

1. Preamble

In its capacity as Data Controller pursuant to Article 13 of EU Regulation No. 679/2016 – General Data Protection Regulation (hereinafter ‘Regulation’), Atlantia S.p.A. (hereinafter ‘Atlantia’) wishes to inform you about the use of the personal data of reporting/reported subjects and any other third parties involved (hereinafter also ‘Interested Parties’), in relation to the management of the whistleblowing process regulated in the document entitled Whistleblowing Procedure, drawn up in compliance with the provisions of Italian Law no. 179/2017 "*Provisions for the protection of individuals reporting crimes or irregularities of which they have become aware in the context of a public or private employment relationship*", which should be read in full for further details.

Please note that this notice is produced only in cases where the report has been activated in a non-anonymous form, i.e., providing the reporting subject's data and, if applicable, the reported subject's data.

2. Definition and types of ‘personal data’ processed

‘Personal data’, as specified in Article 4 of the Regulation, 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*”.

Through its own staff, Atlantia may become aware, following a report made in a non-anonymous form, of the following personal data (referring to the reporting subject or, where applicable, to the reported subject):

- name and surname of the reporting subject together with any other information they may wish to provide, such as telephone number, e-mail address, postal address, etc.
- the information on the reported party that can be entered in the digital procedure specifically activated by the Company to enable the report to be forwarded.

3. Purpose of the processing

The personal data of the Interested parties is processed for purposes connected with the application of the Whistleblowing Policy, in compliance with the provisions of the aforementioned Italian Law no. 179/2017.

4. Processing methods

Data processing is carried out through the use of an IT platform accessible through the websites of the Atlantia Group Companies and available at the following web address: www.atlantia.it.

The processing shall be carried out in accordance with the abovementioned purposes and, in any case, in such a way as to ensure the security and confidentiality of the data.

5. Personal data storage

Personal data may be kept for a period of time not exceeding what is necessary for the purposes for which it has been collected and processed and, in any case, for no longer than six months from the filing of the Report following the completion of the verification and investigation activities carried out, except in the case where judicial and/or disciplinary action is taken against the reported subject or reporting subjects making statements that are in bad faith, false or defamatory; in such cases, personal data may be kept until the conclusion of the judicial and/or disciplinary proceedings.

6. Data transfer abroad

With the exception of specific needs that will be agreed from time to time, any personal data communicated will not be transferred abroad.

7. Nature of data provision

Pursuant to Article 6, paragraph 1, letters c) and f), of the Regulation, all personal data collected in the context of this processing, also through third parties, is strictly functional and necessary to fulfil a legal obligation to which the data controller is subject and for the pursuit of the legitimate interests of the data controller.

8. Persons authorised to process your data – Data communication

Your personal data may only be used by Atlantia's staff responsible for processing it (members of the Whistleblowing Team and its technical secretariat) who have been assigned a specific role and have been given appropriate instructions to ensure confidentiality.

Your data may be communicated to the following third parties, who act under the direction and control of the Data Controller as external data processors pursuant to Article 28, paragraph 3 of the Regulation:

- Unione Fiduciaria, which operates the technological platform used to manage the whistleblowing process on behalf of Atlantia.

9. Data disclosure

Your personal data will not be disclosed to unspecified recipients or published.

10. Data Controller, Data Processors and Data Protection Officer

The Data Controller is Atlantia S.p.A., with registered office in Rome, via A. Nibby 20. Atlantia has also identified and appointed a Data Protection Officer, with address for office at the operational headquarters in Via A. Bergamini, 50 - 00159 Rome, who can be reached at the following email address: dpo@Atlantia.com

Further details and information can be collected by writing an email to dpo@atlantia.it.

11. Rights of the interested party

For legitimate and well-founded reasons and compatibly with any existing regulatory and contractual obligations, Atlantia recognises the possibility of exercising the rights granted under Articles 15 - 22 of the Regulation (i.e., the right to access personal data, this latter's correction or deletion, limitation of processing, portability of personal data, opposition to the use of personal data, etc.).

Furthermore, in the ways and within the limits provided for by current legislation, you have the right to lodge a complaint with the Guarantor for the protection of personal data pursuant to Article 77 of the Regulation.

Your rights may be exercised by sending an e-mail to dpo@Atlantia.com or by writing to the Data Protection Officer at the following address: via A. Bergamini, 50 - 00159 Rome.