

ANNEX 2 - INFORMATION NOTICE CONCERNING THE PROCESSING OF PERSONAL DATA RELATED TO SIGNED REPORTS

Information notice pursuant to Art. 13 of the (EU) Regulation 2016/679 as subsequently integrated and amended (the “GDPR”), and the Italian and European laws that integrate it as subsequently integrated and amended (“Applicable Privacy Law”) – processing of personal data related to qualified reports.

Telespazio S.p.A. (hereinafter, the “Company” or the “Data Controller”), as Data Controller, in relation to your personal data acquired as part of the management of the reports referred to in the “**Whistleblowing Management Guidelines**” (“Reports”), made available on the Company’s website, hereby provides the following information.

1. Data controller and data processors

1.1. The Data Controller is Telespazio S.p.A., with registered office in Via Tiburtina , 965 - 00156 Rome, email: titolare.data.protection@telespazio.com.

1.2. The Company’s Surveillance Body acting in its quality of autonomous Controller for the processing of personal data in accordance with the provisions of the Legislative Decree 8th June 2001, n. 231.

1.3. The Data Controller has appointed a Data Protection Officer (DPO), as provided for by the GDPR, with the task of monitoring, supervising and providing specialist advice in the field of data protection, who may be contacted, for any necessary support, at the following e-mail address: data.protection.officer@telespazio.com.

2. Categories of personal data processed

2.1. The processing concerns the personal data acquired through the receipt of your Report and within the scope of the “Whistleblowing Management Guidelines”. The data collected concern, *inter alia*, the personal data of the author of the Report, that allow to identify him/her (the “Data Subject”), as well as the content of the statement made hereby.

2.2. The Data Controller may process, in accordance with the Applicable Privacy Law, data belonging to particular categories referred to in Art. 9 of the GDPR, for the purposes indicated in paragraph 3.1 below, upon specific prior consent of the Data Subject, pursuant to Art. 9, paragraph 2, letter a) of the GDPR.

3. Legal basis and purposes of the processing

3.1. The personal data of the Data Subject shall be processed by the Data Controller, in compliance with the Applicable Privacy Law, for the following purposes:

(i) Management of Reports received by the Data Subjects, in accordance with the “Whistleblowing Management Guidelines”, and for all and any purposes related to the management process set forth by the “Whistleblowing Management Guidelines”, including, without limitation, defensive purposes, internal control of the Company and monitoring of business risks, implementing the provisions set forth in the aforementioned document, the employment contract, the Ethic Code, as well as the related corporate protocols and applicable laws;



(ii) Mention of the initiative taken by the employee, upon his/her prior consent, in his/her personal file, accompanying the professional experience gained and the individual career path, should the report be qualified in accordance with the “Whistleblowing Management Guidelines”.

3.2. The personal data of the Data Subjects shall be processed for the purposes indicated in point 3.1 above through the acquisition of specific prior consent, pursuant to and for the purposes of Articles 6, letter a), 7 and 9, paragraph 2, letter a) of the GDPR, depending on whether common data or data belonging to particular categories are concerned.

3.3. It is also acknowledged the legitimacy of anonymous Reports, in such respect, the consent to the processing of personal data required for the purposes referred to in paragraph 3.1 above is optional and failure to provide it shall only cause that the Data Controller is not entitled to process personal data for the purposes referred to in paragraph 3.1 above.

4. Modalities of the processing

4.1. The processing of the personal data of the Data Subjects shall be carried out in accordance with the modalities and guarantees set forth by the Applicable Privacy Law, and shall be carried out with automatic and/or manual systems, suitable to guarantee the security of the processing.

4.2. Personal data shall be processed by the Data Controller through its duly authorized personnel, - by the Company’s Surveillance Body, and the Board of Statutory Auditors, acting in their quality of autonomous controllers for the processing of personal data, by the Reports Committee referred to in the “Whistleblowing Management Guidelines” and by Leonardo’s Surveillance Body and by Leonardo’s Group Internal Audit and Security Organizational Units only to the extent necessary and on the basis of specific indications of the Data Controller, ensuring, in any case, the confidentiality of the data provided.

4.3. The processing of the personal data of the Data Subjects shall, in any case, take into account the principles of proportionality and necessity, according to which unnecessary personal data shall be neither processed nor collected; the principle of loyalty and transparency, according to which adequate communication shall always be ensured to the Data Subjects, and take place in compliance with the requirement of adequacy of the security measures.

5. Scope of communication and dissemination of personal data

5.1. For the purposes described in the paragraph 3 above, the personal data may be communicated to the corporate bodies of the Company, to the personnel of the Company appointed for this purpose, as well as to external counsels in order to activate the judicial and/or disciplinary protection related to the Report too. In addition, the data may also have to be communicated to police and judicial authorities.

5.2. The data of the Data Subjects shall be neither disseminated nor transferred to third countries outside the European Union and to international organizations.

6. Rights of the Data Subject

6.1. With regard to the personal data held by the Data Controller, the Data Subject may exercise all and any rights provided for by the Applicable Privacy Law, and namely, the Data Subject may:



- a) ask the Data Controller to confirm the existence of his/her personal data, the origin of such data, the ground and purposes of its processing, the categories of subjects to whom the data may be communicated, as well as the identification details of the Data Controller and the relevant data processors;
- b) request access to your personal data, transformation into anonymous form, blocking, correction, updating, integration, cancellation of such data or the limitation of their processing;
- c) oppose the processing of personal data, for any reason connected to your particular situation, within the limits set forth by the Applicable Privacy Law:
- d) exercise the right to portability, within the limits set forth by Art. 20 of the GDPR;
- e) withdraw his/her consent at any time, without prejudice to the lawfulness of the processing based on consent given prior to withdrawal;
- f) lodge a complaint with the Italian DPA, following the procedures and indications published on the official website (www.garanteprivacy.it).

6.2. Any modification or cancellation or limitation to the processing carried out upon Data Subject's request or withdrawal of the consent - unless this is not impossible or involves a disproportionate effort - will be communicated by the Data Controller to each of the recipients to whom the personal data have been communicated. The Data Controller may notify the Data Subject of these recipients upon his/her request.

6.3. For the purposes of exercising the rights referred to in paragraph 6.1 above, as well as for any clarifications, the Data Subject may contact the Company's Surveillance Body directly, by sending an email to the following address: odv@telespazio.com.

7. Data retention

The personal data transmitted by the Data Subjects shall be stored for the time strictly necessary for the purposes referred to in point 3 above, and, in any case, shall be deleted after 10 years from their transmission.



**PROCESSING OF PERSONAL DATA
(pursuant to the Applicable Privacy Law)**

Having examined the above information notice, and without prejudice to my right to revoke my consent at any time, the undersigned, having read and acknowledged the content of the above information notice, pursuant to and for the purposes of Art. 6 and 7 of the GDPR and the Applicable Privacy Law,

I agree I do not agree

on the processing of my personal data for the purposes referred to in point **3.1** of the above mentioned information notice and, in particular, for the management of Reports received by Data Subjects, in accordance with the “Whistleblowing Management Guidelines”, and for any other purpose connected with the procedure provided for by the aforesaid “Whistleblowing Management Guidelines”, including, without limitation, defensive purposes, internal control of the Company and monitoring of business risks, implementing the provisions of the aforementioned document, the employment contract, the Ethic Code, as well as the related corporate protocols and applicable laws. Furthermore, pursuant to and for the purposes of Art. 6, 7 and 9, paragraph 2, letter a) of the GDPR and the Applicable Privacy Law,

I agree I do not agree

on the processing of my personal data, belonging to special categories under Art. 9 of the GDPR, which I may provide with the Report according to the modalities and for the purposes referred to in paragraph **3.1** of the above mentioned information notice, and, in particular, for the management of Reports received by Data Subjects, in accordance with the “Whistleblowing Management Guidelines”, and for any other purpose connected with the procedure provided for by the aforesaid “Whistleblowing Management Guidelines”, including, without limitation, defensive purposes, internal control of the Company and monitoring of business risks, implementing the provisions of the aforementioned document, the employment contract, the Ethic Code, as well as the related corporate protocols and applicable laws.

Date

The Data Subject