INFORMATION NOTICE CONCERNING THE PROCESSING OF PERSONAL DATA, PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 ("GDPR") RESULTING FROM THE SYSTEM ADOPTED BY THE COMPANY TO COLLECT REPORTS REGARDING UNLAWFUL CONDUCT OR VIOLATIONS OF THE ORGANISATION, MANAGEMENT AND CONTROL MODEL PURSUANT TO LEGISLATIVE DECREE 231/2001 AND REPORTS PROVIDED FOR BY LEGISLATIVE DECREE 24/2023

	DATA CONTROLLER	**D-Orbit S.p.A.** Address: Viale Risorgimento 57, 22073 - Fino Mornasco, Como, Italy E-mail address: info@dorbit.space (hereinafter also referred to as the '**Company**' or '**Holder**').
	DATA PROTECTION OFFICER (DPO)	**Partners4Innovation** Address: Via Copernico 38, 20125 Milan, Italy E-mail address: dpo@dorbit.space

TYPE OF DATA PROCESSED AND DATA SOURCE

The Company allows detailed written or oral reports of:

- unlawful conduct of an administrative, accounting, civil or criminal nature, also pursuant to Italian Legislative Decree 231/2001;
- violations of the Company's internal provisions, such as:
  - Organisation, Management and Control Model adopted by the Company pursuant to Legislative Decree 231/2001;
  - Code of Ethics;
  - National collective agreements and, more generally, internal regulations (procedures, policies, operating instructions, etc.);
- violations of European provisions consisting of:
  - acts and omissions affecting the financial interests of the Union;
  - acts and omissions affecting the internal market;
  - acts and conducts that frustrate the object or purpose of the provisions of Union acts in the areas mentioned above;
  - violations of national and European provisions consisting of offences in - but not limited to - the following areas:
    - public procurement;
    - financial services, products and markets and the prevention of money laundering and terrorist financing;
    - safety and conformity of products;
    - transport security;
    - environmental protection;

in a digital manner through its 'whistleblowing platform'.

	Reports can be **named or anonymous**: – in the case of anonymous reports, the company's IT systems **will not be able to identify the whistleblower** from the portal access point (IP address); – in the case of written or oral and nominal whistleblowing reports, at the whistleblower's choice, the whistleblower's personal data shall be associated with the report. In the form made available in the "*whistleblowing platform", the whistleblower* may indicate their personal data, in the case of nominal reports (specifically, personal details and contact details), information relating to the relationship with the Data Controller, the circumstances and description of the matter reported, and the personal data of the whistleblower and/or of any third parties (hereinafter the "**Data**"). The '*whistleblowing platform*' also allows the *whistleblower* to make a transcript of the voice report in *Speech-to-Text* mode in *real-time* (without recording), subject to the express consent of the whistleblower. The Data of the whistleblower, if any, are provided directly by the whistleblower (and therefore acquired by the Controller from the data subject pursuant to Article 13 of the GDPR); the Data of the whistleblower and/or third parties are provided by the whistleblower (and therefore acquired by the Controller from third parties pursuant to Article 14 of the GDPR). In addition, in the context of this activity, special data (e.g. health-related data) and judicial data (in particular, data relating to criminal offences) may also be processed if they are directly provided by the whistleblower. These are not, in fact, categories of data that are mandatory for the purpose of sending the report.

 **PURPOSE OF PROCESSING**	 **LEGAL BASIS FOR PROCESSING**	 **DATA RETENTION PERIOD**
Handling of circumstantiated reports of unlawful conduct or violations of the Management Model, made in written and oral form, including investigative activities aimed at verifying the lawfulness of the facts reported and the adoption of the consequent measures in accordance with the provisions of the Management Model/offences and/or irregularities of within the framework of relations pre-contractual, contractual, probationary period with the Controller or after the termination of the legal relationship if the information on the violations was acquired during the course of the same legal relationship as provided for in Italian Legislative Decree 24/2023.	The Data are processed to fulfil a legal obligation to which the Data Controller is subject pursuant to Italian Legislative Decree no. 231/2001, as amended by Law no. 179/2017 as well as EU Directive no. 2019/1937 as implemented by Legislative Decree no. 24/2023, art. 6 (1) c) of the GDPR. The processing, if any, of special categories of data is based on the fulfilment of obligations and the exercise of specific rights of the Controller and of the data subject in matters of labour law pursuant to Article 9(2)(b) of the GDPR. Any data relating to criminal convictions and offences will only be processed in cases where this is required by law pursuant to Art. 10 GDPR. The transcription of the voice report will be made with the express consent of the whistleblower, pursuant to	The Data shall be stored for as long as necessary for the processing of the report and, in any case, no longer than 5 years from the date of the communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set out in Article 12 of Italian Legislative Decree No. 24/2023 and the principle set out in Article 5(1)(e) of the GDPR. Should the report lead to the initiation of litigation or disciplinary proceedings against the reported person or the whistleblower, the Data shall be retained for the duration of the litigation or extrajudicial proceedings until the expiry of the time limit for appeal.

	Article 14 of Italian Legislative Decree No. 24/2023.	
If necessary, to ascertain, exercise or defend the Controller's rights in court.	Legitimate interest of the Controller pursuant to Article 6(1)(f) of the GDPR. Any special data categories will be processed for the purpose of establishing, exercising or defending a right in court pursuant to Article 9(2)(f) of the GDPR. Data on criminal convictions and offences, if any, will only be processed in cases where this is required by law pursuant to Article 10 GDPR.	The Data will be retained for the duration of the legal proceedings or until the expiry of the time limit for appeal.
After the aforementioned retention periods have elapsed, the Data will be destroyed, deleted or anonymised, subject to the technical procedures of deletion, backup and accountability of the Data Controller.		

OBLIGATION TO PROVIDE DATA

The provision of data is optional.

In particular, if the whistleblower's identification data are not provided, the report will be rendered anonymous. The information contained in the report (e.g. the circumstances and the description of the fact being reported with reference to the whistleblower and/or third parties) is necessary to enable the Data Controller to acquire, manage and initiate any preliminary investigation phase pursuant to Legislative Decree 231/01 as amended and Legislative Decree 90/2017 as amended and Legislative Decree 24/2023.

Special categories of data and/or judicial data are not required by the Controller and may be processed, if sent by the whistleblower, only if the conditions listed above are met. If these conditions are not met, they will be deleted immediately.

MEANS OF PROCESSING

The processing of the Data, with reference to both written and oral reports, shall take place by means of paper, electronic or automated tools ("Whistleblowing platform") with logics related to the purposes indicated above and, in any case, in such a way as to guarantee the security and confidentiality of the Data. Specific security measures are observed to prevent the loss of Data, unlawful or incorrect use and unauthorised access. In cases where a face-to-face meeting is requested by the whistleblower, the meeting will be documented, subject to consent, by the staff by means of a report.

RECIPIENTS OF DATA

The Data may be communicated to parties acting as Data Controllers such as, by way of example, judicial authorities and other public entities entitled to request such data, as well as persons, companies (including those belonging to the D-Orbit Group), associations or professional firms providing assistance and consultancy on the matter in compliance with the confidentiality obligations set out in Article 12 of Italian Legislative Decree no. 24/2023.
The Data are also processed, on behalf of the Data Controller, by the supplier managing the '*Whistleblowing platform',* to whom appropriate operational instructions are given, specifically appointed as Data Processor pursuant to Article 28 of the GDPR.
In exceptional cases, should the Company initiate disciplinary proceedings against the reported person based solely on the report, the whistleblower's Data may be disclosed to the reported person, solely for the purpose of enabling the latter's right of defence to be exercised, in compliance with the confidentiality obligations set out in Article 12 of Italian Legislative Decree no. 24/2023.
The identity of the whistleblower and of the persons named in the report are protected until the conclusion of the proceedings instituted on account of the report, in accordance with the same guarantees provided in favour of the whistleblower.

SUBJECTS AUTHORISED TO PROCESS

Data may be processed by the members of the Direct Channel and by the internal D-Orbit instructors involved in the handling of reports, who act on the basis of specific instructions as to the purposes and methods of processing and who will only be involved in cases strictly necessary, taking care to preserve the absolute confidentiality of the data subjects.

DATA TRANSFER TO NON-EU COUNTRIES

There are no transfers of data outside the European Economic Area (EEA), as far as the processing in question is concerned.

RIGHTS OF THE DATA SUBJECT - COMPLAINT TO THE SUPERVISORY AUTHORITY

By contacting the Company by e-mail at dpo@dorbit.space, data subjects may request from the Controller access to the data concerning them, their deletion in the cases provided for by Article 17 GDPR, the rectification of inaccurate data, the integration of incomplete data, the restriction of processing in the cases provided for by Article 18 GDPR, as well as opposition to processing, for reasons related to their particular situation, in cases of legitimate interest of the Controller.

In the case of a face-to-face meeting, at the whistleblower's request, the minutes (drawn up with the whistleblower's consent) may be verified, corrected and confirmed by the whistleblower by his signature.

In the case of an oral report through the platform, the whistleblower's express consent to the transcript will be required, which is made through the Speech-to-Text mechanism in real time. Before sending the report, the whistleblower may verify, rectify or confirm the content of the transcript.

Data subjects have the right to lodge a complaint with the competent Supervisory Authority in the Member State where they habitually reside or work or in the State where the alleged infringement occurred.

	Pursuant to Article 2-*undecies* of Italian Legislative Decree No. 196/2003, as amended by Italian Legislative Decree No. 101/2018 (hereinafter, the "**Code**"), the rights set out in Articles 15 to 22 of the GDPR cannot be exercised if the exercise of such rights may result in actual and concrete prejudice to the confidentiality of the identity of the employee who reports unlawful conduct of which he/she has become aware by reason of his/her office. In such a case, the rights in question may be exercised through the Supervisory Authority (in the manner set out in Article 160 of the Code), which informs the data subject that it has carried out all the necessary checks or has carried out a review, as well as the data subject's right to appeal.