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INFORMATION NOTICE PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679 ON THE PROCESSING OF PERSONAL DATA OF PERSONS REPORTING WRONGDOING (ART. 6 LEGISLATIVE DECREE 231/01)

Pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR), we inform you that the personal data (hereinafter referred to as "Data") provided by you to **Medov Srl** will be recorded in the Company's databases and processed, **solely for the purpose of managing reports of wrongdoing pursuant to Article 6 of Legislative Decree 231/01 that you may submit against a subject**.

1. Who processes the Data?

The Data Controller is **Medov Srl**, VAT/Tax Code No. 01481480992, with registered office at Largo San Giuseppe, 3/36 – 16121 Genoa (GE), PEC: medov@pec.it, represented by its legal representative pro tempore.

The Controller ensures that the processing of personal data is carried out in compliance with fundamental rights and freedoms, as well as dignity, with particular reference to confidentiality, personal identity, and the right to the protection of personal data of the data subject.

You may contact the Data Controller:

- by email at: privacy@ilinvestimenti.com
- by phone at: +39 010 54901

2. Who supervises the processing of the Data?

The Data Protection Officer (DPO), who supervises the proper management of the Data in order to ensure overall compliance with the GDPR, is Massimiliano Calzia, reachable at the email address m.calzia.dpo@gmail.com.

The DPO will never, under any circumstances, have access to or visibility of personal data and therefore to the identity of the reporting person (unless specifically contacted and expressly authorized by the latter).

3. What Data will be processed, for what purposes, and on what legal basis?

The processing involves the provision, through the completion of a form on a [dedicated IT platform](#) (clearly and easily accessible on the website www.medov.it), of common data such as:

- personal details, such as first and last name, date of birth;
- tax code;
- contact details, such as email address and telephone number;
- data regarding professional position held;
- additional data and information related to the reported unlawful conduct;
- as well as any special categories of data relating to trade union membership.

The personal data processed belongs to **Medov Srl** personnel, collaborators and/or suppliers acting as reporting persons and subjects involved.

Medov s.r.l.

Via Scarsellini, 119 - 16149, Genova • Tel.: +39 010.5490.1 • E-mail: operations@medov.it • www.medov.it

Sede legale: Largo San Giuseppe 3/32 – 16121, Genova • Legalmail: medov@pec.it

Capitale Sociale: €300.000,00 i.v. • C.F./Registro Imprese di Genova 01481480992 • P. IVA IT 01481480992 - R.E.A. GE-412511

Società soggetta ad attività di direzione e coordinamento esercitata da I.L. INVESTIMENTI S.r.l.



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The above-mentioned IT platform is equipped with an encryption protocol that ensures the segregation of the reporting person's identity from the content of the report. Only where strictly necessary for verification activities or at the request of external investigative authorities, the Supervisory Body (or strictly authorized personnel operating under an exclusive regime), with appropriate justification, may the report associate the identity of the reporting person.

In such cases, except where liability for slander or defamation under the provisions of the Criminal Code or Article 2043 of the Civil Code may arise, and in cases where anonymity cannot be asserted by law (e.g. criminal, tax, or administrative investigations, inspections by supervisory bodies), the identity of the reporting person is protected at all subsequent stages of the reporting process.

The data provided is processed exclusively for the following purposes:

- proper and complete management of the whistleblowing procedure in accordance with applicable legislation;
- necessary investigative activities aimed at verifying the validity of the reported facts pursuant to Article 54-bis "Protection of public employees who report wrongdoing" of Legislative Decree No. 165/2001, and the adoption of consequent measures;
- ascertaining any unlawful conduct;
- legal defense of a right of the Data Controller;
- responding to a request from the judicial authority or equivalent authority.

The legal basis for such processing is therefore the fulfillment of a legal obligation to which the Data Controller is subject (Article 6(1)(c) GDPR).

The processing of personal data is based on the principles of fairness, lawfulness, and transparency, as well as the protection of confidentiality and the rights of the data subject, and the other principles set out in Article 5 of Regulation (EU) 2016/679.

4. How will the Data be processed?

The processing will be carried out using IT and manual methods, according to criteria compatible with and functional to the purposes for which the Data were collected, in compliance with confidentiality and security rules provided by law and internal regulations.

Your data is processed by authorized personnel, adequately trained and operate under the authority and responsibility of the Data Controller. The processing takes place at the offices and IT systems of **Medov Srl** or, where necessary, at the premises of the entities to which the data are communicated, using both paper and electronic media, including automated tools suitable for storing, managing, and transmitting the data, in compliance with all precautionary measures ensuring their integrity and confidentiality.

The data are processed in accordance with the principle of minimization, lawfully and fairly. The processed data are relevant, complete, not excessive in relation to the purposes of processing, and, where necessary, kept up to date.

It is specified that no automated decision-making or profiling processes are carried out.

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5. How long will the Data be retained?

Personal data will be retained for the time necessary to process the report and in any case no longer than 5 years, starting from the date of communication of the final outcome of the reporting procedure, as well as for the entire period necessary to conduct any proceedings arising from the handling of the report (disciplinary, criminal, accounting). After this period, the data will be deleted pursuant to Article 14 of Legislative Decree No. 24/2023.

Data relating to incomplete reports or reports deemed unfounded due to the lack of essential elements will be deleted immediately.

The Data Controller may be required to retain personal data for a longer period in order to comply with a legal obligation or by order of an authority.

As soon as your personal data is no longer necessary for the purposes indicated above, they will, where possible, be deleted or anonymized.

6. To whom will the Data be disclosed?

In cases provided by law, personal data may be disclosed to the National Anti-Corruption Authority (ANAC), the ordinary judicial authority, or the accounting judicial authority. Disclosure to the ordinary judicial authority may also occur if action is taken against the reporting person for slander or defamation.

Personal data may be accessed for strict technical purposes related to the management and administration of the information and data received, by service providers for the management of the reporting process, who will act as data processors on the basis of specific instructions provided by the Data Controller (External Processor designated: I.L. INVESTIMENTI Srl).

7. Is it mandatory or optional to provide the Data?

The provision of personal data is optional. However, failure to provide such data may prejudice the investigation of the report: anonymous reports will be considered only if they are adequately detailed and supported by sufficient particulars, so as to reveal facts and situations related to specific contexts.

8. Will the Data be transferred outside the European Union?

The processed data is not transferred outside the European Union. Should such a transfer occur, the data will be transferred to countries that ensure data protection systems equivalent to or higher than those required by EU countries.

9. Rights of data subjects and methods of exercise

At any time, data subjects have a number of rights pursuant to Regulation (EU) 2016/679, including:

- a. the right to access their personal data (once confirmation has been obtained that their Data are being processed by the Data Controller);
- b. the right to obtain rectification and integration of their personal data;
- c. the right to obtain deletion of their data;

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- d. the right to obtain restriction of processing of their personal data under certain conditions;
- e. the right to receive the personal data provided to the Data Controller in a structured, commonly used format and to transmit them to another controller;
- f. the right to object to the processing of personal data on grounds relating to their particular situation;
- g. the right not to be subject to automated decision-making;
- h. the right to be informed in the event of a serious personal data breach;
- i. the right to withdraw consent to processing at any time;
- j. the right to lodge a complaint with a supervisory authority.

Such requests may be addressed to the Data Controller, also through an appointed representative, at the following email address: privacy@ilinvestimenti.com or jointly using the DPO contact details indicated above. An appropriate response will be provided without undue delay.

Data subjects who believe that the processing of personal data relating to them violates the provisions of the Regulation also have the right to lodge a complaint with the Data Protection Authority, as provided for by Article 77 of Regulation (EU) 2016/679, or to bring the matter before the competent judicial authorities (Article 79 of Regulation (EU) 2016/679).

10. Update

Date of last update of this information notice: 09/07/2025.

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