








**Reporting of concerns - "whistleblowing".
INFORMATION PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679**

	Data Controller KIKO S.p.A., with registered office in Bergamo via Giorgio e Guido Paglia n. 1/D, cap. 24122 P. Iva 02817030162 - C.F. 12132110151 - Tel. 035-280011 ("Company").
	DATA PROTECTION OFFICER (DPO) E-mail address dpo.kiko@kikocosmetics.com
	PERSONAL DATA PROCESSED Name and surname of the sender together with other information that the sender wished to provide such as telephone number, email address, postal address, etc. as well as information about the individual provided by the sender.

	SOURCE OF THE DATA The personal data being processed are provided by the "whistleblower", which is, the person who originates the report, to which are added those data that may already be available to the Company or which are collected in the context of the activities aimed at verifying the validity of the complaint and what is described therein, always in compliance with the provisions of law.
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 PURPOSE OF THE PROCESSING	 LEGAL BASIS FOR PROCESSING	 PERIOD OF RETENTION OF DATA
<p>Personal data are collected and processed for the purposes strictly related to the verification of the validity of the reports received and for the management of the same, with regard to activities and/or behaviour that deviate from the procedures implemented by the Company.</p> <p>In particular with regard to the violation of the principles of ethics referred to by current legislation - internal and external - and/or illegal or fraudulent conduct related to employees, members of the corporate bodies, companies of the KIKO Group or third parties (customers, suppliers, consultants, collaborators), which can determine - directly or indirectly - an economic, patrimonial and/or image damage.</p>	<p>Legitimate interest of the Company, pursuant to art. 6, paragraph 1 - f) of the GDPR, to counter any unlawful conduct, for example related to violations of the Code of Ethics of the company.</p>	<p>Personal data will be kept for a period of time no longer than necessary for the purposes for which they were collected and processed and in any case for no more than five years from the filing of the report following the completion of the verification activities and deepening conduct, except where legal and/or disciplinary proceedings are instituted against the person or persons who have made false or defamatory statements in bad faith; in such cases, personal data may be stored until the final conclusion of the judicial and/or disciplinary proceedings.</p>
<p>After the above retention periods, the data will be destroyed, deleted or anonymized.</p>		



RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Internal access to personal data processed in the context of the investigation of alerts is strictly allowed on the basis of the need to have knowledge, which remains subject to the need to obtain access.

In particular, personal data could be communicated to natural persons - appointed subjects authorized to process personal data - with regard to the data necessary for the accomplishment of the tasks entrusted to it and belonging to the following categories: employees or seconded persons, temporary employees, interns belonging to the function of Global Audit and those other functions of the company necessary to conduct the investigation associated with the complaint received.

The data collected may be communicated to the subjects to whom this communication must be made in compliance with a legal obligation, a regulation or Community legislation, where this is required, for example, for any subsequent criminal proceedings or if the complainant made a false declaration.



TRANSFER OF PERSONAL DATA TO NON-EU COUNTRIES

There are no data transfers outside the European Union.



RIGHTS OF THE DATA SUBJECT

The GDPR recognises and guarantees specific rights, including the right to know what data pertaining to the data subject (as a reporter, reported, witness, etc.) in the possession of the Company for the whistleblowing reporting process, as well as how they are used and to obtain, when the conditions are met, the deletion, as well as the updating, rectification or, if there is interest, the integration of the data.

The rights of the interested party (in particular, the person indicated) may be limited pursuant to and for the effects referred to in art. 2-undecies, first paragraph read. f) of Legislative Decree no. 2003/196, as amended by Legislative Decree no. 2018/101, and in accordance with art. 23 of EU Regulation 2016/679, if the exercise of the above rights can result in a concrete and effective prejudice to the confidentiality of the identity of the reporter.

The assessment of the necessity of the limitation of the rights of the data subject is referred to the Data Controller, which makes use of the functions competent in the matter.

In this case, the Data Controller must provide reasoned communication without delay to the interested party of the rejection/delay/limitation/exclusion of the request to exercise the rights indicated above, without prejudice to the provisions of art. 2-undecies comma 3 of D.Lgs. 2003/196, as amended by D.Lgs. 2018/101.

In the event that access to a data subject's personal information is granted, the personal information of third parties such as reporters, alerts or witnesses must be removed from the documents, except in exceptional circumstances (whether the reporters authorise such disclosure, whether this is required by any subsequent criminal proceedings or whether the reporter has made an intentionally false statement).

DETAILED RULES FOR THE EXERCISE OF RIGHTS

To exercise the rights described in the previous paragraph, the interested party can contact: dpo.kiko@kikocosmetics.com.

The deadline for reply is one (1) month, extendable by two (2) months in cases of particular complexity; in such cases, the Company shall provide at least one interim communication within one (1) month of receipt of the request.

COMPLAINT OR REPORT TO " GUARANTOR FOR THE PROTECTION OF PERSONAL DATA "

The interested party has the right to lodge a complaint or make a report to the Guarantor for the Protection of Personal Data or, alternatively, to appeal to the Judicial Authority. The contact details of the Guarantor for the Protection of Personal Data can be found on the website <http://www.garanteprivacy.it>.