



Livorno, 17 July 2024

Prot. 2024/OUT/GENER/B/0183

WHISTLEBLOWING POLICY

pursuant to Articles 13 and 14 of Regulation (EU) 679/2016

1) Data controller

OLT Offshore LNG Toscana s.p.a., with registered office in Via Passione 8, Milan (MI), PEC: oltoffshore@legalmail.it, as Controller of the processing of your personal data, pursuant to Regulation (EU) 679/2016 'on the protection of natural persons with regard to the processing of personal data and on the free movement of such data', hereby informs you that your personal data will be processed based on the principles of correctness, lawfulness, transparency and the protection of the right to confidentiality.

2) Representative of the Data Controller and Data Protection Officer

This organisation has not appointed a Data Controller's Representative or Data Protection Officer (DPO), as they are not necessary under the Regulation itself.

3) Type of data processed and purpose of the processing

Your personal data are processed above all for the handling of the report, i.e. to investigate and decide on the report, in accordance with the forms and limitations provided for by Legislative Decree no. 24/2023.

The data processed will be those necessary to handle the report, sent by you or collected during the preliminary investigation, and may concern:

- a) personal details and contact data;
- b) data on roles and duties;
- c) data relating to the reported offence, e.g. written documents, photographs, videos, judicial data, health data, etc. also relating to third parties involved in the report.

The personal data provided will in any case be processed in such a way as to protect the confidentiality of the whistleblower's identity.

4) Legal basis and lawfulness of the processing

With reference to the lawfulness of the processing, the undersigned notes that the legal basis on which the processing is based is as follows: Art. 6, paragraph 1, letter C of the GDPR, i.e. for compliance with a legal obligation to which the controller is subject, identified in Legislative Decree no. 24/2023.

5) Processing methods

All processing is performed adopting security, technical and organisational measures that are



appropriate for the processing itself as set forth in Article 32 of the Regulation.

All data are processed using electronic and/or manual means and measures are taken to minimise processing in terms of type of data, access authorisations and retention times, in compliance with the provisions of Legislative Decree no. 24/2023 and with the provisions described in the adopted 'Whistleblowing Procedure'.

6) Nature of the provision of data

The provision of personal data is optional when making a report.

However, failure to provide, or partial provision of the data referred to in Art. 3 points a), b), c), of this policy may make it impossible to effectively follow up the report.

7) Persons authorised to process data

To guarantee the whistleblower's confidentiality, his/her identity will be known only to the manager of the internal whistleblowing channel, as better specified in the specific 'Whistleblowing Procedure', as the person authorised to process the data and specially trained, in accordance with the provisions of Legislative Decree no. 24/2023.

The whistleblower's identity and any other information from which the same may be inferred, directly or indirectly, cannot be disclosed to persons other than those entitled to receive or follow up the reports.

The right to confidentiality ceases to apply if the whistleblower can be held liable for slander and defamation, pursuant to the Criminal Code or Article 2043 of the Civil Code, or in the cases provided for in Article 12 of Legislative Decree no. 24/2023.

8) Categories of recipients of personal data and automated decision-making process

Your personal data and those of the persons indicated as possibly responsible for the unlawful conduct, as well as of the persons involved in various ways in the reported events, will not be disclosed.

However, where appropriate, such data may be forwarded to the competent Authorities in the event of violations of the applicable regulations, as well as forwarded at the request of the same Authorities.

Your data will not be entered in any automated decision-making process.

9) Transfer of data outside the European Union

Your data will not be transferred to a third country or to an International Organisation (country outside the Union).

10) Retention period

Your personal data will be retained for 5 years from the date of notification of the final outcome of the report.



11) Rights of the data subject

You have the right to request from the Data Controller access, erasure, communication, updating, rectification, objection to processing, integration, restriction, portability, knowledge of the breach of your personal data as well as, in general, all the rights provided for in Article 13 et seq. of EU Regulation 679/2016. All the aforementioned rights may be exercised by writing to the Data Controller's registered office, or to the following certified email address: oltoffshore@legalmail.it. Specifically, the exercise of the rights referred to in Art. 15 et seq. by the Reported Data Subject will be ensured in a way that is compatible with the requirements of confidentiality of the identity of the Reported Data Subject of Art. 2 undecies of the Privacy Code.

12) Right to complain

You have the right to lodge a complaint with the competent supervisory authority 'Garante Privacy Italiano' if you believe that your rights in terms of personal data protection are at risk (www.garanteprivacy.it).

The Data Controller
OLT Offshore LNG Toscana s.p.a.

A handwritten signature in blue ink, appearing to read 'Stammi Gioi', is written over the printed name of the Data Controller.