

Sede Legale:  
Via Trebazio, 3 | 20145 Milano - Italy  
Sede Amministrativa:  
Via Salvo D'Acquisto, 8- 22078 Turate (Co), Italy  
**T** +39 0331 311.399  
**F** +39 0331 311.529  
PEC: [beautynova@legalmail.it](mailto:beautynova@legalmail.it)

**PRIVACY POLICY PURSUANT TO ART. 13 OF EU REGULATION 2016/679**

**For "reporting persons" and any "facilitators" pursuant to Legislative Decree n. 24 of 2023 (implementing the so-called "Whistleblowing Directive")**

*"on the protection of persons who report breaches of Union law and laying down provisions on the protection of persons who report breaches of national law"*

We take data protection very seriously, and we would therefore like to inform you about how your data is processed and the rights you can exercise under current data protection legislation, in particular EU Regulation 2016/679 (hereinafter also referred to as "GDPR").

**1. Data controller and DPO****Beautynova S.p.A.**

Via Trebazio n. 3

20145 Milano (MI)

E-mail: [privacy@beautynova.com](mailto:privacy@beautynova.com)**Data Protection Officer (DPO)**

Vera Cantoni, Solicitor

Via Turati 26, 20121, Milano (MI)

E-mail: [dpo@beautynova.com](mailto:dpo@beautynova.com)**2. Categories of processed personal data**

The categories of "personal data" (ex-Art. 4.1 of the GDPR) processed by the Data Controller may include, by way of example but not limited to:

- Biographic and identification data (name, date of birth, place of birth, nationality, tax code, VAT number, occupation/profession, etc.);
- contact details (address, e-mail address, telephone number and similar data);
- information acquired as a result of the report, including, but not limited to, information on the work and/or professional activity carried out, work or professional relationships, even indirect, with the reported person or persons involved, circumstances and reasons why the Data Subject became aware of the suspected breaches of regulatory obligations;
- any special data relating to the report of certain types of offences or violations, if the Data Subject is the victim of such offences or is an injured party in this context (by way of example and without limitation: health data in the case of reports of crimes and other offences related to accidents at work, if the Data Subject is the victim of the accident);
- with reference to the "facilitator", the processing will concern exclusively identification, personal and contact data, as well as data relating to relations with the reporting person, with reference to working relationships, and those relating to the assistance provided to the latter.

**3. Lawfulness and purposes of processing**

Personal data is processed in accordance with the provisions of the General Data Protection Regulation (GDPR) and any other applicable data protection legislation. Details are provided below:

**3.1 Purposes aimed at fulfilling a legal obligation (ex-Art. 6, par. 1(c) of the GDPR) and Art. 9, par. 2(b) of the GDPR)**

- Fulfilment of obligations under laws, regulations and EU legislation, with particular reference to those provided for by Legislative Decree No. 24 of 2023 and, more generally, in relation to the protection of individuals who report violations of EU law and national regulations (so-called 'whistleblowing' legislation).

The retention period for personal data, in relation to the purposes referred to in this section, is:

For purpose: a, for the time necessary to process the report and in any case no later than 5 years from the date of communication of the final outcome of the reporting procedure.

These times may be extended in the event of litigation, investigations by public or judicial authorities, or any special legal provisions.

**4. Recipients or categories of recipients of personal data (ex-Art. 13(1)(e) of the GDPR) \***

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Within the scope of the above purposes, the Data Controller may communicate your data to:

- Internal offices and departments of the Data Controller, specifically responsible for managing the report, as well as, in relation to and limited to the Reporter, any offices involved in taking appropriate disciplinary measures against the reported party, subject to the Reporter's specific and free consent;
- Any external parties entrusted with the management of the reporting channel;
- Companies and professional operators that provide IT services, including, for example, software and cloud management;
- Control and supervisory bodies of the Data Controller, where necessary for the performance of their control activities;
- With regard to the reporting person, law firms, if the follow-up to the report involves the initiation of legal proceedings in which it is necessary to reveal the identity of the reporting person;
- With regard to the reporting person, persons involved in disciplinary or reporting proceedings, if this is essential for the defence of the accused or the person involved, subject to the latter's specific and free consent;
- Judicial authorities and/or public supervisory authorities;
- Other public administrations and public authorities.

*\* Further information on the Recipients (pursuant to Article 4.9 of the GDPR) is available from the Data Controller at the above addresses.*

**5. Recipients or categories of recipients of personal data (ex-Art. 13(1)(f) of the GDPR) and transfer of data to countries outside the EU**

The Data Controller informs you that it does not intend to transfer your data to countries outside the EU and the EEA for the purposes indicated above.

**6. Rights of the data subject (ex-Art. 13(2)(b) of the GDPR)**

The Data Subject may exercise the following rights, specifying that **they cannot be exercised if their exercise could result in actual and concrete prejudice to the confidentiality of the identity** of reporting persons and facilitators, as provided for in Article 2-undecies, paragraph 1, letter f) of the Privacy Code and that, in any case, they may be exercised only in cases where **they do not conflict with the obligations** of the Data Controller in relation to the requirements of **Legislative Decree n. 24 of 2023**, referred to above:

- right of access by the Data Subject [Article 15 of the EU Regulation] (the possibility of being informed about the processing of their Personal Data and, where applicable, receiving a copy thereof), within the limits provided for by the EU Regulation, including those listed below;
- right to rectification of one's Personal Data [Art. 16 of the EU Regulation] (the Data Subject has the right to rectify inaccurate personal data concerning him/her);
- the right to erasure of their Personal Data without undue delay ("right to be forgotten") [Art. 17 of the EU Regulation] (the Data Subject has, and will have, the right to erasure of their data), in the cases provided for by the GDPR and limited to any residual cases that may arise in the context of the processing in question, taking into account that the Data Controller is required to retain the data in question for the time necessary to manage the report and in any case for no longer than 5 years;
- right to restriction of processing of their Personal Data in the cases provided for in Art. 18 of the EU Regulation, including in the case of unlawful processing or contestation of the accuracy of the Personal Data by the Data Subject [Art. 18 of the EU Regulation];
- right to data portability [Article 20 of the EU Regulation], the Data Subject may request their Personal Data in a structured format in order to transmit it to another data controller, in the cases provided for in the same article;
- right to object to the processing of their Personal Data [Article 21 of the EU Regulation] (the Data Subject has, and will have, the right to object to the processing of their personal data);
- right not to be subject to automated decision-making [Art. 22 of the EU Regulation] (the Data Subject has, and will continue to have, the right not to be subject to a decision based solely on automated processing).

Further information about the rights of the Data Subject can be obtained on the company website or by requesting a full extract of the above articles from the Data Controller.

The above rights may be exercised in accordance with the provisions of the Regulation by sending an e-mail to the following address [privacy@beautynova.com](mailto:privacy@beautynova.com), specifying that the Data Subject may exercise the right of access, referred to in Art. 15, limited to their personal data and excluding, therefore, personal data relating to the subjects reported or persons involved,

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without prejudice to the provisions regarding the obligation to respond to the report, pursuant to the aforementioned legislative decree, containing the communication relating to the follow-up to the report itself.

In accordance with Article 19 of the EU Regulation, the Data Controller shall inform the recipients to whom the personal data have been disclosed of any rectifications, erasures or restrictions on processing requested, where possible.

In order to allow for a more rapid response to your requests made in the exercise of the above rights, they may be addressed to the Data Controller at the contact details indicated in point 1.

#### 7. Right to lodge a complaint (ex-Art. 13(2)(d) of the GDPR)

If the data subject believes that their rights have been compromised, they have the right to lodge a complaint with the Data Protection Authority, in accordance with the procedures indicated by the Authority itself at the following Internet address: <http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524> or by sending a written communication to the Data Protection Authority.

#### 8. Possible consequences of failure to provide data and nature of data provision (ex-Art. 13(2)(e) of the GDPR)

##### 8.1 In the case of compliance with legal or contractual obligations

Please note that with regard to the above purpose, unlike other processing purposes that have a legal obligation as their legal basis, the data subject provides their personal data freely and voluntarily.

Therefore, with regard to the processing operations mentioned above, it is specified that the **provision of personal data will be free, optional and voluntary**, following a spontaneous initiative by the data subject, although such provision of data may remain **at least in anonymous form**, necessary for the Data Controller to proceed with the management of any reports and to fulfil the related legal obligations to which it is subject (**therefore, it is not absolutely necessary, in this regard, to send the reporting person's identification data or other information that, even indirectly, reveals their identity**). We also inform you that, after sending the report and providing the related data, the Data Subject **cannot revoke such provision and/or request the deletion** of the related data communicated (**with the exception of any requests for the deletion of data that may be stored beyond the period indicated in section 3.1 above**). For the sake of completeness, we inform you that only the managers or recipients of the reports have the prerogative to assess the data provided in the reports as irrelevant or erroneous, and that this prerogative does not belong to the reporter, with the consequences that this may have on the exercise of the right to deletion. The reporting party may, however, provide any information and comments they deem appropriate in order to reveal the aforementioned errors and/or contribute to the aforementioned revelations. Furthermore, for the avoidance of doubt, it is reiterated, as stated above and in other documents of the Data Controller, that the information and data sent with the report may not contain any identifying information about the reporting person, nor any other information that could be used to identify them. If such information is contained in the reports, the identity of the reporting person may be disclosed to persons other than the managers of the reports, only in the cases provided for by Legislative Decree 24 of 2023 and subject to the consent of the reporting person.

Failure to give consent or partial consent may prevent the performance of activities, with reference to the individual purposes for which consent is denied.

When the data is no longer necessary, taking into account the retention periods indicated above, it is regularly deleted.

#### 9. Existence of automated decision-making (including profiling)

The use of purely automated decision-making processes as detailed in Article 22 of the GDPR is currently excluded. If, in the future, it is decided to establish such processes for individual cases, the Data Subject will be notified separately if required by law or by an update to this policy.

#### 10. Methods of processing personal data

Personal data will be processed mainly, if not exclusively, in computerised and telematic form and stored in the specific area of the dedicated platform for the management of reports, which can be accessed, and therefore become known to, the persons in charge of managing the reports, expressly designated by the Data Controller as Data Processors or Authorised Persons for the processing of personal data, who may exceptionally process the data, if deemed appropriate by such persons, even on removable or paper media (with the specific measures provided for by the Data Controller), without prejudice to the use of additional necessary media (used by the Data Controller and its law firms) in the event of disciplinary proceedings and litigation, **within the limits indicated in paragraph 4**. These persons may carry out consultation, use, processing, comparison and any other appropriate operation, including automated operations, in compliance with the provisions of the law necessary to ensure,

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among other things, the confidentiality and security of the data as well as the accuracy, updating and relevance of the data with respect to the stated purposes.

This policy and subsequent updates are made available by the Data Controller, who reserves the right to publish them on its website, and may be requested at the above addresses.