy@saati.com</p>
France	<p>SAATI France S.A.S. 74 Route de Bapaume 80360 Sailly Saillisel, France privacy@saati.com</p>
Spain	<p>SAATI Serigrafía Ibérica S.A.U. Pol. Ind. El Mijares, C/ Industria, nº 13, 12550 Almazora, Castellón, Spain privacy@saati.com</p>