

INFORMATION NOTICE - “WHISTLEBLOWING”

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 27 APRIL 2016

Pursuant to and for the effects of article 13 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on free movement of such data, and repealing Directive 95/46/EC (“General Data Protection Regulation” or simply “Regulation” or “GDPR”), we inform you that ITALO - Nuovo Trasporto Viaggiatori S.p.A. (ITALO) collects and processes Your personal data in compliance with data protection law in force and, in any case, in accordance with the principles of confidentiality that our Company is inspired by.

In compliance with Law n.179 / 2017 on whistleblowing, ITALO ensures the confidentiality of the identity of the whistleblower, also to protect him/her from any retaliation and / or discrimination that may occur.

1. Categories of personal data processed

Italo will process the following categories of Personal Data provided by the whistleblower reporting potential crimes / irregularities / unlawful conducts:

- Personal Data such as, for example, name, surname, mobile phone, e-mail.

Moreover, in the fulfillment of specific legal obligations related to the management of the business relationship with its employees (such as, for example, mandatory communications to the competent Authorities) ITALO may process particular categories of data ex art. 9 and 10 of the GDPR.

2. Purposes of the processing activities and legal basis

Your Personal Data will be processed by ITALO in order to:

a) manage the reports concerning crimes / unlawful conducts in compliance with Law n. 179/2017 which regulates whistleblowing.

We remind You that the provision of Your personal data is mandatory. Your eventual refusal and / or the provision of inaccurate and / or incomplete information would make it impossible for ITALO to take charge of your report and to follow up the same.

Legal basis of the processing activity referred to in point a) is the legitimate interest pursued ITALO ex article 6, first comma, letter f) of GDPR, that is the inspection, exercise and defense of ITALO’s rights with reference to its responsibilities pursuant to Legislative Decree 231/2001.

3. Methods of the processing activities

In relation to the purposes indicated, Your personal data will be processed by suitable paper-based, electronic and/or Web-based instruments with logic strictly related to the

aforesaid purposes and, in any case, such as to ensure data security and confidentiality.

4. Recipients or categories of recipients of the personal data

Members of the Board of Directors, the Data Protection Officer and, in any case, the Data Processors and all persons acting under the authority of the Data Controller, authorized to processing activities, may be aware of Your personal data during the execution of their duties.

Your Personal Data may be communicated to any qualified entities that provide ITALO services necessary for the above-mentioned purposes, such as, for example, parent companies, subsidiaries, affiliates, entities, institutions and / or companies that manage and / or participate in the management and / or maintenance of websites and electronic and / or telematic tools used by ITALO; suppliers, contractors, subcontractors, banking and / or insurance companies, consultants who assist ITALO with particular reference to legal, tax, administrative, organizational issues; Police Forces or Judicial Authorities in investigations for the purposes of prevention, detection or repression of crimes; any other party to whom the Data must be communicated on the basis of a specific legal provision.

Your personal data may be transferred abroad, in accordance with applicable law, where the Company pursues its own interests. Personal Data transfer to countries outside the EU, in addition to cases in which this is guaranteed by Commission Adequacy Decisions, is carried out in such a way as to provide appropriate safeguards pursuant to art. 46, 47, 49 of the GDPR.

5. Duration and criteria used to determine the period for which the personal data will be stored

5.1 Duration

For the purposes referred to in paragraph 2 "Purposes of the Processing activities" of this information notice, your Personal Data will be processed only for period strictly necessary to achieve the same purposes for which these data were collected.

5.2 Retention period

Personal Data will be stored according to the following criteria:

- Data processed for the purposes referred to in point a) of paragraph 2 "Purposes of the Processing activities" of this information notice, will be stored for the period of time required by current legislation, possibly extended for the time necessary to assert any rights of ITALO in court.

6. Data subject's rights

We would like to inform You that in every moment You could exercise Your rights according to Articles 15-22 of GDPR.

To exercise Your rights, You can contact the Data Controller at privacy@ntvspa.it. To Your request, the Company will give You a feedback without delay within 30 days.

In relation to the Personal Data processed in connection with this Privacy Notice, in any time You are entitled to:

- Access to the Personal Data (Art. 15 UE GDPR 2016/679), including the right to obtain a copy of the Personal Data concerning You, provided that the rights and freedoms of others are not infringed;
- Rectification (Art. 16 UE GDPR 2016/679);
- Erasure (Art. 17 UE GDPR 2016/679);
- Restriction of processing (Art. 18 UE GDPR 2016/679);
- Data Portability, understood as the right to obtain from the Data Controller the Data in a structured, legible and use friendly format via an automatic device in order to transmit them to another Data Controller without hindrance, if technically feasible and guaranteeing the utmost confidentiality of Data Subject in accordance with reference *whistleblowing* legislation (Art. 20 UE GDPR 2016/679);
- Object to the processing, (Art. 21 UE GDPR 2016/679).

Please note that pursuant to Art. 77 UE GDPR 2016/679 You can lodge a complaint with the Data Protection Supervisory Authority in the event of a violation of current Data Protection Legislation, according to the procedures and instructions published on the Data Protection Supervisory Authority official website www.garanteprivacy.it.

7 Data Controller, Data Processor and Data Protection Officer

The Data Controller is ITALO - Nuovo Trasporto Viaggiatori S.p.A., with registered office in Casilina, no. 1, 00182 Rome, Italy, in the person of Legal Representative *pro tempore*. Any request relating to the personal data processed by ITALO - Nuovo Trasporto Viaggiatori S.p.A. may be sent to the Company's registered office or to its email privacy@ntvspa.it.

The updated list of Data Processors is made available by the Company and may be obtained upon a specific request submitted as detailed above.

The Data Protection Officer's contacts is dpo@ntvspa.it

This privacy disclaimer could be updated. Italo invites You to periodically visit this page in order to know how does Italo process Your Data.

This is an English courtesy translation of the original documentation prepared in Italian language. Please consider that only the original version in Italian language has legal value.

Data Controller
ITALO - Nuovo Trasporto Viaggiatori S.p.A.