



PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

Pursuant to Article 13 EU Regulation No. 2016/679 (hereinafter, "GDPR") and the relevant national legislation, we inform you that the personal data you provide as part of the reporting of offenses and irregularities sent through the Whistleblowing Platform on the website www.rina.org will be processed in the following ways and for the following purposes:

1. JOINT CONTROLLERS AND DATA PROTECTION OFFICER

RINA S.p.A., with registered office in Genoa (GE), via Corsica 12, CF and VAT no. 03794120109, and the other RINA Group Companies to whom the reports refer (together hereinafter the "Joint Controllers") are the Joint Controllers pursuant to art. 26 GDPR, having signed a joint ownership agreement, the essential contents of which are available to you on the website www.rina.org. The Joint Controllers can be reached through the contacts indicated on the website www.rina.org. The Data Protection Officer may be contacted at the e-mail address rina.dpo@rina.org.

2. OBJECT OF PROCESSING

The Joint Controllers will process your personal identification and contact data (hereinafter also "data") relating to the relationship with the RINA Group, as well as all other data that you will be entered within the reporting form or subsequently acquired by the recipients of the reports as part of the preliminary investigation. It is not excluded that the Joint Controllers may also process particular categories of data, referred to in Article 9 of the GDPR.

The provision of the whistleblower's personal identification data is optional and voluntary. In any case, if you do not intend to give your data to the Joint Controllers, you can make the report anonymously or semi-anonymously, the latter by agreeing to provide your identity only to the supplier of the Whistleblowing Platform without authorizing its transmission to the RINA Group. In the latter case, the Data Controller is the supplier Safecall Limited, a circumstance for which we therefore invite you to read the relevant Privacy Notice at the following link <https://www.safecall.co.uk/en/privacy-policy-whistleblowing/>.

3. PURPOSE AND LEGAL BASIS OF PROCESSING

The Joint Controllers will process your personal data, solely for the following purposes:

- sending and taking charge of the report by the recipients,
- sending any requests and / or receiving feedback to the requests sent by the whistleblower and by the recipients of the report,
- preliminary investigations: carrying out checks on the report validity,
- feedback on the outcome of the report,
- prevention and repression of unlawful acts, including on a disciplinary basis.

The legal basis of the aforementioned processing can be found in the fulfillment of the legal obligation pursuant to art. 6, c. 2-bis of Italian Legislative Decree 231/01, introduced by Italian Law 179/2017 (Article 6, paragraph 1, letter c) of the GDPR), where the Joint Controllers involved operate in Italy, as well as in the legitimate interest of the Joint Controllers to prevent and suppress unlawful acts and, if necessary, protect the rights and legitimate interests of the Joint Controllers and / or third parties, even in court (Article 6, paragraph 1, letter f) of the GDPR).

As regards the processing of particular categories of data, the legal basis can be also found in



Article 9, par. 2, lett. b of the GDPR as the processing is necessary to fulfill the obligations and exercise the specific rights of the Data Controller or the data subject in the field of labor law and social security and social protection, as well as in Article 9, par. 2 lett. g of the GDPR as the processing is necessary for reasons of significant public interest on the basis of Legislative Decree 196/2003 art. 2 sexies.

4. DATA PROCESSING AND STORAGE METHODS

Personal data is processed pursuant to art. 5 of the GDPR and in accordance with the principles of lawfulness, correctness and transparency.

Personal data will be kept for the time necessary to fulfil the above purposes and in any case no longer than 10 years from the closing date of the investigation relating to the report. Should the Joint Data Controllers have a documented need to retain the data for a period longer than 10 years (for example, in the event that deletion might compromise their legitimate right of defence), further retention may take place by limiting access to the data only to the Head of the legal department, until the related dispute is closed.

In any case, the adoption of every technical and organizational measure adequate to guarantee the security of personal data pursuant to the GDPR is ensured.

5. RECIPIENTS OF THE DATA

Personal data may be made accessible to internal subjects formally authorized for processing by the Joint Controllers (as required by the Whistleblowing Procedure published on the website www.rina.org), or to third parties who provide services necessary for the fulfillment of the purposes referred to in point 3, expressly designated as Data Processors. In particular, your data may be accessed by the external party that manages the Whistleblowing Platform. A complete list of Data Processors is constantly updated and available at the headquarters of Rina S.p.A.

Your personal data may also be disclosed to public entities, for the fulfillment of legal obligations or to satisfy requests from the judicial or public security authorities.

6. DATA TRANSFER

Your personal data are also processed and stored outside the European Economic Area, including by being entered in shared databases and / or managed by third companies, that are or are not part of the control perimeter of the Joint Controllers. The management of the database and the processing of such data are bound to the purposes for which they were collected and are carried out in full compliance with the standards of confidentiality and security, pursuant to the applicable personal data protection laws.

From now, the Joint Controllers ensure that the data transfer outside the EU will take place in compliance with the applicable legal provisions, also through the provision of Standard Contractual Clauses envisaged by the European Commission and the adoption of Binding Corporate Rules for intra-group transfers.

7. RIGHTS OF THE DATA SUBJECT

In relation to the purposes of the processing and as a Data Subject, you have the following rights:



- a. **Right of access** (art. 15 GDPR): to obtain confirmation of the existence or otherwise of processing of personal data concerning you, as well as to obtain a copy of such data;
- b. **Right of rectification** (art. 16 GDPR): to obtain, without undue delay, the correction of inaccurate personal data concerning you and the integration of incomplete personal data or cancellation;
- c. **Right of erasure** (art. 17 GDPR): to obtain from the Joint Data Controllers the cancellation, without undue delay, of the data concerning you, in the cases provided for by the GDPR;
- d. **Right to restriction of processing** (art. 18 GDPR): obtain from the Joint Controllers the limitation of the processing, in the cases provided for by the GDPR;
- e. **Right to data portability** (art. 20 GDPR): to receive in a structured format, commonly used and readable by an automatic device, the personal data concerning you provided by the Joint Controllers and to obtain that the same are transmitted to another owner without impediments, in cases provided for by the GDPR;
- f. **Right to object** (art. 21 GDPR): to object at any time to the processing of personal data concerning you, for reasons connected with your particular situation;
- g. **Right to lodge a complaint with the Supervisory Authority** (art. 77 GDPR): lodge a complaint with the competent national Authority for the protection of personal data.

It should be noted that the requests made by Data Subject may be rejected in the cases provided by current legislation. In any case, the Joint Controllers will provide feedback to the Data Subject, possibly giving evidence of the reasons for the reject. A case that justifies the denial is that in which the exercise of these rights can cause an effective and concrete prejudice for the carrying out of the defensive investigations connected to the management of the reports or for the exercise of the right in court by the Joint Controllers and / or third parties limited to this period of time.

7. METHODS OF EXERCISING RIGHTS AND COMMUNICATIONS

The Joint Controllers has appointed a Data Protection Officer, who may be contacted at any time for all matters relating to the processing of your personal data and to the exercise of the relative rights.

Therefore, you can contact the Data Protection Officer at any time by sending an e-mail to rina.dpo@rina.org.

Best regards.

The Joint Controllers.