

**PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA
PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679 ("GDPR") -
WHISTLEBLOWING PROCEDURE**

Dear Whistleblower,

ITA - Italian Trade Agency would like to thank you for choosing to make a whistleblowing report. Your privacy is important to us, and we want to assure you that your personal data will be processed in accordance with applicable privacy laws. This privacy notice provides information on the collection and use of your personal data during this procedure. Please read it carefully before providing any information, as transparency and fairness towards those reporting facts and/or behaviors potentially related to anti-corruption regulations are fundamental principles of this Public Administration.

Data Controller and Data Protection Officer

The data controller for the processing of personal data is ICE - Agenzia per la promozione all'estero e l'internazionalizzazione delle imprese italiane, located at Via Liszt, 21 - 00144 Rome, telephone: 06 59921 (hereinafter "ITA"). The Data Protection Officer can be contacted at the following email address: privacy@ice.it.

Types of Personal Data Collected

During the whistleblowing procedure, we may collect the following types of personal data:

- name, surname, and contact information (e.g., email address or phone number), if applicable;
- information about the facts and circumstances subject to the whistleblowing report.

Purposes of the Processing

The processing of your personal data is carried out by ITA in the performance of its related activities, and they will be processed using both electronic and non-electronic means for the following purposes:

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- allowing the receipt and management of whistleblowing reports in cases where the use of reporting channels via phone, messaging, or in-person meetings is preferred;
- managing the technical activities of the whistleblowing platform in cases where the use of this reporting mode is preferred;
- allowing r access to the whistleblowing reporting platform;
- assessing and researching elements related to the whistleblowing report;
- maintaining anonymity;
- communicating any updates on the report or requesting further information;
- complying with legal and regulatory obligations to which ITA is subject;
- fulfilling any other obligations strictly connected to the current legislation on whistleblowing and prevention of corruption.

Legal Basis for the Processing

The processing of personal data is based on the following legal grounds:

- legitimate interest in:
 - detecting any violations of rules or internal administrative procedures;
 - identifying and promptly preventing situations of risk or potential harm;
 - initiating internal or external procedures to verify the merits of the whistleblowing reports and taking appropriate actions;
 - demonstrating this Administration's compliance with transparency and accountability standards;
- fulfillment of legal obligations to which ITA is subject.

Sharing of Personal Data

The personal data collected during the whistleblowing procedure may be shared with the following categories of recipients:

- trained personnel authorized and appointed by ITA to evaluate and gather additional information about the report;
- competent authorities, if required by applicable laws;
- other third parties, if necessary to protect the rights and legitimate interests of ITA.

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In case you have chosen to make a verbal report or report in person, please be informed that the staff you will communicate with has been formally authorized to perform this task and has received adequate training. All the information will be appropriately stored in the specific platform for whistleblowers.

Personal data may also be managed through online software or cloud services located within the European Union, in compliance with the rights and guarantees provided by the European General Data Protection Regulation 2016/679 (GDPR).

As a technical partner, ITA has appointed the following company as the Data Processor:

Whistleblowing Solutions IS S.r.l.:
Viale Abruzzi 13/A - 20131 Milan – Italy
T: +39-02-87186005
F: +39-02-87162573
DPO: dpo@whistleblowingsolutions.it

The complete and updated list of any additional Data Processors is available upon request at the email address: privacy@ice.it.

Transfer of Data Outside the European Economic Area (EEA)

As stated above, personal data will be processed exclusively within the European Economic Area, ensuring compliance with the privacy and data protection regulations established by the GDPR.

In specific cases where a whistleblowing report concerning potential illicit conduct requires activities to be carried out outside the European Economic Area (EEA), the collected personal data may be transferred and processed in countries outside the EEA. ITA undertakes to ensure that such transfers comply with applicable privacy laws and that adequate data protection measures and whistleblower protection are implemented according to the current standards of privacy confidentiality and security.

Data Retention Period

Personal data will be retained for a reasonable period of time in accordance with the aforementioned processing purposes and all legal obligations.

Rights of the Data Subject

The data subject may exercise their rights at any time, including the right to access their personal data, request their rectification or limitation, request updates if incomplete or inaccurate, and request their deletion if collected unlawfully. The data subject also has the right to data portability, i.e., to receive their personal data in a structured, commonly used, and machine-readable format. To exercise these rights, the data subject can contact the Data Controller or the Data Protection Officer.

It is also possible to lodge a complaint with the Italian Control Authority - Garante per la protezione dei dati personali - Piazza Venezia n. 11 - 00187 Rome. For more information, you can send a request to the email address: privacy@ice.it.

Please note that if a report is not made by an identifiable person, it will be treated, as provided by Legislative Decree no. 24 of 10/03/2023 and subsequent ANAC Guidelines, as an anonymous report and will not benefit from the protections guaranteed by the whistleblowing procedure. However, it will still be examined according to the inspection procedures in force at ITA to verify the existence of the described misconduct. As stated in the above-mentioned ANAC Guidelines, even in the case of an anonymous report, you will benefit from the protections granted to a whistleblower in case retaliatory measures are taken against you.

This privacy notice may be subject to changes or updates if the regulatory framework or ANAC guidelines on this matter change in the future. Therefore, we invite you to periodically review this notice to stay updated on any changes.