

The ADR Group Companies, in line with best practices and in full compliance with applicable regulations (i.e. Legislative Decree no. 231/2001, Law no. 179/2017 "Disposizioni per la tutela degli autori di segnalazioni di reati o irregolarità di cui siano venuti a conoscenza nell'ambito di un rapporto di lavoro pubblico o privato", Legislative Decree no. 24/2023 which has adopted the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law) have implemented specific internal channels for receiving and managing the reports, the regulation of which is contained in the ADR Whistleblowing Policy, which should be read in full for further details. The ADR Group Companies, acting as Data Controllers, provide this notice regarding the processing of personal data for the managing of the reports.

**PRIVACY NOTICE FOR THE REPORT OF UNLAWFUL ACTS (WHISTLEBLOWING) IN ACCORDANCE WITH ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 (GENERAL DATA PROTECTION REGULATION – "GDPR") RELEASED RESPECTIVELY BY THE ADR GROUP COMPANIES**



**DATA CONTROLLER**

The personal data of the reporting person ("Whistleblower") and/or of the person involved, of the person mentioned in the *whistleblowing* report ("Report") and the facilitator (hereinafter, the "Data Subjects") will be processed by the individual company of the ADR group (hereinafter, the "**ADR Group**"), indicated below, to which the Report is addressed, as autonomous data controller:

- **Aeroporti di Roma S.p.A.**, with registered office in via Pier Paolo Racchetti 1,- 00054 Fiumicino (Rome);
- **ADR Security S.r.l.**, with registered office in via Pier Paolo Racchetti 1,- 00054 Fiumicino (Rome);
- **ADR Assistance S.r.l.**, with registered office in via Pier Paolo Racchetti 1,- 00054 Fiumicino (Rome);
- **Airport Cleaning S.r.l.**, with registered office in via Pier Paolo Racchetti 1,- 00054 Fiumicino (Rome);
- **UrbanV S.p.A.**, with registered office in via Generale Felice Santini snc - 00054 Fiumicino (Rome);
- **ADR Ventures S.r.l.**, with registered office in via Pier Paolo Racchetti 1,- 00054 Fiumicino (Rome);
- **ADR Ingegneria S.p.A.**, with registered office in Piazza Almerico da Schio 1, 00054 Fiumicino (Rome);
- **ADR Infrastrutture S.p.A.**, with registered office in Piazza Almerico da Schio 1,, 00054 Fiumicino (Rome);
- **Leonardo Energia S.r.l.**, with registered office in via Pier Paolo Racchetti 1,- 00054 Fiumicino (Rome);
- **ADR TEL S.p.A.**, with registered office in via Pier Paolo Racchetti 1,- 00054 Fiumicino (Rome);
- **ADR Mobility S.r.l.** with registered office in via Pier Paolo Racchetti 1,- 00054 Fiumicino (Rome);

(hereinafter, individually the "**Company**" or the "**Controller**").

**DATA PROTECTION OFFICER**

- Aeroporti di Roma S.p.A., ADR Security S.r.l., ADR Assistance S.r.l., Airport Cleaning S.r.l., ADR Ingegneria S.p.A., ADR Infrastrutture S.p.A., Leonardo Energia S.r.l., ADR TEL S.p.A., ADR Mobility S.r.l. have appointed a Data Protection Officer ("DPO"), in accordance with article 37, GDPR:
- Email: [dpo@adr.it](mailto:dpo@adr.it)

- Address: via Pier Paolo Racchetti 1 - 00054 Fiumicino (Rome).

**Identification Data and contact details** (eg., first name, surname, home address, e-mail, birth date), **data concerning employment** (eg., employment, job, corporate role), **financial and economic data** (eg., information on current accounts, credit cards, sum of money, emoluments), **other personal data** (eg., images, photos, audios, voice and facts and/or acts contained in the Report) relevant to the following data subjects ("Data Subjects"): the reporting person ("Whistleblower") and/or the person involved, the person mentioned in the whistleblowing Report ("Report") and the facilitator.

The Report must not contain facts that are not relevant for the purposes of the Report. The acquisition and management of the Reports may give rise to the processing of special categories of personal data, as referred to in Article 9 of the GDPR (hereinafter also "**Special categories of data**", i.e. those from which it can be eventually presumed, inter alia, racial and ethnic origin, philosophical and religious beliefs, party or trade union membership, as well as state of health, sexual life or sexual orientation), as well as **data relating to criminal convictions and offences** referred to in Article 10 of the GDPR, only where unavoidable and necessary for the purposes of the Report itself.

Identification data of the Whistleblower will not be collected if an anonymous report is made which contains the essential elements required by the *whistleblowing* procedure.

In accordance with current legislation, the Data Controller guarantees the secrecy of the identity of the Whistleblower and of the other persons protected by the legislation, and does not use the reports beyond what is necessary to follow them up adequately. The identity of the Whistleblower and any other information from which this identity may be inferred, directly or indirectly, will not be disclosed without the Whistleblower's express consent to persons other than those competent to receive or follow up the reports. At the same time, in line with the relevant legislation, the Data Controller ensures the secrecy of the identity of the reported person and does not allow the undue circulation of personal information. This person does not have the right to be always informed of the report concerning them, but only within the scope of any proceedings initiated against them following the conclusion of the management of the report and in the event that such proceeding is based in whole or in part on the report.

**TYPES OF PROCESSED DATA**



**PURPOSE OF THE PROCESSING**



**LEGAL BASIS**



**DATA RETENTION PERIOD**



**PROVISION OF PERSONAL DATA**

1.

Purposes connected with the receipt and management of the Report of any fraudulent and/or unlawful or irregular conduct relating to the internal control and risk management system in accordance with the Whistleblowing Policy

Legal obligation pursuant to article 6(1) letter c) GDPR

Five (5) years with effect from the completion of the verification of the facts set out in the Report for those that are well-founded and to which it is decided to follow up.

Without prejudice to the possibility provided for by the Whistleblowing Policy of forwarding anonymous reports, it should be noted that the provision of personal data will be managed by the Data Controller solely for the purpose of fulfilling the

	<p>(violations of the Code of Ethics, of the 231/01 Organizational Model, mobbing practices, thefts, frauds, etc.), including activities of investigation and internal enquiries connected with the verification of the conducts reported and the performance of the preliminary investigation as set out in the ADR Whistleblowing Policy.</p>			<p>specific legal obligations relating to the management of Reports, in compliance with the protection measures provided for by Legislative Decree No. 24 of 10 March 2023 (the "Decree") in favour of the Data Subjects.</p> <p>In line with the provisions of the relevant legislation and guidelines, personal data that are manifestly not useful for the processing of a specific report will be erased.</p> <p>The guarantees applicable according to the criteria and modalities set out in the relevant legislation remain unaffected.</p>
<p><b>2.</b></p>	<p>Purposes connected with the needs to defend rights in the course of judicial, administrative or extrajudicial proceedings and in the context of litigations arising in connection with the Report made. In addition, Personal Data may be processed by the Data Controller for the purpose of taking legal action or making claims.</p>	<p>Legitimate interests pursuant to article 6(1) letter f) GDPR</p>	<p>For the time necessary to prosecute the legal action or to pursue the protection of one's right.</p>	<p>In this case, no new and specific provision is required, since the Controller will pursue this further purpose, where necessary, by processing the Personal Data collected for purpose No. 1, which is deemed compatible with this one.</p>
<p>As stated above, the Report must not contain "Special categories of personal data", except where this is unavoidable and necessary for the purposes of the Report itself. In this case, the prerequisite for the lawfulness of the processing of such data is based on articles 9(2) letter b) and 88 of the GDPR in relation to the purpose no. 1, and on article 9(2) letter f) of the GDPR in relation to the purpose no. 2. With regard to any "data relating to criminal convictions and offences", the condition of legitimacy is to be found under article 2-<i>octies</i> of Legislative Decree 196/2003, as amended and supplemented ('Privacy Code') and article 10 of the GDPR, in the fulfilment of the legal obligations under the Decree.</p>				
	<p><b>HOW TO SEND REPORTS</b></p>	<p>In line with what is provided in the Whistleblowing Policy to which reference is made, Reports may be made through the following channels:</p> <ul style="list-style-type: none"> <li>By accessing the platform at <a href="https://www.adr.it/web/aeroporti-di-roma-en/whistleblowing-gruppo-adr">https://www.adr.it/web/aeroporti-di-roma-en/whistleblowing-gruppo-adr</a> (the "Platform"). Both written and oral Reports can be made within the Platform thanks to its built-in functionalities. Within the platform, a telephone number is also available +39 028114800081 which allows to forward vocal Reports. The platform's functionalities, also through the use of cryptography tools, ensure the protection of the confidentiality of the reporter's identity;</li> </ul>		

		<ul style="list-style-type: none"> <li>• postal mail addressed exclusively to the Team Segnalazioni and delivered, in line with company policy, in a sealed envelope (as delivered by the postal service) only to persons authorised to process of the ADR Team Segnalazioni;</li> <li>• e-mail address <a href="mailto:segnalazioni.adr@adr.it">segnalazioni.adr@adr.it</a> which can only be accessed by authorised persons such as members of the Team Segnalazioni.</li> </ul> <p>Outside the Platform, the personal data of the Reports may be processed, at the request of the Whistleblower, through a direct meeting with the Team Segnalazioni or through the additional external channels provided for by the Decree.</p> <p>Reports made orally in the course of a meeting requested by the Whistleblower, with the Whistleblower's prior consent, will be documented in minutes pursuant to Article 14 of Legislative Decree No. 23/2024.</p> <p>The Whistleblower consents to the recording, pursuant to Article 14 of Legislative Decree No. 23/2024, when proceeding with the process to make Reports via a recorded telephone line or recorded voice messaging system.</p>
	<p><b>PROCESSING METHODS</b></p>	<p>Data are processed in compliance with the regulations in force by means of manual, IT and electronic tools, with logic strictly related to the above-mentioned purpose, so as to guarantee the security and confidentiality of the data. Data may be processed by means of technological, IT and/or paper tools and by means of suitable IT tools (e.g. software, hardware, applications). In this regard, the Data Controller has protocols, controls and procedures to ensure the confidentiality of the data of the Data Subjects and is constantly committed to adopting, pursuant to article 32 of the GDPR, specific technological and organisational measures to protect the data from the risk of loss, unlawful or incorrect use and unauthorised access, including the adoption of cryptography techniques. In particular, the transmission and retention of data provided by the Whistleblower through the Platform is managed through tools and protocols designed to guarantee the confidentiality of the identity of the Whistleblower at all stages of the process (e.g. no persistent cookies for the tracking of users are installed, no cookies are configured, there is no log book, etc.). The platform ensures computerised management of reports also through the use of cryptography tools.</p>
	<p><b>DATA RECIPIENTS</b></p>	<p>Access to personal data will be allowed only to the Team Segnalazioni and to persons authorised pursuant to articles 29 GDPR and 2-<i>quaterdecies</i> of the Privacy Code. The personal data contained in the reports received will be disclosed only to the personnel in charge of processing them: <i>i)</i> the Team Segnalazioni and the Technical Secretariat thereof to whom a specific role has been assigned and to whom have been given adequate instructions committing them to confidentiality; <i>ii)</i> the Supervisory Body pursuant to Legislative Decree 231/2001 of the ADR Group company concerned by the report is authorized to know the identity of the Whistleblower for reports relevant to the Model pursuant to Legislative Decree 231/01 and where it deems necessary.</p> <p>Subsequently, in the phase of checking the validity of the Report, where this is necessary for the purposes of the investigative activities, personal data may be forwarded, in compliance with the principle of confidentiality, to the specially authorised staff of the Data Controller. More detailed information on the Report management process and the persons involved can be found in the ADR Whistleblowing Policy.</p> <p>In addition, personal data may be communicated, where necessary and the prerequisites are met, to Public Authorities (including administrative, judicial and public security authorities).</p>

		<p>Data related to Reports concerning ADR Security S.r.l., ADR Assistance S.r.l., Airport Cleaning S.r.l., ADR Ingegneria S.p.A., ADR Infrastrutture S.p.A., Leonardo Energia S.r.l. ADR TEL S.p.A., ADR Mobility S.r.l., ADR Ventures S.r.l. e UrbanV S.p.A. will be processed by ADR S.p.A., acting as Data Processor pursuant to article 28 GDPR, to which the Companies have entrusted – acting as an external entity – the management of the reporting channels.</p> <p>It should be noted that the supplier of the EQS Group Platform has been designated as Data Processor pursuant to article 28 of the GDPR by ADR and acts as sub-processor of the other ADR Group Companies that have entrusted the management of the reporting channels to ADR S.p.A. as external party and Data Processor pursuant to article 28 of the GDPR.</p> <p>The full list of the recipients of personal data of the Data Subjects, including more details on the location of the recipients, is kept at the Data Controller's headquarters and can be consulted upon request by the Data Subject at the following address <a href="mailto:dpo@adr.it">dpo@adr.it</a>.</p>
	<p><b>DATA TRANSFER OUTSIDE THE EU</b></p>	<p>Personal data will be processed within the European Economic Area (EEA) and stored in servers located within the EEA. In the event that access to the data is required, albeit on a contingent basis, by parties established in countries outside the European Union (EU) or the EEA, such access, which may constitute a transfer outside the EEA, will in any event take place in compliance with the provisions of Chapter V of the GDPR.</p>
	<p><b>RIGHTS OF THE DATA SUBJECT</b></p>	<p>Data subjects may exercise, at any time, towards the Controller, the rights provided for in Articles 15 et seq. of the GDPR in relation to the processing of their personal data, such as, for example, the right of access, to rectification or integration, erasure, restriction of processing and object to processing by sending a request to Reporting Team through the Platform or by writing to the email address <a href="mailto:segnalazioni.adr@adr.it">segnalazioni.adr@adr.it</a> or to the attention of the Reporting Team via postal mail: Via Pier Paolo Racchetti, 1 00054 Fiumicino (RM).</p> <p>These rights may be restricted pursuant to and for the purposes of article 2-undecies (1) letter f) of Legislative Decree No. 196/2003, as amended and supplemented (Privacy Code), where the exercise of such rights may result in concrete and actual prejudice to the confidentiality of the identity of the person who reports violations of which they have become aware by reason of their employment relationship or functions performed, pursuant to the applicable legislation.</p> <p>In such cases, the rights of the Data Subject may also be exercised through the Italian Data Protection Authority (the "Garante") in the manner set out in Article 160 of the Privacy Code. In such cases, the Garante shall inform the Data Subject that it has carried out all the necessary checks or that it has conducted a re-examination, as well as of the right of the data subject to file a judicial appeal.</p>
	<p><b>RIGHT TO FILE A COMPLAINT TO THE AUTHORITY CONTROL</b></p>	<p>If the Data Subject considers that their personal data have been processed unlawfully, they have the right to file a complaint with the Italian Data Protection Authority as provided for in article 77 of the GDPR, using the references available on the website (<a href="https://www.garanteprivacy.it/web/garante-privacy-en/home_en">https://www.garanteprivacy.it/web/garante-privacy-en/home_en</a>) or to appeal to the appropriate legal branches.</p>
	<p><b>EXISTANCE OF AN AUTOMATED DECISION-MAKING</b></p>	<p>Personal data collected will not be subject to an automated decision-making.</p>

