

**NEO
DECOR
TECH**

Decors and surfaces
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WHISTLEBLOWING

Disclosure pursuant to Articles 13 and 14 of EU Regulation
2016/679

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This disclosure is provided pursuant to Articles 13 and 14 of EU Regulation 2016/679, which addresses the protection of individuals with regard to the processing of personal data and the free movement of such data (hereinafter also Regulation).

Data Controller

The Data Controller is Neodecortech S.p.A., with registered office in Via Provinciale 2, 24040 Filago (BG).

Purposes of the processing

The Controller will process your Personal Data to manage reports of breaches pursuant to Legislative Decree 24/2023. To manage the report and safeguard your protection when incidents of crimes or irregularities that you became aware of as part of your relationship with the Controller are reported. Specifically, your data will be processed to disclose information about you, from which your identity can be inferred directly or indirectly, to persons other than those authorized to receive or follow up on reports. This includes situations where knowledge of the whistleblower's identity is essential for the defense of the accused in any disciplinary proceedings.

Nature of personal data processed

In pursuit of the specified purposes, the Controller may access the data contained in the report. The Controller may also access data classified as special according to the Regulation, including, for instance, information that may disclose health status, trade union membership, or data defined as judicial by the Regulation. The data processed may refer to the whistleblower and to persons indicated as possibly responsible for the unlawful conduct, as well as those in various capacities involved in the reported events.

Nature of the provision of personal data

Providing your Personal Data is optional for the pursuit of the aforementioned purposes; not doing so may impact the management of the report.

Processing procedures

Data processing will primarily occur through computerized and electronic means, using the "@whistleblowing" software provided by BDO Advisory Services S.r.l.; additionally, a recorded voice messaging system will be used. Suitable tools will be employed to guarantee the security and confidentiality of the data.

Recipients of personal data

Personal data collected through the reporting platform may be processed within the organization of the Data Controller by persons authorized and trained in accordance with Articles 29 and 32, paragraph 4, of Regulation (EU) 2016/679 and Article 2-quaterdecies of the Personal Data Protection Code set forth in Legislative Decree no. 196 of 30 June 2003.

The identity of the whistleblower, and any other information from which their identity may be directly or indirectly inferred, may be disclosed to persons other than those responsible for receiving or following up on reports, and expressly authorized to process such data, only with the express consent of the whistleblower. If the charge relies, either entirely or partly, on the report, and the knowledge of the whistleblower's identity is essential for the defense of the accused, the report will only be admissible for disciplinary proceedings if the whistleblower explicitly consents to the disclosure of their identity.

The data may also be accessible to third-party companies assisting the Data Controller in managing the company's reporting platform as Data Processors, and to parties who are granted access to personal data by law and/or regulatory provisions.

Dissemination and transfer of data

Data will not be disseminated.

The data will not be transferred as a rule outside the European Union. Any transfer of data outside the European Union will occur solely to parties ensuring an appropriate level of processing protection and/or to countries approved by competent authorities for their adequacy. Moreover, transfers will occur to parties offering suitable processing guarantees through regulatory/contractual means, such as the signing of standard contractual clauses.

Legal basis for processing data

The legal basis for processing data in the context of report management is the legal obligation (Legislative Decree 24/2023). This obligation aims to address unlawful conduct, irregularities, breaches of regulations, and actions that may potentially harm financial or corporate reputation. It also serves the purpose of establishing a reporting system in compliance with the provisions of the aforementioned legislation.

Access to the whistleblower's data by persons other than those authorized and trained under Regulation (EU) 2016/679 and Legislative Decree no. 196 of 30 June 2003, is based on the whistleblower's consent.

Retention of personal data

The Controller will process your data for the duration strictly required to fulfill the aforementioned purposes; specifically, internal and external reports, along with associated documentation, will be retained for the time required for processing the report and, in any case, no longer than five years from the date of the communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set forth in Article 12, Legislative Decree 24/2023 and the principle set forth in Articles 5, paragraph 1, letter e) of Regulation (EU) 2016/679 and 3, paragraph 1, letter e) of Legislative Decree no. 51 of 2018.

Personal data that are evidently irrelevant for the processing of a particular report will not be collected. If such data are inadvertently collected, they will be promptly deleted.

Data subject's rights

Lastly, we inform you that you may exercise your rights under the Regulation by writing to privacy@neodecortech.it. Therefore, you may:

- access your personal data, receiving details of the purposes pursued by the Controller, the categories of personal data processed, the recipients to whom the data may be disclosed, the applicable retention period, the existence of automated decision-making processes, including profiling, and, at least in such cases, relevant details on the underlying logic, as well as the significance and potential implications for the data subject, if not already specified in this Disclosure;
- promptly obtain the rectification of inaccurate personal data concerning yourself;
- obtain, in the cases provided by law, the deletion of your personal data not strictly required for the pursuit of the abovementioned purposes;
- obtain the restriction of the processing or to object to their processing, if permitted under the provisions of the law applicable to the specific case.

Where deemed appropriate, the data subject may file a complaint with the Supervisory Authority.

Filago, 17 December 2023

The Data Controller
Neodecortech S.p.A.

Consent to data processing



Having received the information outlined in Article 13 of EU Regulation 2016/679 from the Controller, I hereby provide my consent for my personal data to be disclosed to persons other than those authorized to receive or follow up on reports. This consent applies even in situations where knowledge of my data's identity is essential for the defense of the accused in any disciplinary proceedings.