

## WHISTLEBLOWING NOTICE

In accordance with EU Regulation 2016/679 (hereinafter “GDPR”) and applicable laws, and pursuant to the company procedure on the use of internal reporting channels adopted in compliance with Legislative Decree No. 24 of March 10, 2023 (hereinafter the “Decree”), implementing EU Directive 2019/1937 on Whistleblowing, we provide you with the following information regarding the processing and protection of your personal data.

### Data Controller

The Data Controller is PANORA S.p.A., Fraz. Ponte Ghiara No. 8/a, VAT No. 01691680340, email: [privacy@panoraseeds.com](mailto:privacy@panoraseeds.com)

### Data Processed and Collection Methods

Pursuant to the Decree, the Controller has established the following internal reporting channels:

- Global Hotline software platform (written channel);
- Voicemail system (oral channel); and/or, subject to the Data Subject’s consent, a direct meeting with the Report Manager.

These channels allow the data subject to report alleged unlawful conduct and/or violations of which they become aware during their professional activity for the Controller, as outlined in the Decree. The reported violations and misconduct will be handled by the Report Manager, who, based on the Whistleblowing Procedure (also available on the website <https://www.panoraseeds.com>), will carry out the appropriate investigations and provide feedback to the whistleblower.

### Types of Data Collected

The personal data processed may be of a “general” or “special” nature and may relate to the whistleblower, the reported person, and other individuals involved or connected to the reported facts.

Personal data may include (but is not limited to): identification data, contact details, information on job title/position, and any other relevant data related to the alleged misconduct. Depending on the nature of the report, the processing may involve special categories of personal data as per Articles 9 and/or 10 of the GDPR.

Authorized personnel involved in receiving the report may also request supporting documentation, always in compliance with the principle of data minimization (Article 5(1)(c) GDPR).

In the event of a direct meeting with the data subject, the Report Manager may request consent to record and/or document the meeting.

### Purpose and Legal Basis

The processing aims to allow the Controller to establish internal channels for reporting possible unlawful conduct and violations pursuant to Article 3 of the Decree and to manage and properly follow up on such reports (Article 12(1) of the Decree).

The legal basis for processing lies in the need to comply with legal obligations imposed on the Controller by the Decree, which legitimizes processing under Article 6(1)(c), Article 6(2)-(3), Article 9(2)(b), Articles 10 and 88 of the GDPR.

With the whistleblower’s prior consent, their identity may be disclosed to parties other than the Report Manager (Article 12(2) of the Decree).

Also with the whistleblower’s consent, their identity may be disclosed if the report, even if submitted anonymously, is found to be wholly or partially substantiated and such disclosure is necessary to allow the reported individual to defend themselves before competent bodies (Article 12(5) of the Decree).

### Panora S.p.A.

Frazione Ponte Ghiara 8/A – 43036 Fidenza (PR) Italy Tel. +39 0524528439 – e-mail: [info@panoraseeds.com](mailto:info@panoraseeds.com)  
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[www.panoraseeds.com](https://www.panoraseeds.com)

The internal channels used by the Controller guarantee the confidentiality of the whistleblower's identity through data encryption and in accordance with the principles of privacy by design and by default (Article 25 GDPR).

All information and personal data are collected in compliance with the data minimization principle (Article 5(1)(c) GDPR).

### **Recipients**

Personal data will not be publicly disclosed and may only be communicated to legally required entities and/or the competent Judicial Authority as stipulated by the Decree.

### **Retention Period**

Reports and any related documentation will be retained in accordance with Article 14 of the Decree:

“Internal and external reports, along with any related documentation, shall be kept for as long as necessary to process the report and, in any case, no longer than five years from the date of the final outcome communication.”

After this period, the report and any related personal data will be destroyed or anonymized, in compliance with applicable technical procedures for deletion and backup.

### **Data Subject Rights**

Data subjects may exercise the rights provided for in Articles 15 to 22 of the GDPR. However, these rights may be restricted if their exercise would compromise the confidentiality of the whistleblower's identity. The data subject may always request full information about the data processing and their rights by contacting the Controller at the details provided above, subject to the limitations described.

### **Withdrawal of Consent**

The data subject may withdraw their consent at any time for the processing related to the disclosure and/or communication of their identity to parties other than the Report Manager, or its disclosure for the purpose of allowing the reported person to defend themselves.

Such withdrawal must be communicated in writing to the Data Controller and shall not affect the lawfulness of processing carried out prior to the withdrawal.

### **Right to Lodge a Complaint**

If the data subject believes that the processing of their data violates the GDPR, they have the right to lodge a complaint with the Italian Data Protection Authority via the contact details available at: <https://www.garanteprivacy.it>

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