

Information pursuant to articles 13 and 14 of the 2016/679 European Regulation on the processing of personal data in the context of the reporting system for alleged offenses ("Whistleblowing")

Autostrade per l'Italia S.p.A. has introduced the "Whistleblowing" tool, as a system for reporting alleged offenses, in the context of the employment relationship, by its own employees, by employees of the companies belonging the "ASPI Group" and by third parties (collaborators/suppliers), in compliance with current legislation on the subject (Law 231/2001, as amended by Law 179/2017).

Autostrade per l'Italia has adopted the "Whistleblowing management procedure", which allows, in the context of reception/processing of the reports, to apply the measures designed to protect all the parties involved in compliance with paragraphs 2- *bis*, 2-*ter* and 2-*quater* of art. 6 of Law 231/2001, as introduced by the aforementioned Law 179/2017 ("Provisions for the protection of whistle-blowers reporting offences or wrongdoings of which they have become aware in the context of a public or private employment relationship") and the legislation on the protection of personal data [European Regulation 2016/679 ("GDPR") and Legislative Decree 196/2003, as amended by Legislative Decree 101/2018 ("Privacy Code")].

Pursuant to articles 13 and 14 of the 2016/679 European Regulation (hereinafter "GDPR"), Autostrade per l'Italia S.p.A. shall provide information on the processing of personal data of the subjects involved in the reception/processing of reports (hereinafter also "Whistleblowing").

1. DATA CONTROLLER

Autostrade per l'Italia S.p.A., hereinafter ASPI, with headquarters in via Bergamini 50, 00159 Rome.

The Data Protection Officer (DPO) for Autostrade per l'Italia S.p.A. can be contacted at the e-mail address dpo@pec.autostrade.it.

The subsidiaries of Autostrade per l'Italia S.p.A. ("ASPI Group") are independent Data Controllers of their employees and/or collaborators and/or suppliers, for the Whistleblowing management activities under their responsibility, as provided for in the SO no. 7/2021 and in the "Whistleblowing management procedure".

2. TYPES OF DATA PROCESSED

In the context of the "Whistleblowing" procedure, the personal data subject to processing are the data of the "Whistle-blower", the "Reported person" and the persons involved and/or connected to the allegations contained in the "Report" (hereinafter "Data subjects").

Personal data collected and processed by Autostrade per l'Italia S.p.A. include "common" personal data of the data subjects (personal data, roles, contact details such as: email address, postal address, telephone number) and, where required, also data belonging to particular categories pursuant to art. 9 GDPR.

Data may be collected both directly from the Data Subject and through other parties involved in the Report, through a special platform and/or the communication channels indicated in point 4 below.

Data are provided voluntarily by the Data Subject/Whistle-blower, in case of non-anonymous reports, to Autostrade per l'Italia S.p.A. which will not process data that are not strictly necessary for the purposes referred to in point 3 below.

3. PURPOSES AND LEGAL BASIS OF THE PROCESSING

As part of the "Whistleblowing" procedure, personal data shall be exclusively processed for the purposes of investigating and assessing the allegations contained in the Report and the adoption of any consequent measures.

Specifically, only data necessary and relevant to achieve the purposes indicated above shall be collected, on the basis of the "principle of minimization".

As far as these data are concerned, they may be provided on a voluntary basis and data subjects are requested to provide only the data necessary to describe the allegations contained in the Report without communicating redundant and additional personal data aside from those necessary to achieve the purposes as described above. If provided, Autostrade per l'Italia S.p.A. will refrain from using such redundant data.

Personal data shall be processed on the legal basis of the legitimate interest of the Data Controller, pursuant to art. 6, par. 1, lett. f) of the GDPR, to manage reports of offenses, of which the Whistle-blower has become aware for work reasons and/or in the context of the employment relationship, as well as to protect the internal and external data subjects involved in the "Whistleblowing" procedure.

Personal data pursuant to art. 9 GDPR, may be processed, where necessary, on the legal basis of the legitimate interest of the Data Controller, pursuant to art. 6, par. 1, lett. f) of the GDPR, for the assessment, exercise or defence of a right in court, as well as on the legal basis pursuant to art. 6, par. 1, lett. b) of the GDPR ("performance of the contract") for specific aspects of the employment relationship.

4. DATA PROCESSING PROCEDURES

In compliance with current regulations, data shall be collected using electronic, computer and manual tools, through procedures strictly connected to the purposes indicated above, in order to guarantee the security and confidentiality of the data.

Specifically, data shall be collected through the following electronic/computer tools:

- the "Whistleblowing" online platform available on the Autostrade per l'Italia website,
- e-mail to the address: segnalazioni@autostrade.it,

as well as using manual ordinary mail tools, to the address: *Ethics Office del Gruppo ASPI*, via Bergamini, 50 Rome, as well as to the voicemail: 06/43634213.

The data collected through electronic/computer tools will not be subject to fully automated processing as specified in art. 22 GDPR.

Specific security measures are adopted to prevent data loss, unlawful or misuse and unauthorized access.

Moreover, pursuant to art. 32 GDPR, specific technical and organizational measures are adopted to ensure the protection of the identity of the data subjects as well as the possible anonymity of the Whistle-blower and complete anonymity in accessing the platform (no log).

5. DATA RETENTION

Personal data shall be retained only for the period strictly necessary for the purposes for which they are collected in compliance with the principle of data minimization pursuant to art. 5.1.c) GDPR and, specifically, for the purposes relating to the management of the investigation, conclusion of the activity for the definition of the Report and adoption of the related measures, in the event of an investigation.

6. DATA RECIPIENTS

Within Autostrade per l'Italia S.p.A., the personal data provided may only be disclosed to persons appointed for data processing by the Data Controller and entitled to process data within the aforementioned activities.

Personal data may be disclosed to third parties (subsidiaries or third-party companies, such as IT service providers) which allow the operation and maintenance of the IT tools on which Reports may be entered, who are required to process the data for the same purposes referred to in point 3 above. Such third parties, for this purpose, are therefore appointed as "Data Processors", pursuant to art. 28 GDPR.

For the performance of some of the activities relating to the "Whistleblowing" procedure, and still for the purposes referred to in point 3, Autostrade per l'Italia S.p.A. may disclose such data to companies belonging to the ASPI Group. Specifically, these companies, to which personal data may be disclosed, shall act as independent Data Controllers, as indicated in point 1 above, for the purpose for the purposes relating to the management of the investigation, conclusion of the activity for the definition of the Report and adoption of the related measures, in the event of an investigation.

The complete list of persons appointed as Data Controllers is available from the DPO.

Under no circumstance are personal data to be disseminated.

7. RIGHTS OF DATA SUBJECTS

Articles 15-22 of the GDPR allow data subjects to exercise specific rights, such as, for example, rights of access, rectification, erasure, restriction of processing

The above rights may be exercised with a request addressed to the Data Protection Officer (DPO) at the following certified mail (PEC) address: dpo@pec.autostrade.it, by using specific forms provided by the Data Controller on the website www.autostrade.it.

Data subjects may lodge a complaint pursuant to art. 57 lett. f) of the GDPR to the Authority for the Protection of Personal Data.

Where the exercise of the aforementioned rights by the Reported Person may result in an actual and real prejudice to the protection and confidentiality of the Whistle-blower's personal data, the Data Controller may restrict, delay or exclude such exercise, pursuant to art. 2-undecies, par. 1, lett. f) of the Privacy Code, thus rejecting the request.

In such cases, the rights of the data subject, pursuant to art. 2-undecies, par. 3 of the Privacy Code, may be exercised through the Authority of the Protection of Personal Data through the procedures set out in art. 160 of the Privacy Code.

8. CROSS-BORDER DATA TRANSFER

Data shall be managed and retained on servers belonging to third-party companies appointed as Data Processors, as indicated in point 6 above, located in Italy and within the European Union.

Personal data may not be transferred outside the European Union.

If necessary, the Data Controller may move the location of the archives and servers to Italy and/or to the European Union and/or to non-EU countries. In the latter case, please be reassured that non-EU data shall be transferred in compliance with the applicable legal provisions. Where necessary, agreements may be entered into in order to ensure an adequate level of protection and/or to adopt the Standard Contractual Clauses provided by the European Commission.