

## NOTICE PURSUANT TO REGULATION (EU) 2016/679 – "GDPR"

Pursuant to Regulation (EU) 2016/679 (" **GDPR** "), Datalogic S.p.A. (" **Company** " or the "**Data Controller**" or "**Datalogic** ") provides this information regarding the processing of your personal data for the management of the report from you brought to the attention of the Company through the use of the whistleblowing platform accessible via the website: <https://datalogic.integrity.complylog.com/> (the "**Platform**"). "Report" means any communication received from Datalogic via the Platform concerning conduct referable to Datalogic Persons carried out in violation of the Code of Conduct, laws, regulations, provisions of the Authorities, internal regulations, Model 231 however suitable for cause damage or prejudice, even if only to its image, to Datalogic.

For any clarification regarding this information and/or the processing of your personal data, you can contact the Data Controller at any time at the contact details indicated below.

### 1. Data Controller

The Data Controller is Datalogic S.p.A., with registered office in Via Candini n. 2, 40012 Calderara di Reno (BO) - Italy, contactable at the aforementioned address.

### 2. Purpose of the processing and legal basis of the processing

The Data Controller will process your personal data relating to: (i) information provided by you in the Report; (ii) information possibly acquired during the necessary investigative activities for the following purposes: **a.** manage and follow up on the Reports received. The legal basis of the processing is the fulfillment of a legal obligation to which the Data Controller is subject (ex art. 6, letter b, GDPR); **b.** Establish internal procedures in order to prevent and effectively combat fraudulent behavior and illicit or irregular conduct and to support the effective application and operation of the Italian Organisation, Management and Control Model pursuant to the Italian Legislative Decree 231/2001 (so-called "Model 231" ) and, in relation to the seriousness of the violation, to possibly impose disciplinary measures. The legal basis of the processing is represented by the pursuit of the legitimate interest of the Data Controller (ex art. 6, letter f, GDPR); **c.** Ascertain, exercise or defend a right or interest of the Owner in the competent extrajudicial and judicial offices. The legal basis of the processing is represented by the pursuit of the legitimate interest of the Data Controller (ex art. 6, letter f, GDPR) to defend its legal position. This legitimate interest has been appropriately assessed by the Data Controller; **d.** Follow up on requests from the competent administrative or judicial authority and, more generally, from public entities in compliance with legal formalities. The legal basis of the processing is the fulfillment of a legal obligation to which the Data Controller is subject (ex art. 6, letter b, GDPR).

For all the purposes as described above, the provision of personal data is optional but, in compliance with regulatory requirements, the Data Controller may refuse to follow up on anonymous reports.

### 3. Methods

The data - where provided and collected, on a voluntary basis or by law - will also be processed with electronic tools, through the Platform and recorded in specific databases based in the European Economic Area and used strictly and exclusively for the purposes indicated. In any case, the identity and personal data of the interested party (or also " **Reporter** ") will be processed in compliance with their confidentiality, also where possible through the use of encrypted systems and all appropriate technical and organizational measures for the purposes of ensure the safety of the treatment.

### 4. Recipients of personal data

For the pursuit of the purposes indicated in point 2, your personal data may be known by the Data Controller, by the subjects authorized by him to process the Report as well as by any data controllers pursuant to art. 28 of the GDPR. The latter will be specifically identified by the Data Controller who will also provide specific instructions on the methods and purposes of the processing and ensure that they are subject to adequate confidentiality and confidentiality obligations.

The Data Controller may also communicate, provided it is necessary to pursue the purposes of the processing and on the basis of the same lawfulness assumptions indicated in paragraph 2, the personal data collected to third parties belonging to:

- (i) To police, competent authorities and other public administrations. These subjects will act as independent data controllers;
- (ii) To other companies of the Datalogic Group, bodies or associations, limited to the aspects within their competence (for example in the event that the Report also concerns their employees). Unless otherwise indicated, these subjects will act as independent data controllers;
- (iii) To consultant, auditing/revision companies and other companies contractually linked to the Data Controller (even belonging to the same group) which carry out, by way of example, consultancy activities, support for the provision of services etc., which will act, depending on the case, as autonomous data controllers, or data controllers on the basis of a specific agreement on the processing of personal data concluded pursuant to art. 28 GDPR.

The Data Controller guarantees the utmost care so that the communication of your personal data to the aforementioned recipients concerns exclusively the data necessary to achieve the specific purposes for which they are intended.

Your personal data will not be disclosed.

### 5. Transfer of personal data outside the European Economic Area

The transfer of personal data outside the European Economic Area is not foreseen. Where this occurs, the transfer of data to third parties based outside the EU will be carried out in compliance with the requirements established by EU Regulation 2016/679.

## **6. Data retention period**

The data will be processed in the Data Controller's paper and computer archives and protected by suitable security measures for a period of time not exceeding that necessary to achieve the purposes for which they are collected and for any longer period necessary to comply with legal provisions. and/or for judicial protection purposes, in compliance with the ordinary statute of limitations. In detail, your personal data will be kept for 2 years in the event that there is a negative outcome of the assessment of admissibility of the communication, and therefore the communication is not classified as a Report, 5 years in the event that the communication is classified as Reporting, starting from the filing of the file. At the end of the retention period, your personal data will be deleted or irreversibly anonymized.

## **7. Rights of interested parties**

As an interested party, you are granted, where applicable and within the limits identified by the relevant legal provisions, the rights summarized below: **a.** Right of access; **b.** Right to rectification and cancellation. However, the Data Controller has the right to reject the cancellation request if the right to freedom of expression and information prevails or for the exercise of a legal obligation, to defend one's right in court or for the legitimate interest of the Data Controller; **c.** Right to limitation of processing; **d.** Right of opposition. This remains without prejudice to the possibility for the Data Controller to continue the processing by demonstrating the existence of compelling legitimate reasons that prevail over your interests, rights and freedoms; **e.** Right to lodge a complaint and/or an appeal with the Italian Authority for the protection of personal data and/or an appeal with the Italian judicial authority.

You can exercise the rights listed above by writing to the Data Controller at the addresses referred to in point 1.