

**MATIC PLAST MILANO s.r.l.**

SEDE: VIA G. GARIBALDI, 62 – 20061 CARUGATE (MI) – ITALY  
HQ TEL. (+39) 02 2831 1325 – FAX (+39) 02 9215 0621

CAP. SOC. Euro 7.000.000,00 i.v. - R.E.A. MI N. 1926096 - REG. IMPR. MI N.06  
C.F. / P. IVA N. 06964710963 - P. IVA CEE IT 06964710963

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U.S.A.: EAST STROUDSBURG, PA 18302  
TEL. (001) 570 476 0447 – FAX (001) 570 476 0459

info@maticplast.it  
www.maticplast.com

Carugate (MI), March 27, 2026

**PRIVACY POLICY****Regarding the processing of personal data of individuals who submit reports through My Whistleblowing 2.0**

MATIC PLAST MILANO S.r.l., with registered office at Via Giuseppe Garibaldi 62, 20061 Carugate (MI), Tax ID 06964710963, acting as the Data Controller of your personal data, pursuant to Article 13 of EU Regulation 2016/679 ("European General Data Protection Regulation," hereinafter "GDPR") and Article 13 of Legislative Decree 196/2003 of the Code regarding the protection of personal data (hereinafter, the "Privacy Code") We hereby inform you that your data will be processed in accordance with the provisions of the aforementioned regulations and the confidentiality obligations set forth therein. Specifically, data processing will be based on the principles of fairness, lawfulness, transparency, and protection of confidentiality, in the manner and for the purposes indicated below.

**1. Definitions**

For the purposes of this policy, the following definitions apply:

- Personal data (hereinafter "**Data**"): any information concerning the reporter, as well as any persons involved or mentioned in the Report and Facilitators, in their capacity as a natural person who is identified or identifiable, directly or indirectly, by a name, an identification number, or one or more factors specific to their physical, economic, social, or other identity;
- Processing: any operation, performed with or without the aid of automated processes, applied to Data, such as collection, recording, extraction, consultation, communication by transmission, erasure, etc.;
- Data Controller (hereinafter also referred to simply as the "**Controller**"): the legal entity that determines the purposes and means of Data processing (in this specific case, MATIC PLAST MILANO S.r.l. is the Data Controller of your Data);
- Legitimate Interest: the interest of the Controller or of third parties that justifies the processing of the Data.



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UNI EN ISO 14001:2015 - Certificato n. 197  
UNI EN ISO 45001:2018 - Certificato n. 076  
UNI EN ISO 50001:2018 - Certificato n. 010



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## **2. Data Controller**

The Data Controller is **MATIC PLAST MILANO S.r.l.**, with registered office at **Via Giuseppe Garibaldi, 62, 20061, Carugate (MI)**, Tax ID 06964710963, represented by its current legal representative.

## **3. Data Subject to Processing**

The Data Controller processes exclusively the following Data:

- Common personal data referred to in Article 4, paragraph 1 of the GDPR pertaining to the Reporter (in the case of non-anonymous Reports) as well as any Persons involved or mentioned in the Report, such as: contact details (e.g., landline and/or mobile phone number, postal address/email address);
- Report data (location, date, subject, ...);
- Special categories of data referred to in Article 9 of the GDPR, if included in the report.

## **4. Purpose of Data Processing**

The processing of the data you provide will be used solely for the following purposes:

- handling the whistleblowing report you submitted;
- compliance with obligations under applicable law or EU regulations;
- defending or asserting a right in civil, administrative, or criminal proceedings

## **5. Legal Basis for Data Processing and Consequences of Failure to Provide Data**

The legal basis for the processing of personal data is the legal obligation arising from the provisions of Article 6 of Legislative Decree No. 231 of 2001, as amended by Law No. 179 of 2017, containing "Provisions for the protection of persons reporting crimes or irregularities of which they have become aware the context of a public or private employment relationship" and by Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019 on the protection of persons who report breaches of Union law (Whistleblowing Directive), transposed into national law by Legislative Decree No. 24 of March 10, 2023. In any case, based on the careful assessment carried out by the Data Controller, such Processing, given the purposes and methods by which it is carried out, is not likely to harm the interests, rights, or fundamental freedoms of the whistleblower; furthermore, it is a form of Processing that the whistleblower can reasonably expect in relation to the subject matter and purposes of the report made.



UNI EN ISO 9001:2015 - Certificato n. 076  
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The provision of data is necessary to achieve the purposes described above; failure to provide such data, or the provision of incomplete or inaccurate data, may make it impossible to process the report.

## **6. Methods of Data Processing and Data Retention**

In relation to the purposes indicated, the processing of data will be carried out in accordance with the provisions of the GDPR and Legislative Decree No. 196/2003, as amended. In particular, processing operations are carried out in a fair, lawful, and transparent manner, ensuring the logical and physical security and confidentiality of the data through electronic and procedural security measures. The Data will be processed both electronically and on paper. Personal data is processed using both automated and manual tools. Specific security measures are observed to prevent data loss, unlawful or improper use, and unauthorized access. The Report Management System guarantees, at every stage, the confidentiality of the Reporter's identity, of the persons involved and/or otherwise mentioned in the Report, of the Report's content, and of the related documentation, subject to the provisions of Article 12 of Legislative Decree No. 24/2023.

The Data Controller retains the Data and related documentation in accordance with and for the period specified in Article 14 of Legislative Decree No. 24/2023, namely for the time necessary to process the report and, in any case, for no longer than 5 (five) years from the date of notification of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set forth in Article 12 of Legislative Decree No. 24/2023 and the principle set forth in Article 5, paragraph 1, letter e), of Regulation (EU) 2016/679 and Article 3, paragraph 1, letter e), of Legislative Decree No. 51/2018.

Personal data that is clearly not relevant to the processing of a specific report is not collected or, if collected accidentally, is promptly deleted.

## **7. Scope of Data Communication and Disclosure**

Your personal data may be accessed by employees responsible for investigating whistleblowing reports and by the Supervisory Body established pursuant to Legislative Decree 231/2001. Furthermore, given that whistleblowing reports are submitted via the My Whistleblowing software, the provider of said application – appointed for this purpose as the data processor pursuant to Article 28 of the GDPR – may also have access to your personal data. It is understood that, in line with the principle of protecting the confidentiality of the whistleblower as set forth in



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Law 179/2017, the sharing of your personal data will be limited to what is strictly necessary to ensure your confidentiality.

Certain processing activities may be carried out by additional third parties to whom Matic Plast Milano Srl entrusts certain tasks (or parts thereof); these parties will act as independent data controllers or will be designated as data processors and essentially fall into the following categories: a) Consultants (Organizational, Litigation, Law Firms, etc.); b) Companies responsible for personnel administration and management; c) Auditing firms; d) Investigation agencies; e) Public institutions and/or authorities, judicial authorities, and law enforcement agencies.

The Data will not be disclosed.

## **8. Rights of the Data Subject**

Under certain conditions, you have the right to exercise the rights provided for in Articles 7, 8, 9, and 10 of the Privacy Code and in Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR, and, in particular, to ask us:

- access to your personal data;
- a copy of the personal data you have provided to us (so-called "data portability");
- the rectification of the data in our possession;
- the erasure of any data for which we no longer have a legal basis for processing;
- the right to object to processing where provided for by applicable law;
- the withdrawal of your consent, if the processing is based on consent;
- the restriction of how we process your personal data, within the limits provided for by data protection laws.

The exercise of these rights is subject to certain exceptions designed to protect the public interest (such as the prevention or detection of crimes) and our own interests (such as maintaining professional confidentiality). If you exercise any of the aforementioned rights, it will be our responsibility to verify that you are entitled to do so, and we will generally respond within one month.

## **9. How to Exercise Your Rights**

You may exercise the rights described in the preceding paragraph by sending a notice via:

- Registered mail with return receipt to MATIC PLAST MILANO S.r.l, Via Giuseppe Garibaldi, 62, 20061, Carugate (MI);



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- Email to a certified email address [maticplastmilano@legalmail.it](mailto:maticplastmilano@legalmail.it).

**10. Right to lodge a complaint with a supervisory authority**

You also have the right to file a complaint with the Italian Data Protection Authority if you believe that the processing of your personal data violates the GDPR.

Italian Data Protection Authority - Piazza di Monte Citorio 121 - 00186 ROME - Fax: (+39) 06.69677.3785 - Phone: (+39) 06.696771 - Email: [garante@gpdp.it](mailto:garante@gpdp.it) - Certified email: [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it)

Further information can be found on the website [www.garanteprivacy.it](http://www.garanteprivacy.it)

**MATIC PLAST MILANO SRL**

  
Giovanni Patti  
(President)



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