

Annex 1

INFORMATION ACT Articles 13 and 14 EU Regulation 679/16 on the processing of data in the context of whistleblowing - whistleblowing

In compliance with EU Regulation 679/2016 "General Data Protection Regulation" (hereinafter "GDPR") and Legislative Decree 10.03.2023 No. 24, ZAPI s.p.a. discloses the following information regarding the data processed as part of reports of unlawful conduct (so-called "whistleblowing") through its reporting channels.

1. Data Controller

1.1 The data controller is ZAPI s.p.a., in the person of its legal representative *pro tempore*, P.IVA 01143740288, with registered office in Via Terza Strada n. 12 - ZI, 35026 Conselve (PD) Tel. +39 049 9597700 e-mail info@zapispa.com - PEC zapi@pec.it, as the data controller (hereinafter "ZAPI" or the "Data Controller").

2. Categories of personal data, purpose and legal basis for processing

2.1 As part of the Reports may be processed:

- i. Common personal data such as biographical data, contact data, professional qualification data;
- ii. special data in accordance with Art. 9 GDPR;
- iii. Data related to criminal convictions and offenses under Article 10 GDPR

contained in the Reports and attached documents and relating to the Reporting Party, the Reporting Party, the facilitators and other persons affected by the Report, exclusively to receive and manage the Reports in accordance with the "Procedure for the Management of Reports of Violations -whistleblowing". Once the Report has been acquired, ZAPI will proceed with the relevant investigation and, if appropriate, with the actions deemed most appropriate, including disciplinary/judicial actions against the wrongdoer.

The legal basis for the processing of personal data is identified:

- i. for "common" data, from the fulfillment of legal obligations incumbent on the owner (art. 6, par. 1, letter c) GDPR - Legislative Decree 24/2023);
- ii. for special data under Art. 9 GDPR, by the need to fulfill the obligations and exercise the rights of the owner or the data subject in the field of labor law (Art. 9(2)(b) GDPR);
- iii. for data relating to convictions ex art. 10 GDPR, to fulfill a legal obligation incumbent on the owner (art. 10 GDPR - 2 octies Legislative Decree 196/2003).

2.2 Data may also be processed for the defense of the Controller's rights. In this case, the legal basis for processing is the pursuit of the legitimate interest of the Controller (Art. 6(1)(f) GDPR - Art. 9(2)(f) GDPR).

2.3 In the case of a Report made orally during a meeting with the Manager, the Manager, with the consent of the Reporting Party, which will be collected and documented at the time, may proceed to verbalize it.

2.4 Reports may not be used beyond what is necessary to adequately follow up on them.

3. Methods of processing personal data

3.1 Processing operations will be carried out using paper and computer tools in accordance with the principles of lawfulness, fairness, transparency, relevance, accuracy, purpose limitation and minimization. Data that are manifestly not useful for processing a specific report are not collected or, if accidentally collected, are deleted immediately.

The data will be protected from the risks of destruction, modification, deletion and unauthorized access by appropriate logical, physical and organizational security measures.

The data may be processed, for the purposes of point 2 only, exclusively by the Reporting Manager, as well as by any other individuals involved in the investigation, specially authorized and instructed in compliance with the protection of the confidentiality of the identity of the reporter in accordance with the data protection legislation, according to the specific role, pursuant to Articles 28 and 29 GDPR.

3.2 There are no automated profiling processes.

4. Sources of personal data

4.1 Personal data may be learned as part of the Reporting or Investigation.

5. Nature of data provision and consequences of failure to provide data

5.1 In order for a report to qualify as "whistleblowing," it is mandatory that the Whistleblower provide his or her first and last name. Otherwise, or in case of indication of pseudonyms or nick names, the report will be considered anonymous and ZAPI may treat the report, if circumstantiated and punctual, as an ordinary report. In this case, however, the protection measures provided for in Legislative Decree 24/2023 will not be applied, unless the Whistleblower is then identified.

6. Period of retention of personal data

6.1 Reports and related documentation will be retained for the period necessary to process the reports and in any case no longer than five years from the communication of the final outcome of the reporting procedure, subject to confidentiality obligations, after which the data will be deleted.

7. Recipients of the data

7.1 Personal data may be communicated to the Reporting Manager and any other authorized parties whose communication is necessary for the management of the investigation. In the event that it is necessary to involve third parties in the conduct of the investigation, the Manager will obscure all personal data and any other reference that would make it possible to trace the identity of the Reporting Party and other protected subjects. The identity of the Whistleblower may not be disclosed, without his or her express consent, to persons other than those responsible for receiving or following up the Report. The personal data collected as a result of the Report may be disclosed, where appropriate, to the Judicial Authority and the National Anti-Corruption Authority, subject to the confidentiality obligations provided by law. These entities operate as autonomous data controllers.

7.2 Personal data will not be disseminated or transferred to third countries or international organizations.

8. Rights of the Interested Party

8.1 The rights referred to in Articles 15 -22 GDPR (right of access, rectification, cancellation, restriction of processing and objection to processing) may be exercised by contacting ZAPI s.p.a. by submitting a written request to the Reporting Manager at the e-mail address odvzapigroup@outlook.it or by registered mail with return receipt to the address of the SB at Gestioni Ambientali S.r.l. - via della Croce Rossa, 42 - 35129 Padua. It is represented that the right to data portability under Article 20 GDPR is not exercisable due to lack of legal prerequisites.

8.2 Pursuant to the provisions of Article 11 undecies of Legislative Decree No. 196/2003, the person involved or the person mentioned in the Report, with reference to their personal data processed in the context of the Report, public disclosure or complaint, may not exercise, for the time and to the extent that this constitutes a necessary and proportionate measure - the rights recognized by the GDPR above because the exercise of such rights could result in an actual and concrete prejudice to the protection of the confidentiality of the identity of the Reporting Person. In such cases, the Reported Person or the person mentioned in the report is also precluded from the possibility, where they believe that the processing that concerns them violates the aforementioned rights, of contacting ZAPI and, in the absence of a response, of lodging a complaint with the Data Protection Authority.