

## PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA

### Whistleblowing

Edison S.p.A. ("EDISON") and the companies of the Edison Group, which operate as independent Data Controllers, hereby inform you that, in accordance with Articles 13 and 14 of the European General Data Protection Regulation, No. 2016/679 ("Regulation") and Legislative Decree 196/03 and subsequent amendments, personal data processed within the scope of Whistleblowing Reports will be processed in compliance with the provisions of the Privacy Code and the Regulation, for the purposes outlined in point 4 below.

#### 1. Data Source

The personal data subject to processing is collected from the Whistleblower, when provided directly by the Whistleblower, and from third parties, when collected from third parties during activities related to the management of the Report.

#### 2. Recipients

This Information applies to Whistleblowers, reported individuals, facilitators, and all individuals involved and/or mentioned in the Report or its management<sup>1</sup>. In the following text, the aforementioned individuals are referred to as "**data subjects**" in relation to the processing of personal data.

#### 3. Types of Data Processed

Reports can be submitted by the Whistleblower either by disclosing their identity or anonymously. In the latter case, no data related to the Whistleblower will be processed. The data subject to processing includes personal details, contact information, and any personal data, including special categories of personal data and judicial data, provided by the Whistleblower and the reported individual within the scope of the Report and its management.

#### 4. Purposes, Legal Basis of Processing, and Data Retention Period

The personal data collected will be processed for the following purposes:

• Purposes of processing based on **compliance with a legal obligation** (Legislative Decree 231/2001, Law 179/2017, Legislative Decree 24/2023, EU Directive 2019/1937):

1. Management of reports received through the channels provided by the Company regarding alleged behaviors, acts, or omissions that harm the public interest or the integrity of the Data Controller, as well as any further activities related to Reports.
2. Management of responses to requests from competent administrative or judicial authorities and, more generally, public authorities in compliance with legal requirements.

The provision of personal data is not mandatory. Personal data processed within the scope of Reports will be retained for a period not exceeding 5 years from the date of communication of the final outcome of the reporting procedure. Personal data that are clearly not useful for the management of the Report, if accidentally collected, will be deleted once their relevance is excluded.

#### 5. Processing Methods

Edison Spa

Foro Buonaparte, 31  
20121 Milano  
Tel. +39 02 6222 1

Capitale Soc. 4.736.117.250,00 euro i.v.  
Reg. Imprese di Milano - Monza - Brianza - Lodi e C.F. 06722600019  
Partita IVA 08263330014 - REA di Milano 1698754  
Codice destinatario RWYUTBX

In relation to the aforementioned purposes, data processing will take place using both IT and telecommunications tools and on paper supports, using suitable tools to ensure security, availability, integrity, confidentiality, and possible anonymity, through the adoption of appropriate security measures as prescribed by the Regulation.

## **6. Categories of Data Recipients**

The Personal Data collected within the scope of reports may be known by individuals responsible for managing the reporting channel, authorized and duly instructed by the Data Controller, or Data Processors duly appointed in accordance with Article 28 of the GDPR, equally instructed, may become aware of the personal data processed. In no case will the aforementioned data be disclosed to other recipients, except as required by specific mandatory legal provisions.

## **7. Data Disclosure**

Personal data collected within the scope of Whistleblowing Reports will not be disclosed in any way outside the company's scope and/or published on the company's website, except as required by law.

## **8. Data Controllers and Data Processors**

The Data Controller, i.e. the entity that determines the purposes of processing, is Edison S.p.A. or the companies of the Edison Group acting as independent Data Controllers. The Data Processors, i.e. entities that carry out processing on behalf of the Data Controllers, are the companies of the Group and service providers designated as such in accordance with Regulation 2016/679 by the Data Controller.

## **9. Data Protection Officer**

This figure, provided for by the Regulation to protect the rights of data subjects, has been identified as the common reference for the Edison Group companies subject to direction and coordination or controlled by Edison S.p.A. and other Group companies. The Data Protection Officer contact details are provided in the following section of this Information (Article 10).

## **10. Exercise of Rights**

Under Regulation 2016/679, data subjects have the right to access their data, to obtain confirmation of whether or not the data exists and to know its content, origin, geographical location, and request a copy at any time. In addition, data subjects have the right to verify its accuracy or request its integration, updating, correction, limitation of processing, erasure, transformation into anonymous form, or blocking of data processed in violation of the law, as well as the right to object to processing in any case. Furthermore, data subjects have the right to request data portability and to lodge a complaint with the supervisory authority. Data subjects can exercise their rights by writing to the attention of the Data Protection Officer (DPO) via:

E-mail: [privacy@edison.it](mailto:privacy@edison.it)  
Certified E-mail: [privacy.gruppoedison@pec.edison.it](mailto:privacy.gruppoedison@pec.edison.it)  
Fax: 02/62229105  
Regular mail: DPO c/o Edison S.p.A., Foro Buonaparte 31, 20121 Milano (MI)

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<sup>i</sup> “Whistleblower”: the individual who makes the report or public disclosure of information about violations acquired as within his or her work environment.

“Facilitator”: the individual who assists the Whistleblower in the reporting process, operating within the same work environment and whose assistance must be kept confidential.