

## PRIVACY POLICY STATEMENT

### PURSUANT TO ART. 13 and 14 OF REGULATION (EU) 2016/679

Pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR) and Leg Decree 196/2003 as amended and supplemented, BolognaFiere Cosmoprof S.p.A. (**'Cosmoprof'** or **'Controller'**) would like to inform you on the processing of your personal data, in its capacity as the author of a report (**'Whistleblower'**), or as the person to whom the report is submitted (**'Reported'**) or another person involved or mentioned in the Report (**'Other Interested Parties'**), in the context of the management of the so-called *'whistleblowing'* activities governed by the Italian law 24 of 10 March 2023 (**'Decree'**) and implementing the Decree, in the Cosmoprof Organisation, Management and Control Model (**'Organisational Model'**) and, in particular, in the specific 'Whistleblowing Management Procedure' (**'Procedure'**) attached thereto.

In compliance with the Decree and current legislation on the protection of personal data, the processing carried out by Cosmoprof within the framework of *whistleblowing* is aimed, on one hand, at the correct and efficient management of the reports received and, on the other, at ensuring the full confidentiality of the identity of the Whistleblower, in particular to protect him/her from any prejudicial consequences that could arise from the report made, as well as of Other Interested Parties in compliance with the provisions of the Decree and the Procedure.

#### 1. Categories of interest and processed data

When you act as a Whistleblower, Cosmoprof shall process the following personal data

- personal and contact data, such as, for example: name, surname, telephone number, *email* address
- data concerning your job description or duties within the Cosmoprof company organisation;
- any other personal data contained in the report made. The Data Controller may also become aware, in the context of the report, of data that the GDPR defines as sensitive, such as, by way of example, data disclosing health, trade union membership, or judicial data.

On the contrary, if you are the Reported Subject or Other Data Subject, the Data Controller will process any data contained in, or that can be inferred from, the report received.

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

The data will be processed by Cosmoprof for the following purposes:

- a) to receive and manage the reports received, in compliance with the Decree, the Organisational Model and

the Procedure, verifying the facts that are being reported, sending the necessary feedback to the **Whistleblower**, and adopting the appropriate measures.

**Legal basis:** The processing of personal data for this purpose is based on the need to fulfil a legal obligation to which the Data Controller, in its capacity as employer, is subject by reason of the report received (Art. 6.1, c) of the GDPR);

- b) disclose, with the prior consent of the Whistleblower, the identity of the Whistleblower or any other information that might directly or indirectly reveal the identity of the Whistleblower, should the disciplinary proceedings be based in whole or in part on *whistleblowing*, to persons other than those qualified and authorised to receive and follow up Whistleblowing reports.

**Legal basis:** as indicated, this processing requires the specific consent of the Whistleblower (Art. 6.1, a) of the GDPR), which is revocable at any time, without affecting the legitimacy of the processing carried out to that point;

- c) ascertaining, exercising and/or defending a right of Cosmoprof or third parties, including employees of the Data Controller, in court and/or as part of disciplinary proceedings, as well as for internal control and business risk monitoring purposes.

**Legal basis:** the processing of personal data for this purpose is based on the legitimate interest of the Data Controller (Art. 6.1, f) of the GDPR);

The provision of personal data takes place upon your initiative as a Whistleblower and the processing is necessary to allow Cosmoprof to manage the report received, in accordance with the law and the Procedure annexed to the Organisational Model. Instead, the processing is optional in regard to the purposes described under b, in relation to which you may exercise, if justified, your right to object or refuse to provide your consent.

### 3. Data recipients

The identity of the Whistleblower is subject to suitable protection both at the stage of acquisition of the report and at any stage after it. Personal data may only be communicated or made accessible to those persons who are qualified to receive or follow up on the activities of analysis and management of the reports and of any consequent action.

These subjects are duly authorised and instructed to carry out the necessary processing operations in full compliance with the regulations on the protection of personal data and the confidentiality obligations imposed by the Decree. Specifically, these are:

- the members of the Supervisory Board of Cosmoprof;

- the person from Cosmoprof specifically appointed to receive reports;
- the Data Protection Officer, when requested;

The data will be communicated or made accessible to the external company which assists the Data Controller in the management of the platform dedicated to receiving reports (*whistleblowing*), i.e., DigitalPA S.r.l., with registered office at Via San Tommaso d'Aquino 18, Cagliari (09134), VAT 03553050927, duly appointed as data processor pursuant to Article 28 of the GDPR.

In addition to these, the data collected within the scope of the reports may also be communicated to the competent public authorities (e.g., Judicial Authorities, or Authority for the protection of personal data), when required by law or by their prescriptive orders.

Likewise, in the context of disciplinary proceedings, if the accusation is grounded, in whole or in part, on a report, and knowledge of the identity of the Whistleblower is imperative for the reported person's defence, it can only be used for the purposes of disciplinary proceedings if the Whistleblower has given their explicit consent to the disclosure of his/her identity.

#### **4. Disclosure of data.**

The processed personal data will never be published or made available/consulted by unspecified persons.

#### **5. Duration of processing and retention period**

The data included in the report and in the related documentation will be processed for as long as is necessary for the management of the report and the conduct of any proceedings arising therefrom, and, in any case, for no longer than five years from the date of communication of the outcome of the reporting procedure, in compliance with the Decree. Once this period has elapsed, the data will be permanently deleted or otherwise irreversibly anonymised.

#### **6. Rights of data subjects.**

The data subject may, at any time, exercise the rights recognised to them under Art. 15 - 22 of the GDPR, obtaining:

- a) firstly, confirmation as to whether or not personal data concerning them are being processed and, if so, access to them, possibly receiving a copy of them;
- b) the rectification of inaccurate personal data concerning them and the integration of incomplete data;
- c) the deletion of personal data concerning them, if one of the conditions set out in Article 17 of the GDPR applies;

- d) the restriction of processing, i.e., temporary suspension of processing, in the cases provided for by Article 18 of the GDPR;
- e) copy of your personal data in a structured, commonly used, and machine-readable format, including requesting their transmission to another data controller, if technically feasible.

### **6.1 Right to withdraw consent**

Pursuant to Art. 7 of the GDPR, the data subject may withdraw any consent given for specific processing operations at any time, without this affecting in any way the lawfulness of any processing carried out prior to such withdrawal.

### **6.2 Right to object**

Pursuant to Art. 21 of the GDPR, the data subject also has the right to object, at any time, on grounds relating to his or her specific situation, to processing carried out in pursuit of a legitimate interest of the Controller (lett. c) and d) of Par. 2). In the event of an objection, the personal data will no longer be processed, unless there are legitimate reasons that allow Cosmoprof to continue the processing as they prevail over the rights and interests of the data subject, such as where the data are indispensable for the establishment, exercise, or defence of a right of Cosmoprof or of third parties (e.g., employees) in court.

### **6.3 Right to lodge a complaint with the Data Protection Authority**

The data subjects may, at any time, lodge a complaint with the Italian Data Protection Authority if they deem that the processing operations described in this policy have been carried out by Cosmoprof in violation of their rights or the law.

The exercise of the aforementioned rights may be limited if the actual and specific prejudice to the confidentiality of the reporter's identity may result from exercising them (Art. 13, para. 3 of the Decree and Art. 2-undecies of Legislative Decree 196, 2006, the so-called: "Privacy Code").

The rights described above may be exercised by writing to [privacy@cosmoprof.it](mailto:privacy@cosmoprof.it); this request will be answered without delay within 30 (thirty) days of receipt thereof, subject to any extensions in accordance with current legislation.

## **7. Data Controller and Data Protection Manager.**

The Data Controller is BolognaFiere Cosmoprof S.p.A., with registered office in Bologna, Via Alfieri Maserati no. 16.



BolognaFiere Cosmoprof S.p.a.  
sede amministrativa e commerciale/offices:  
via Cappuccini 2, 20122 Milano (Italy)  
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www.cosmoprof.com

To exercise your rights and for any information you may send an email, at any time, to:

- [privacy@cosmoprof.it](mailto:privacy@cosmoprof.it);
- or an ordinary letter to the address: BolognaFiere Cosmoprof S.p.A., Via Alfieri Maserati n. 16. Bologna,

The Data Protection Officer designated by the Data Controller may be contacted at the following email:  
[dpo@cosmoprof.it](mailto:dpo@cosmoprof.it).