

PRIVACY POLICY PURSUANT TO ART 13 AND 14 OF THE EU REGULATION 2016/679

This information notice is provided by Atos Spa in relation to the processing of personal data as regards to the channel for reporting wrongdoing or irregularities known as "Whistleblowing", in accordance with the provisions of Law No. 179 of 30 November 2017, which protects those who report crimes or irregularities they become aware of in the context of a public or private employment relationship.

DATA CONTROLLER IDENTIFICATION DETAILS

The data controller is ATOS SPA with registered office in Via Passione 2 / A - 20122 Milan (MI)

Contact data:

- E-mail: info@atos.com
- Telephone: 0331/922078

PURPOSE AND PROCESSING METHOD OF THE DATA

The subscriber's data will be processed by **Atos Spa** for the following purposes:

A - implementation of the whistleblowing procedure in accordance with the legislation in force. In particular, the processing consists of the receipt and handling of the report, the verification of its validity and substantiation, and the subsequent implementation of appropriate corrective and disciplinary actions.

The Legal Basis for the processing is the fulfilment of a legal obligation to which the Data Controller is subject (Art. 6.1c GDPR).

It should be noted that specific and free consent may be requested from the reporting person (Art. 6.1a GDPR), should it be deemed for their identity to be disclosed.

The processing of your data will be based on principles of correctness, lawfulness and transparency and can be carried out through operations or multiple operations as required by articles. 5-6 of the EU Regulation 679/2016. The operations can be conducted with or without the aid of electronic or automated processes, in compliance with the security measures referred to in art. 32 of GDPR 2016/679 and as indicated in the procedure implemented by the Data Controller.

The Data Controller collects and/or receives the information provided by the reporter through the reporting channels indicated in the procedure. All reports are addressed to the Receiving Officer of the company. Following receipt of a report, the Officer records it in a special whistleblowing report register, assigning to it a unique progressive code. The identification data of the reporting party will be replaced with codes so that the report can be handled anonymously (subsequent association of the report with the identity of the reporter is possible, where allowed and only for authorised individuals). Reports received anonymously will not lead to data processing.

SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED

Disclosure of data collected as a result of whistleblowing reports may only be made to the Receiving Officer identified within the company structure and to all duly appointed persons for whom the transmission of the data is necessary in connection with the conclusion of the procedure (Board of Directors, persons employed by the company who may be useful for conducting the investigation, internal control bodies). The data may also be disclosed to external consultants appointed to investigate the reports, Institutions, Public Authorities, Judicial Authorities, Police Agencies, Investigation Agencies, Supervisory Bodies. Personal data are not subject to disclosure.

CATEGORIES OF DATA PROCESSED

The controller may process the personal data categorised as personal and contact data of the reporter together with the personal data of the reported party and of all the subjects involved, as well as special and judicial data provided directly by the reporter. Only data strictly necessary and relevant for the purposes for which they are collected will be processed.

TRANSFER OF DATA ABROAD

The Personal Data collected will be processed within the Union and may be transferred to countries outside the European Union, provided that an adequate level of protection is guaranteed, recognized by a specific adequacy decision of the European Commission. (Art. 45.2 GDPR)

Any transfers of Personal Data to non-EU countries, in the absence of an adequacy decision by the European Commission, will be possible only if adequate security guarantees are provided by the Data Controllers and Managers involved. In the absence of an adequacy decision or other appropriate measures as described above, the transfer of Personal Data to third countries outside the European Union will be carried out only in the presence of the explicit consent of the data subjects.

DURATION OF THE PROCESSING

The data retention period is set at five years from the date of communication of the outcome of the reporting procedure, in compliance with confidentiality obligations and data minimisation principles. Once these terms have elapsed, the Data will be destroyed or made anonymous.

RIGHTS OF THE DATA SUBJECT

(Art. 15-21 EU Regulation 679/2016)

At any time, the data subject may exercise his/her rights in accordance with the provisions of Articles 15-21 of the EU Regulation, namely:

1. ask for the confirmation of the existence of his/her personal data;
2. obtain information on the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be communicated to and, when possible, the retention period;
3. obtain the correction or cancellation of the data;
4. obtain the limitation of the processing;
5. obtain data portability, ie receive them from a data controller, in a structured format, commonly used and readable by an automatic device, and transmit them to another data controller without hindrance;
6. oppose to the processing at any time, also in case of processing for direct marketing purposes;
7. oppose to an automated decision-making process relating to natural persons, including profiling.
8. ask the data controller to access personal data and to correct or delete them or limit their processing or to oppose to their processing, in addition to the right to data portability;
9. withdraw the consent at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation;
10. lodge a complaint with a supervisory authority. In specific circumstances related to whistleblowing, the exercise of these rights may be restricted to protect the identity of the whistleblower. Any restrictions will be applied in accordance with the law.

The data subject may exercise their rights by sending a communication to the Data Controller at the following addresses:

- Registered letter: ATOS SPA with registered office in Via Passione 2 / A – 20122 Milan (MI)
- E-mail: info@atos.com

THE MANDATORY OR OPTIONAL NATURE OF DATA PROVISION

The provision of personal data is mandatory and necessary to ensure the correct and complete handling of the report. Refusal to provide personal data may make it impossible to complete the reporting procedure.