

This information notice is addressed to whistleblowers, to the natural persons who assist the whistleblower in the reporting process (so-called facilitators) and, lastly, to the natural persons to whom the information content of the report may refer, in their capacity as persons involved in various ways in the reported events.

**JOINT DATA
CONTROLLERS**

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**TYPE OF DATA
PROCESSED**

The following personal data may be processed:

- common identification and contact data of the whistleblower;
- identification data of the persons involved in the report, information and data relating to the reported violations;
- any other information relating to the whistleblower, the persons involved in the report and any other third parties that the whistleblower decides to share in order to better represent the facts described in the report; it is specified that in this case the joint controllers are not in a position to determine a priori the information that is the subject of the report, which may therefore also include particular data or data relating to criminal convictions and offences;
- identification, contact and account data for access to the IT platform of the persons in charge of handling the reports.

**ORIGIN OF THE
DATA AND NATURE
OF THEIR
PROVISION**

The personal data to be processed are those provided by the whistleblower and those that may be collected independently in the course of the investigation, which are necessary to ascertain the circumstances that are the subject of the report.
The provision of the data is necessary and functional for the management of reports received in the form and manner described in the procedure adopted by the company.

**PURPOSE OF THE
PROCESSING**

The personal data will be collected and processed for purposes related to the management of reports of breaches concerning: i) national and EU legislation relating to sectors and interests relevant to the Union; ii) breaches relevant under the 231/2001 regulation or breaches of organisational models; iii) further civil, administrative and accounting offences covered by national legislation; with the methods and tools described in the “Report Management Procedure” adopted by the joint controllers.

**LEGAL BASIS FOR
PROCESSING**

The processing of the data stems from the need to fulfil a legal obligation (Art. 6(1)(c) of the GDPR) and precisely the provisions of (It.) Legislative Decree no. 24/2023 implementing EU Directive 2019/1937 on the protection of persons who report breaches of Union law and national laws.

**DURATION OF THE
PROCESSING AND
SECURITY
MEASURES**

The reports and the related documentation shall be kept for as long as necessary to process the report and in any case no longer than five years from the date of the communication of the final outcome of the reporting procedure, subject to the whistleblower’s confidentiality obligations.
Personal data that are clearly not useful for the evaluation of the report will be deleted immediately.
Encryption techniques are applied to the reporting platform and all data are fully encrypted, thus guaranteeing the confidentiality of the information transmitted.

**RECIPIENTS OF THE
PERSONAL DATA**

The personal data will be processed by the appointed Data Processor and case manager in the platform, as well as by the members of the Supervisory Body, if the report concerns violations of the Organisation and Management Model (O.M.G. 231), in accordance with the provisions of the relevant legislation in force and the Whistleblowing “Report Management Procedure” adopted by the Companies.

These persons are required to guarantee the confidentiality of the identity of the whistleblower and of the information they have come to know.

The identity of the whistleblower or any other information from which that identity may be directly or indirectly inferred may only be disclosed with the express consent of the whistleblower. Where necessary for the purposes of the investigation, certain information related to the report may be processed by:

- other departments of the companies to which specific instructions have been given;
- consultancy, auditing firms or persons performing services instrumental to the above-mentioned purposes, limited to the information necessary for the functions assigned to them;
- lastly, the data may be transmitted, in the cases provided for, to the Judicial Authority, and/or to the competent Authorities.

With regard to such data, the Data Subjects may exercise their rights under CHAPTER III of Regulation (EU) 2016/679 (GDPR) in the cases provided for.

In particular, the whistleblower may exercise his or her right to access his or her data, to rectify or supplement them, to have them erased and to restrict processing in the same way as he or she made the report.

The whistleblower, pursuant to Art. 77 of the GDPR, also has the right to lodge a complaint with the Italian Data Protection Authority if he or she considers that the processing violates the aforementioned Regulation.

Please note that the exercise of the aforementioned rights by other data subjects, such as the whistleblower or other persons involved, may be delayed, limited or excluded if such exercise may result in an actual and concrete prejudice to the confidentiality of the whistleblower's identity as envisaged in Article 2-undecies, letter f of the Privacy Code (implementing Article 23 of the GDPR). In such cases, the aforementioned rights may be exercised through the Italian Data Protection Authority in the manner set out in Article 160 of the Privacy Code.

YOUR RIGHTS