

FURLA

NOTICE ON PERSONAL DATA PROCESSING FOR FURLA EMPLOYEES AND CODE OF ETHICS RECIPIENTS PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679 (GDPR) IN CASES OF REPORTS OF VIOLATIONS OF THE CODE OF ETHICS

DATA CONTROLLER IDENTITY AND CONTACT DETAILS

The data controller is Furla S.p.A., with registered office in San Lazzaro di Savena (Bologna) 40068 - Via Bellaria 3/5, hereafter (“**Furla**” or the “**Controller**”), in the person of its acting legal representative.

CATEGORIES OF DATA PROCESSED, PURPOSES AND LEGAL BASIS FOR PROCESSING

The procedure implemented by Furla to allow all Furla employees and Code of Ethics recipients to report events and/or behaviours that are irregular, anomalous or in contrast with the principles and policies cited in the Code of Ethics (the “**Report**”), requires the Reporter (as defined in the document “Report of Non-Compliance against Code Of Ethics” to which that notice is attached) to provide his/her identifying personal details, as well as additional data identifying the Reported Person (as defined in the document “Report of Non-Compliance against Code Of Ethics”). That Report may contain other personal data, therein including special categories of data relating to both the Reporter and the Reported Person. It may also contain personal data of any third parties who are able to confirm the facts subject to the Report.

This document (the “**Notice**”) is aimed at providing all Code of Ethics recipients (who may in future act as Reporters or be indicated as Reported Persons) with adequate transparency as to the personal data that Furla will collect in the Report, together with any other personal data that may be processed during that procedure.

In particular, the Reporter may report alleged unlawful behaviours implemented by the Reported Person, along with alleged anomalies, irregularities or violations of the principles and policies cited in the Code of Ethics perpetrated by the Reported Person, as well as alleged violations of laws and regulations. The subject of the Report (as described in more detail in the document “Report of Non-Compliance against Code Of Ethics”) must include an accurate description of the facts subject to the Report and any other useful information, as well as the personal data of the Reported Person, if known, or other elements to identify him/her. The Reporter may attach documentation and also indicate other persons who are able to confirm the facts subject to the Report or provide other useful evidence.

In particular, Furla will process the following categories of personal data, acquired by virtue of the Report and during any checks that follow the same, for the purposes specified below:

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	Categories of personal data	Purpose	Legal basis
A.	Personal details, contact details and other personal data relating to the Reporter and the Reported Person, such as data on their respective duties and roles within Furla or Furla's business partners, and any attendances or accesses to Furla's offices.	To conduct preliminary checks relating to the Report and any related investigation.	The processing is necessary to pursue the Controller's legitimate interest in verifying respect of the Code of Ethics, as well as the applicable laws and regulations, by its employees and business partners (Art. 6, par.1 letter f) GDPR).
B.	Special categories of data relating to the Reporter and the Reported Person, such as situations of invalidity/inability, sickness, pregnancy, accident, data relating to suitability for certain jobs, membership of protected categories, etc. Political opinions (e.g. data on participation in trade unions, requests for withholding of trade union association fees).	To conduct preliminary checks relating to the Report and any related investigation.	Where applicable, the processing is necessary to carry out obligations and exercise specific rights of the data controller or data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject (Art. 9, par. 2 letter b) GDPR).

If the Reporter, in the Report, indicates third parties who are able to confirm the facts subject to the Report or add other essential elements to the same, those persons will be contacted using the contact details provided by the Reporter only subject to expression of consent by the Reporter.

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MANDATORY OR OPTIONAL NATURE OF DATA PROVISION

The provision of personal data to pursue the purposes indicated in letters A and B above is necessary, and does not require consent. Any refusal to provide the requested data or the inaccuracy of the same may prevent the Ethics Committee from dealing with the Report.

PROCESSING METHODS

Your data may be processed in electronic or paper form, even by way of any Company tools used by you in providing your work performance (including computers, tablets, email accounts, telephones and attendance and access recording systems). The data will not be used for profiling purposes. A more precise definition of the methods of use and control of the Company tools and the procedures for collecting information is provided in the IT Policy on use of the Company's electronic tools, available on the intranet, which you are invited to read.

PERSONAL DATA STORAGE PERIOD

Your data will be stored at the Company's registered office and at services companies instructed by Furla for the whole duration of the Reporting procedure, therein including any Related Investigation (as defined in the document "Report of Non-Compliance against Code Of Ethics") and, thereafter, for a period not exceeding five years from the conclusion of the reporting process, subject to any longer period required to invoke the Controller's rights in any judicial proceedings of any type and level; at the end of that period, your data will be erased or anonymised.

SCOPE OF COMMUNICATION AND DISSEMINATION OF PERSONAL DATA AND TRANSFER ABROAD

The data will be accessible to employees authorised to process the same to fulfil the purposes indicated above, therein including members of the Ethics Committee who receive the Reports.

The data may also be processed by third parties, appointed by Furla as data processors, to which it entrusts the IT system maintenance and development service, for the time strictly necessary to perform that service, as well as by providers of other outsourced services, such as Furla's consultants, also for the purpose of performing investigative activity.

The data may also be communicated for exclusive purposes deriving from the outcome of the Report and where absolutely necessary also to the following categories of entities which will process them in the capacity of autonomous controllers: public administrations (such as INPS, INAIL, Territorial Employment Department), insurance companies, banks, pension and welfare funds, trade union associations (in the case of membership), also in fulfilment of specific obligations provided by law, by the national collective labour agreement or by regulations, or to carry out obligations assumed contractually, to other companies with

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which Furla holds relationships or conventions in favour of employees, to the Company doctor or to specialist external entities or institutions, legal and notary firms.

If the data are shared with data processors or communicated to third party data controllers situated in countries outside the EU territory, more specifically in Tunisia, the Controller will adopt appropriate measures to guarantee that the personal data are adequately protected in the destination location, checking that the third parties are Privacy Shield certified, have group rules approved by the competent authorities or have specific agreements with the Company, such as standard contractual clauses approved by the European Commission.

The list of those entities is constantly updated and, together with the copy of the appropriate or opportune safeguards, it is available from Furla's registered office. To obtain a copy of those data, write to the e-mail address privacy@furla.com

Your personal data will not be disseminated.

RIGHTS OF THE DATA SUBJECT

You may contact the Controller in writing, by sending a recorded delivery letter with notice of receipt to the Company's registered office or by email to the address privacy@furla.com, to exercise your rights of access, modification, erasure or objection described below, or to obtain:

- i. confirmation as to whether or not personal data concerning you are being processed, even if not yet registered, and their communication in intelligible form;
- ii. an indication of the origin of the data, the processing purposes and methods, the categories of personal data in question, the details of the Data Controller and processor, entities or categories of entities to which the data may be communicated or that may come to know of it in the capacity of processors or officers, the storage period, or, if this is not possible, the criteria used to determine it;
- iii. the update, rectification or supplementation of the data, the erasure, anonymisation or block on data processed in breach of the law, including those whose storage is not necessary in relation to the purposes for which they were collected or subsequently processed, certification that the requested operations have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except where that fulfilment is found to be impossible or involves a use of means manifestly disproportionate to the protected right.

In addition, you are entitled to request the restriction of processing concerning you and the transfer of your data to another controller (known as right to data portability), where applicable, and to object for legitimate reasons to the processing of your data, even if pertinent to the purpose of the collection.

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You also have the right to lodge a complaint with the Italian Data Protection Authority and/or other competent supervisory authorities.

CONTACT DETAILS OF DATA PROTECTION OFFICER

For all issues relating to the processing of your personal data and to exercise your rights, you may contact the data protection officer, EUCS Srls Unipersonale, Piazzale Mazzini 64, 35137 Padua, Italy, Dr. Eric Falzone, email: dpo@furla.com .