

1. Preamble

Atlantia SpA (hereinafter “Atlantia”), as the Data Controller pursuant to art. 13 of EU Regulation 679/2016 – the General Data Protection Regulation (the “Regulation”), wishes to inform you about the use of the personal data of whistleblowers, reported persons and any other third-parties involved (hereinafter the “data subject”), in relation to the handling of Reports governed by the Atlantia Group’s Whistleblowing Policy, to which reference should be made for further details.

To begin with, this notice solely regards instances in which the report has not been made anonymously, being cases in which data regarding the whistleblower and, eventually, the reported person have been provided.

2. Definition and types of "personal data" processed

As specified in Article 4 of the Regulation, "personal data" means *any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.*

Atlantia, through its personnel, may come into possession of the following personal data (referring to the whistleblower or, eventually, to the reported person) following receipt of a non-anonymous report:

- name and surname of the whistleblower, together with other information they may wish to provide, including a phone number, email address, postal address, etc.;
- details of the reported person that the Company may enter into the resulting online procedure to enable the report to be followed up.

3. Purposes of processing

The personal data of data subjects is processed for the purposes connected with application of the Atlantia Group’s previously mentioned Whistleblowing Policy, meaning in order to handle the reports received, investigate any allegations made and adopt the related measures.

4. Processing methods

Data is processed using an IT platform accessible from the websites of Atlantia Group companies and available at the following website: www.atlantia.it.

Data is processed for the above purposes and, in any event, in such a way as to guarantee security and confidentiality of the data. In particular, the transmission of data provided by the whistleblower via the platform is handled using the HTTPS protocol. The data is also encrypted using AES algorithms and sensitive data is fully encrypted, thereby ensuring the confidentiality of the information transmitted.

5. Storage of personal data

Personal data may be stored for a period that does not exceed the time necessary to fulfil the purposes for which it was collected and processes and, in any event, for no longer than six months following the filing of the Report after completion of the investigation and checks carried out, with the exception of cases resulting in legal and/or disciplinary action against the reported person or the whistleblower in the event of statements found to have been made in bad faith, to be false or defamatory. In such cases, the personal data may be stored until the final conclusion of the legal and/or disciplinary procedure.

6. Transfer of data overseas

With the exception of specific requirements to be agreed on case by case, any personal data provided shall not be transferred overseas.

7. Nature of the provision of data – Legal basis

Pursuant to art. 6, paragraph 1.c) and 1.f) of the Regulation, all the personal data collected as part of this process, including via third parties, is collected strictly for the purposes of meeting and ensuring fulfilment of the legal obligations of the data controller and in order to pursue the legitimate interests thereof.

8. Persons authorised to process your data – Data communication

Your personal data may be used solely by Atlantia personnel responsible for processing it (members of the Group's Ethics Officer unit, personnel in the unit's technical secretariat and of the relevant departments referred to in the Policy) and who have been assigned a specific role and who have received appropriate instructions designed to ensure confidentiality.

Your data may be communicated to law firms and external consultants or to third parties who, as external processors pursuant to art. 28, paragraph 3 of the Regulation act on the instructions of and under the control of the Data Controller:

- Unione Fiduciaria which, in the name and behalf of Atlantia, manage the IT platform used to handle whistleblowers' reports.

In addition, in view of the specific nature of the matters reported and the related significance, your data may be communicated to certain Group companies who act as independent Controllers.

9. Disclosure of data

Your data will not be disclosed to unspecified parties or published.

10. Data Controller and Data Processor and the Data Protection Officer

The data controller is Atlantia SpA, registered office via A. Nibby 20, Rome.

Atlantia has also identified and appointed a Data Protection Officer (DPO), who is the *pro tempore* head of Group Compliance and Security, domiciled for this purpose at the administrative headquarters in via Bergamini 50, 00159 Rome.

Pursuant to art. 28, paragraph 3 of the Regulation, Unione fiduciaria, which provides and manages the IT platform used for reports, is also the Data Processor.

Further details and information can be obtained by sending an email to dpo@atlantia.it.

11. Data subjects' rights

For legitimate and well-founded reasons - consistent with any existing legal and contractual obligations incumbent on the Data Controller – Atlantia acknowledges that data subjects may exercise the rights recognised in articles 15-22 of the Regulation (i.e. right of access to personal data, right of rectification, cancellation, limitation of processing, portability of personal data, opposition).

Furthermore, in the manner and within the limits provided for by the Regulation, you have the right to lodge a complaint with the Data Protection Authority pursuant to art. 77 of the Regulation.

You may exercise your rights by emailing dpo@Atlantia.it or by writing to the attention of the Data Protection Officer at the following address: via A. Bergamini, 50, 00159 Rome.

Pursuant to the provisions of art. 2-undecies of Legislative Decree 196/2003 (the Data Protection Code), Atlantia informs you that the above rights may not be exercised via a request to the Data

Controller, or in the form of a complaint pursuant to art. 77, when the exercise of such rights could effectively prejudice and compromise protection of the identity of the whistleblower who, pursuant to Law 179 of 30 November 2017, has reported a violation that they became aware of in the course of carrying out their duties.

The exercise of your rights may in any event be delayed, limited or precluded throughout the period of time in which this is necessary or proportionate, taking into account the fundamental rights and legitimate interests of the data subject, in order to safeguard the whistleblower's confidentiality.