

## Privacy notice pursuant to Article 13 of the EU Regulation 2016/679 and to the applicable legislation

Pursuant to Regulation (EU) 2016/679 ("GDPR"), Suzuki Italia S.p.A. (the "**Company**" or the "**Data Controller**") provides this privacy notice regarding the processing of personal data for the management of the report submitted to the attention of the Company as part of the whistleblowing reporting procedure.

In particular, it should be noted that personal data are collected and processed for the purpose of handling the report made pursuant to the Whistleblowing Procedure available at [www.suzuki.it](http://www.suzuki.it), Code of Ethics, Model 231 and Company Policies ("**Whistleblowing Report**").

The following privacy notice is provided for the purposes of transparency vis-à-vis the reporters, in order to make them aware of the terms and conditions of data processing, including the exercise of related rights and their limits in the light of the provisions of the Legislative Decree 24/2023.

If the Whistleblowing Report is received from a person who is linked by an employment or collaboration relationship with the Company, this information must be understood as supplementing and not replacing the information given to the employees for the management of the employment and/or collaboration relationship.

[The reports referred to in Legislative Decree 24/2023 may be made through the channels and methods provided for in the Whistleblowing Procedure adopted by the Company, namely:

- a) in writing, to be sent by letter or by hand. The person making the Whistleblowing Report, therefore, will have to insert it in two sealed envelopes: in the first envelope, he/she will have to indicate his/her identification data, together with a photocopy of his/her identity document; in the second envelope, the content of the Whistleblowing Report, so as to separate his/her identification data from the Whistleblowing Report. Finally, both envelopes should then be placed in a third closed envelope, which must bear the wording "Confidential/Personal" on the outside and which must be addressed to the Regulatory Body at Suzuki Italia S.p.A., with registered offices in Turin, Via Ettore de Sonnaz 19, which will take care of its protocol, also by means of an autonomous register;
- b) orally, through the voice messaging system at the number 328-6445788. In this case, the consent of the Whistleblower is required- and the Whistleblowing shall be documented by the Supervisory Body (hereinafter also "**SB**"), either by recording it on a device suitable for storage and listening or by minutes].

### Categories of data processed

The personal data of the Whistleblower, and those of other persons who may be involved in and/or connected to the facts that are the subject of the Whistleblowing Report (or also the "**Whistleblower**" or the "**Third Party**"), acquired in connection with the handling of Whistleblowing Reports, shall be processed in full compliance with the provisions of the GDPR and the Whistleblowing Procedure.

The personal data collected and processed by the Company include (i) data of the Reporting Party of a common nature (personal data, identification data, contact data); (ii) data of a common nature of the Reporting Party and/or of the Third Party provided by the Reporting Party and/or further acquired during the ensuing inquiry and investigation activities; (iii) other data that will be included by the Reporting Party in the compilation of the envelopes/supplied orally, including any reference to data relating to the Reporting Party and/or to Third Parties and reported by the Reporting Party itself or acquired in the course of the ensuing inquiry activities.

With reference to point (iii) above, the Company cannot exclude that the content of the Report also includes special data pursuant to Article 9 GDPR or personal data relating to criminal convictions and/or offences pursuant to Article 10 GDPR. In this regard, the Data Controller will process the data, for the purposes set out in this notice, pursuant to the provisions of Article 9(2)(b) GDPR or on legal obligations to which the Data Controller is subject.

### Purpose, nature of data and legal basis

The Controller will process personal data:

- a) for the purposes of preventing and containing fraudulent conduct and/or unlawful or irregular conduct, as well as for the management of Whistleblowing Reports received and, in particular, for the purposes of investigating and ascertaining the facts which are the subject of the Whistleblowing Report (and of adopting any consequent measures in compliance with the provisions of Legislative Decree 24/2023);
- b) to comply with requests by the competent public authorities and in accordance with legal formalities;
- c) for the Data Controller's internal control requirements and risk monitoring needs of the Company, as well as for the optimisation and streamlining of internal business and administrative processes;
- d) to ascertain, exercise or defend a right or legitimate interest of the Controller.

The legal basis for the processing of personal data for the purposes referred to in points a) and b) is the fulfilment of regulatory

obligations (including, among others, Legislative Decree 24/2023) and/or to comply with specific requests received from public authorities.

On the other hand, for the purposes referred to in points (c) and (d), whose basis of lawfulness is identified in the legitimate interest, the Data Controller has carried out, in accordance with the regulatory provisions, an analysis regarding the balancing of interests carried out between its own legitimate interest and the fundamental rights and freedoms of the data subject. Specifically, in relation to the purposes referred to in points c) and d), the legitimate interest of the Data Controller consists, respectively, of (i) the interest in guaranteeing the effectiveness and efficiency of the Company's internal control and risk management system also for the purpose of effectively preventing and countering fraudulent and unlawful or irregular conduct and (ii) the Data Controller's right of defence.

The provision of personal data is mandatory or, sometimes, optional. Any refusal by the data subject to provide personal data may make it impossible for the Company itself, depending on the case, to comply with applicable regulatory requirements, specific requests received from the authorities or to pursue a legitimate interest of its own, sometimes without prejudice to the activity that the Company intends to pursue (e.g. in the management of a dispute) and/or the relationship of the reporter with the same.

Any refusal to provide personal data could make it more difficult to ascertain whether the Whistleblowing Report made is well-founded, if it is not substantiated, based on precise and concordant elements, does not relate to verifiable facts and/or does not contain all the elements necessary to carry out the aforesaid ascertainment.

For Whistleblowing Reports transmitted, the confidentiality of the whistleblower's identity (as well as the content of the Report) is protected in the following ways:

- voice messaging channel at 328-6445788 which can only be accessed by members of the SB;
- with regard to letters, in the manner provided for in the Whistleblowing Procedure.

The Company also ensures the confidentiality of information relating to (i) the identity of the reported natural person (the so-called 'person involved'); (ii) the facilitator (both with reference to the identity and to the activity in which the assistance takes place); (iii) persons other than the reported person, but nevertheless implicated insofar as mentioned in the report, until the conclusion of the proceedings initiated on account of the report and in compliance with the same guarantees provided for in favour of the reporting person.

If the charge is well-founded and knowledge of the identity of the person making the report is indispensable for the accused's defence, the report will be usable for the purposes of the disciplinary proceedings only if the person making the report expressly consents to the disclosure of his/her identity pursuant to Article 12(5) and (6) of Legislative Decree no. 24/2023.

It should also be noted that the data will be communicated and processed within the organisation by staff duly appointed and instructed by the Data Controller.

#### **Transfer of personal data to a third country or international organisation**

Related processing takes place in Italy and there is no transfer or dissemination abroad or to countries outside the EEA.

However, should the need arise in the future to transfer personal data outside the territory of the EEA, the transfer will take place exclusively with the adoption of the safeguard mechanisms prescribed by the GDPR, subject to appropriate information being provided to the data subject.

#### **Modalities of data processing**

The data - where supplied and collected - will also be processed by electronic means, recorded in special digital archives, and used strictly and exclusively for the purposes indicated. They will be processed in full respect of confidentiality, including through the use of encrypted systems, and of all appropriate technical and organisational measures to ensure the security of the processing.

In the case of alerts made through the use of the oral channel, through the voice messaging system, the recording of the call will be made subject to the consent of the reporting party, which will be deemed to be explicitly provided through the continuation of the call.

#### **Data retention**

The data will be stored in a specific digital archive and protected by appropriate security measures for a period of time not exceeding the time necessary to achieve the purposes for which they are collected, and for any longer period necessary to comply with legal provisions and/or for the purposes of judicial protection, in compliance with ordinary prescriptive periods.

In particular, in accordance with the provisions of the Whistleblowing Procedure, Whistleblowing Reports and related documents and information are stored:

- for as long as is necessary for the processing of the Whistleblowing Report and in any case no longer than 5 (five) years from the date of communication of the final outcome of the Whistleblowing procedure, in any case in compliance with the confidentiality obligations enshrined in the applicable legal provisions.

Personal data that are clearly not useful and inherent to the processing of a specific Whistleblowing Report will not be collected

or, if accidentally collected, will be deleted without delay. At the end of the retention period, your personal data will be deleted or irreversibly anonymised.

### **Recipients of personal data**

The personal data may be accessed by the members of the Supervisory Board. It is understood that, in line with the principle of protection of the confidentiality of the whistleblower under Law 179/2017, the sharing of personal data will be limited to what is strictly necessary in order to guarantee the confidentiality of the whistleblower.

With specific reference to the members of the Supervisory Board as persons expressly authorised to process the Whistleblowing Report, it should be noted that in the performance of Whistleblowing Report management activities, the members of the Supervisory Board are not subject to hierarchical powers and controls and in any case have specific confidentiality obligations. The members of the SB involved in the management of Whistleblowing Reports are required to guarantee confidentiality on the existence and content of the Whistleblowing Report, as well as on the identity of the reporting persons (where disclosed), reported persons and all persons involved in the Whistleblowing Report.

The Controller may also communicate the collected personal data to:

- to third parties in fulfilment of an obligation under national or EU laws, regulations or other statutory provisions, or in response to provisions issued by authorities empowered to do so and/or in compliance with requests by such authorities;

The Data Controller takes the utmost care to ensure that the communication of personal data to the aforementioned recipients only concerns the data necessary to achieve the specific purposes for which they are intended.

In any case, personal data will not be disseminated, in any possible form.

### **Rights of the data subject**

Pursuant to Articles 15 et seq. of the GDPR, data subjects are granted certain rights, which can be exercised within the limits of their compatibility with the legislation on Whistleblowing and the provisions of Article 2-undecies of Legislative Decree No. 193/2003, namely:

<b>Right of access:</b> (Art. 15 of the Regulation)	or confirmation as to whether or not personal data relating to you are being processed and, if so, the right to obtain, inter alia, access to the personal data and information concerning the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the personal data have been or will be disclosed.
<b>Right of rectification:</b> (Art. 16 of the Regulation)	(i) rectification of inaccurate personal data concerning you without undue delay and (ii) supplementation of personal data, if incomplete.
<b>Right to erasure</b> (“right to be forgotten”): (Art. 17 of the Regulation)	deletion of personal data concerning you without undue delay (the Data Controller is obliged to delete personal data without undue delay in the cases provided for in Article 17 of the Regulation).
<b>Right of restriction of processing:</b> (Art. 18 of the Regulation)	limitation of processing in the cases referred to in Article 18 of the Regulation.
<b>Right to data portability:</b> (Art. 20 of the Regulation)	receipt in a structured, commonly used and machine-readable format of the personal data we hold about You; right to transmit such data to another data controller without hindrance from the data controller to which You have provided them in the cases referred to in Article 20 of the Regulation.
<b>Right to object to processing carried out pursuant to Article 6(1)(e) or (f):</b> (Art. 21 of the Regulation)	object, at any time, on grounds relating to your particular situation, to the processing of personal data concerning you pursuant to Article 6(1)(e) or (f), including profiling on the basis of these provisions.

Data subjects also have the right to lodge a complaint with *the Garante per la Protezione dei dati personali* (Data Protection Authority) if they consider that the processing concerning them violates the requirements of EU Regulation No. 2016/679.

As specified above, the Data Controller reserves the right to limit or delay the exercise of these rights, within the limits set out by the applicable legal provisions, in particular where there is a risk that an actual, concrete and not otherwise justified prejudice to the confidentiality of the identity of the Whistleblower may arise and that the ability to effectively verify the merits of the Whistleblowing Report or to gather the necessary evidence may be compromised.

To exercise your rights and/or request further clarification, please contact the Controller at the following e-mail address [odv@suzuki.it](mailto:odv@suzuki.it).