PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA
within the Company's system for reporting violations – whistleblowing
pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 of 27 April 2016
General Data Protection Regulation

By means of this document, **Leonardo CAE Advanced Jet Training S.r.l.**, with registered office at the Decimomannu Military Base, SS 196, KM 4, 09034, Villasor (hereinafter, the "Company"), as Data Controller, intends to provide appropriate information on the processing of personal data carried out within the Company's system for reporting and managing violations (so-called "**whistleblowing**"), implemented in compliance with the applicable whistleblowing legislation.
The main reference provisions are:

- Legislative Decree No. 24 of 10 March 2023 implementing EU Directive No. 1937 of 23 October 2019 (the "**Whistleblowing Decree**");
- the requirements set out in the Guidelines and other guidance documents adopted by the Italian National Anti-Corruption Authority (A.N.A.C.);
- Article 6(2-bis) of Legislative Decree No. 231 of 8 June 2001, concerning the administrative liability of companies and entities;
- at European level, the national laws implementing Directive (EU) 2019/1937;
- Regulation (EU) 2016/679 – General Data Protection Regulation (the "**Regulation**");
- Legislative Decree No. 196 of 30 June 2003 – Personal Data Protection Code (the "**Privacy Code**").

Reports will be handled in accordance with the procedure entitled "Procedure JPR-CM-02", made available on the Company's website (hereinafter, the "**Whistleblowing Procedure**"), which we invite you to read carefully.
This privacy notice, set out below, concerns the processing of the personal data of the reporting person and, where applicable, the data of the person concerned by the report and of the various persons involved in the report and/or in the facts to which it relates.

a) <u>Identity and contact details of the Data Controller</u>

The Data Controller of the personal data collected and processed as part of the procedure for receiving and managing whistleblowing reports is **Leonardo CAE Advanced Jet Training S.r.l**., with registered office at the Decimomannu Military Base, SS 196, KM 4, 09034, Villasor.

b) <u>Categories of personal data processed and source of the data</u>

As part of the procedure for receiving and managing reports, in accordance with the applicable whistleblowing legislation, personal data relating to the reporting person, the person concerned by the report and other categories of data subjects, such as persons involved in and/or connected with the reporting process and/or the facts covered by the report, will be processed.
Such information may include ordinary personal data (e.g. identification and contact details, data relating to the data subject's work activities, other data contained in the report and/or in the documentation attached to it or collected during the report-handling process, etc.) and, insofar as strictly necessary for the purposes of processing described below, special categories of personal data (Article 9 of the Regulation, e.g. data concerning health, trade union membership, data capable of revealing the data subject's racial or ethnic origin, political opinions, religious or philosophical beliefs, etc.) or data relating to criminal convictions and offences (Article 10 of the Regulation).
Personal data will be collected directly from the data subject or from third parties, through the report submitted in accordance with the procedures set out in the Whistleblowing Procedure and in the attached documentation, or acquired during the report-handling procedure.
Providing data by submitting a report is voluntary; however, without such data, the Company may be unable to receive and handle the report. You are asked to provide only the data necessary to describe the facts covered by the report, avoiding any personal data that is not necessary for this purpose. The identity of the reporting person will be protected from the receipt of the report and throughout every subsequent stage.

c) <u>Purposes and legal basis of the processing</u>

Personal data will be processed for the purpose of handling reports and adopting the resulting measures in fulfilment of legal or regulatory obligations relating to *whistleblowing*.

The legal basis for the processing is the need to comply with the obligations imposed by whistleblowing legislation (Articles 6(1)(c), 9(2)(b) and 10 of the Regulation).
Where a report is submitted orally (during a meeting with the person appointed to handle reports), the Company will ask the reporting person for consent to any recording or transcription of the oral report.
Furthermore, if it becomes necessary to disclose the identity of the reporting person, or any other information from which that identity may be directly or indirectly inferred, to persons other than those competent to receive or follow up on reports, the Company will ask the reporting person for their express and specific consent.
Consent will be voluntary and may be freely withdrawn at any time in accordance with the procedures indicated when consent is requested.

d) Methods of processing personal data

Personal data will be processed using paper-based means (or electronic/IT means in the event of consent to the recording of any oral reports), in such a way as to ensure their security and confidentiality and, through the necessary technical and organisational security measures, prevent unauthorised persons from identifying the reporting person, in compliance with the applicable legal provisions, the requirements set out in the A.N.A.C. Guidelines and the Whistleblowing Procedure.
Please also note that reports may be submitted anonymously (see Section 4.1.2 of the Whistleblowing Procedure); however, anonymity cannot be guaranteed where a request is made by the Judicial Authority or other authorities vested with coercive powers.

e) Recipients of personal data

Personal data will not be disseminated. Within the limits of their respective responsibilities and as described in the Whistleblowing Procedure, with particular regard to the restrictions on access to the identity of the reporting person and of the other persons whose identity and confidentiality must be protected by law, personal data will be processed within the Company, subject to authorisation to process such data (Article 29 of the Regulation and Article 2-quaterdecies of the Privacy Code), by the members of the Whistleblowing Committee, the body appointed to manage Reports (the "**Report Manager**").
Furthermore, depending on the circumstances, the data may be processed by: (**i**) the person responsible for any disciplinary proceedings brought against the person concerned by the report; (**ii**) personnel or bodies whose involvement is necessary for the handling of the report or the adoption of the resulting measures (e.g. the Supervisory Body); (**iii**) external legal or tax advisers, or advisers specialising in the subject matter of the report received. Details of the parties appointed, where necessary, as Data Processors (Article 28 of the Regulation) will be provided upon request sent to the contact details set out below.
Furthermore, the report and personal data may be transmitted, within the scope of their respective responsibilities and as provided for by law, to A.N.A.C., the Judicial Authority, the Court of Auditors and any other public authorities involved, which will process the data as independent Data Controllers.

f) Transfer of personal data outside the EU

Personal data will not be transferred to countries outside the European Union.

g) Retention period for personal data

Personal data will be processed for the time strictly necessary to handle the report at all its stages, adopt the resulting measures and fulfil the related legal obligations, and in any event for no longer than 5 years from the date on which the final outcome of the Whistleblowing Procedure is communicated, in compliance with the confidentiality obligations laid down by law. Thereafter, the data will be deleted or anonymised, unless their retention is necessary (i) to protect the Company's rights, in judicial or out-of-court proceedings, and/or (ii) to respond to requests from the Judicial Authority or other public authorities involved.

h) Data subject rights

By sending a letter marked "Confidential – for the Whistleblowing Committee of Leonardo CAE Advanced Jet Training S.r.l. c/o Leonardo CAE Advanced Jet Training S.r.l." to the address Decimomannu Military Airport, SS 196 km 4, 09034 Villasor (CA) – Italy, the data subject may exercise, within the limits provided

for by the Privacy Code (Article 2-undecies), the rights set out in Articles 15 to 22 of the Regulation, including, in summary, the right to:

- *obtain confirmation as to whether or not personal data concerning them are being processed;*
- *obtain access to their personal data and to the information referred to in Article 15 of the Data Protection Regulation;*
- *obtain, without undue delay, the rectification of inaccurate personal data concerning them or the completion of incomplete personal data;*
- *obtain, without undue delay, the erasure of personal data concerning them;*
- *obtain restriction of the processing of personal data concerning them;*
- *be informed of any rectification or erasure of personal data or restriction of processing carried out in relation to their personal data;*
- *receive or transmit to another Data Controller, in a structured, commonly used and machine-readable format, the personal data concerning them.*

The full list of data subject rights is available at www.garanteprivacy.it.www.garanteprivacy.it
Data subjects are informed that the above rights may not be exercised by submitting a request to the Company, or by lodging a complaint (see the following section), where the exercise of such rights could result in actual and specific prejudice to the confidentiality of the reporting person's identity (Article 2-undecies of the Privacy Code). In such cases, the rights may be exercised in accordance with the law, including by requesting specific investigations by the Italian Data Protection Authority (Article 160 of the Privacy Code).

i) Complaint to the Supervisory Authority

If the data subject believes that the processing of their personal data infringes the provisions of the Regulation, they may always lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it), or with the supervisory authority of the country in which they habitually reside, work or where the alleged infringement occurred.

j) Data Protection Officer (DPO)

The Data Protection Officer (DPO) appointed by the Company may be contacted at the following e-mail address: dpo@advancedjettraining.com.

THE COMPANY