

Privacy Notice for the Processing of Personal Data of Whistleblowers

In accordance with Article 13 of Regulation (EU) 2016/679 (GDPR) on the protection of natural persons with regard to the processing of personal data

1. DATA CONTROLLER AND DATA PROTECTION OFFICER (DPO)

The Data Controller is Iperboreal Pharma S.r.l., with registered office at Via L'Aquila 9 – 65121, Pescara, and can be contacted at: info@iperboreal.com.

The contact details of the Data Protection Officer (DPO) are: dpo@iperboreal.com.

2. PURPOSES AND LEGAL BASES OF PERSONAL DATA PROCESSING

The personal data you provide are processed for purposes strictly related to the management of reports of any unlawful conduct regarding activities and/or behaviors that deviate from the company's implemented procedures, professional conduct standards, or ethical principles referenced by the applicable regulations, or fraudulent or unlawful behaviors attributable to employees, members of corporate bodies, or third parties.

Legal basis: The legality of this processing is based on Article 6, paragraph 1, letter c) of Regulation (EU) 2016/679 (compliance with a legal obligation to which the data controller is subject), particularly in reference to the legal obligation arising from the provisions of Article 6 of Legislative Decree no. 231/2001 as amended by Article 2 of Law no. 179/2017, entitled "Protection of employees or collaborators who report unlawful acts in the private sector", which prescribes the confidentiality of the whistleblower's identity and prohibits retaliatory or discriminatory acts, directly or indirectly, related to the report.

3. PROCESSING OF PERSONAL DATA AND METHODS

The data you provide, in order to report alleged unlawful conduct committed by individuals interacting with the company, will be:

- Processed in accordance with the principles of lawfulness, fairness, and transparency;
- Collected for the legitimate purposes described above;
- Adequate, relevant, and limited to what is necessary for the purposes for which they are processed;
- Stored in a form that allows your identification for no longer than is necessary to achieve the purposes for which they are processed;

- Processed in a way that ensures appropriate security from destruction, loss, modification, or disclosure.

If you choose not to remain anonymous, in order to manage the report and for further contact purposes, the following categories of data may be processed:

- Identifying data, address and other contact details, tax code, role;
- Special categories of data;
- Data relating to criminal convictions;
- Any other information related to the reported or whistleblower that the whistleblower chooses to share to better substantiate the report.

4. NATURE OF THE PROVISION OF PERSONAL DATA

For the indicated purpose, the provision of personal data is optional, as reports are made anonymously and the data controller will know your identity only if you choose to disclose it in the section dedicated to the report description. However, only reports with sufficiently detailed content will be considered to allow for an investigation.

5. COMMUNICATION OF PERSONAL DATA

Without prejudice to communications made in compliance with legal obligations, all data collected and processed may be communicated, if necessary, to the Judicial Authority, the Court of Auditors, and the National Anti-Corruption Authority (ANAC).

Additionally, your personal data may be communicated to the Supervisory Body (OdV), as well as to professionals appointed as data processors under Article 28 of the GDPR in areas such as compliance, risk management, Legislative Decree 231/01, digital transformation, and specialized legal professionals on matters related to the report.

6. TRANSFER OF DATA OUTSIDE THE EEA

Your personal data will not be transferred to countries outside the European Economic Area (EEA). Should the need or obligation for an extra-EEA transfer arise, it will be carried out in compliance with the conditions set out in Articles 45, 46, and 47 of the GDPR.

7. DATA RETENTION PERIOD

Your personal data and any documentation attached to the report will be retained for the time strictly necessary to achieve the purposes and in any case no later than 5 years from the date of the final outcome of the reporting procedure.

8. YOUR RIGHTS

The rights set forth in Articles 15-22 of Regulation (EU) 2016/679 (such as the right to know the data concerning you, access, update, rectification, portability, or deletion of the data, as well as the right to restriction or objection to processing) can be exercised within the limits of Article 2-undecies of Legislative Decree no. 196 of June 30, 2003.

To exercise your rights, you can simply write to the Data Controller or the Data Protection Officer at the contact details provided above.

9. COMPLAINT TO THE DATA PROTECTION AUTHORITY

We also inform you that pursuant to Article 77 of the GDPR, you have the right to lodge a complaint with the Data Protection Authority. For more information, please visit the website of the Authority:

<http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524>.