

## WHISTLEBLOWING - PRIVACY DISCLOSURE

Pursuant to Regulation (EU) 2016/679 ("GDPR"), (the "Company" or the "Data Controller") sets out below the disclosure on the processing of the personal data of whistleblowers, of the parties reported by them and of all the other parties involved in the management of Whistleblowing – obtained directly from them and/or from third parties – in relation to the activities described in the document "Whistleblowing Policy" CIA-P-0-0-001E02 (the "Policy").

### Data Controller

The Data Controller is Bracco S.p.A. with registered office in Via Egidio Folli 50, Milan.

The references to "Bracco", "group", "subsidiaries", "we", "us" and "our" are to be understood to signify Bracco S.p.A. and its branches and subsidiaries worldwide.

### Contact data of the Data Protection Officer (DPO)

Bracco has designated a Group Data Protection Officer who may be contacted at the following email address: [dpo@bracco.com](mailto:dpo@bracco.com).

### Purpose of data processing and legal basis for processing

Processing of personal data is necessary for the management by Bracco and its subsidiaries in and outside Italy of whistleblowing by the party concerned including whistleblowing via an on-line digital platform (the "Platform") as regulated by the Policy.

Processing is necessary for (i) compliance with a legal obligation to which Bracco is subject or (ii) the pursuit by Bracco of legitimate interests such as the prevention of criminal, civil and/or administrative offences or (iii) the establishment, exercise or defence of a right in court.

### Categories of processed data

Bracco may process various categories of data, supplied directly or otherwise collected through the Whistleblowing process. Besides the personal and contact data mentioned above, which are collected only in the case of registration of the whistleblower, data processing may also refer to particular categories of data pursuant to article 9 of the GDPR, and also to data relating to criminal convictions and offences pursuant to article 10 of the GDPR. The data will be used only where strictly necessary for the management of the complaint, fully respecting the principles of proportionality and necessity and, if deemed irrelevant for the purposes of the Whistleblowing Report, will not be subject to further processing.

Whistleblowing on the Platform may be made only by filling in the forms available on the Platform.

When personal data are provided voluntarily by the user by email or by filling in the forms on the website, the Data Controller is authorised to process said data.

Whistleblowing may be anonymous or by a named party; the following personal data may be processed when Whistleblowing is via the Platform:

**a. Browsing data:** the IT systems and software procedures used to operate the Platform acquire, in the course of their normal functioning, certain personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified parties, but could, by its nature, when processed and associated with data

|               |  |   |
|---------------|--|---|
| Bracco S.p.A. |  | 1 |
|---------------|--|---|

held by third parties, enable browsing users to be identified. This category of data includes IP addresses, the types of device used to access the Platform, the domain names of the computers employed by the users who connect to the Platform, the type of browser used, the Uniform Resource Identifier addresses of the requested resources, the time of the request, the method used to put the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the web server (successful outcome, error, etc.) and other data relating to the user's operating system and IT environment.

**b. Data provided by the user on a voluntary basis:** the elective, explicit and voluntary transmission of electronic mail to the addresses indicated on the Platform and the filling in of the forms (masks) specifically provided lead to the subsequent acquisition of the email address and of any other data in the electronic communication, as well as of the data of the sender/user, which is necessary in order to reply to requests or to manage the report made by the user through the Platform functions. In the case of whistleblowing by an “identified” party, the personal data voluntarily provided by the user when filling out the masks are processed, as are the browsing data.

In the case of whistleblowing by an “anonymous” whistleblowing, only the browsing data are processed. In addition to the above-mentioned data through the Platform the information on the reported party will also be processed.

### **Data processing procedures and security measures**

Personal data are processed with automated and non-automated instruments.

### **Data storage**

Data will be stored for a period of time no longer than that needed for the purposes for which they are collected or processed. In any case your personal data will be stored for ten (10) years except in the case of compliance with the legal obligations to which Bracco is subject or for the establishment, exercise or defence of rights.

### **Protection of information - Security - Automated decisions**

Bracco uses appropriate technical and organisational measures to protect the information it collects. Specific security measures are adopted to prevent the loss of data, unlawful or incorrect use and unauthorised access. The transmission of data provided by the user on a voluntary basis by filling in the fields present in the various sections of the website is managed with technology that encrypts the information before it is exchanged via the Internet between the user terminal and the Platform services, thus making it incomprehensible to unauthorised parties and guaranteeing the confidentiality of the information transmitted. The entire data transmission to the Platform services is encrypted using the TLS 1.2 protocols to guarantee a secure connection. When we process information, we adopt reasonable measures to protect it against loss, improper use, unauthorised access, divulgation, alteration or destruction.

Bracco does not perform any type of automated processing for analytical or forecasting purposes.

## **Communication of personal data**

Personal data are used by Corporate Internal Audit, Legal Affairs & Compliance, Human Resources and eventually by other company departments or units assigned to manage the Whistleblowing process.

In order to conduct the complaint procedure, the information may also be communicated to third parties such as public authorities/government agencies, third parties that provide us with services (such as audits, computer services), commercial partners and consultants (such as law firms).

In the event that matters of criminal significance emerge, we shall forward the report to the competent judicial authorities.

## **Personal data transfers outside the European Economic Community (EEC) or Switzerland**

Personal data is acquired and processed on computer systems located in the EU.

For EEC or Swiss residents: should personal information be transferred outside the EEC/Switzerland, the necessary measures will be adopted to guarantee that appropriate safeguards are put in place to protect the information. These safeguards include the use of approved standard contractual clauses.

## **Rights of interested parties**

### Access, amendment, deletion, opposition, portability

Under the applicable law on personal data protection, the interested party has the right to request a copy of the information in Bracco's possession. The interested party also has the right to amend, correct or delete this information. These rights may be subject to legal restrictions. In some circumstances, it is possible to formally oppose processing of data, to request that processing be limited and to request a copy of the data to be provided to the interested party, or to third-party data controllers indicated by the interested party, in digital format.

### Presentation of a complaint to the personal data protection authorities

The interested party has the right to present a complaint directly to the personal data protection authority if they deem that processing has taken place unlawfully or breaches their rights under the data protection law.

Without in any way limiting the right to present complaints to a competent authority, the interested party may apply directly to Bracco for all requests.

## **Contacts**

For any queries about this disclosure or to obtain further information about Bracco personal data protection practices, or to exercise the above rights, or to present a complaint, you may contact us via email at [dpo@bracco.com](mailto:dpo@bracco.com) or at the postal address: Bracco S.p.A. Via Egidio Folli, 50 - 20134 Milan (MI) - Att. Group DPO.

**Latest update: September 2020**