

PRIVACY INFORMATION NOTICE
pursuant to Article 13 of (EU) Regulation 2016/679
in relation to "Whistleblowing" reports

With this information notice, the Data Controller Thales Alenia Space Italia S.p.A. with registered office in Via Saccomuro n. 24 - 00131 Rome (also the "Company"), that can be contacted by registered mail at the aforementioned registered office or by certified email at the pec address thalesaleniaspaceitalia@pec.it, illustrates how the data collected in the context of Whistleblowing reports shall be processed and which are the rights recognized to the interested party pursuant to the protection of personal data in accordance with (EU) Regulation 2016/679 (hereinafter, "GDPR"), as well as Legislative Decree 196/2003 and subsequent amendments ("Privacy Code").

In certain specific cases, conditions may arise for a co-ownership with the parent company Thales (SA), which can be contacted by registered mail with return receipt at the registered office in Rue de la Verrerie 4, 92190 Meudon, France, when the whistleblower's report constitutes supplementary information on the subject matter of fraud, corruption, or influence peddling or when, with the written consent of the whistleblower, the report is transferred to Thales (SA) due to a conflict of interest risk, gravity, or complexity of the report, or due to a structural problem within the Thales Group.

1. Data Protection Officer

The Data Controller employs a DPO - Data Protection Officer or Group Data Protection Officer, who can be contacted at the following email address to ensure the exercise of the interested parties' rights dataprotection@thalesgroup.com.

2. Data Processing Purposes

In compliance with the legal obligations provided for by Legislative Decree. 24/2023 on whistleblowing (hereinafter, "Whistleblowing Decree"), personal data processing is solely intended for the management of reports - including any necessary preliminary investigation to assess their truthfulness and legitimacy - as well as the resulting actions, (including any judicial protection in court), submitted in reference to the alleged illegal conduct of which the whistleblower has become aware by reason of his or her work, duty, or supply relationship with the Data Controllers.

In particular, "report" means any communication received by the Data Controller - through the internal channels established by the same - concerning the violation of provisions of national or European Union regulations harming the public interest or the integrity of the public administration or private entity, of which the whistleblower has become aware in a public or private work context. Such reports may specifically concern violations of internal and external regulations governing the activity of the Data Controller, of the principles and rules of conduct contained in the Code of Ethics, as well as of the provisions contained in the Data Controller's Model 231 and/or illegal or fraudulent conduct referable to employees, managers, members of the corporate bodies or third parties (customers, suppliers, consultants, collaborators), which may directly or indirectly result in economic-financial loss and/or image damage for the Data Controller.

3. Type and Source of Processed Data

The personal data processed, such as personal data (e.g., first name, last name, date and place of birth) and contact data (e.g., landline and/or mobile telephone number, postal/e-mail address, aliases) and special data pursuant to Article 9 of the GDPR (where mentioned in the report) or relating to criminal offenses or safety measures, pursuant to Article 10 of the GDPR (where referred to in the report), may be acquired

- directly from the whistleblower, if he or she sends the report through the internal channel set up for this purpose, with the exception when requested, of guaranteeing the anonymity of the report and the possibility of re-contacting the whistleblower in a protected manner;
- at third parties

The personal data subject to processing may concern the whistleblower, the facilitator, the person potentially affected by the report and/or other persons involved in the report and may as well be contained in files or documents enclosed or attached to the report itself.

4. Legal Grounds for Processing

Personal data processing, within the scope of the described purposes referred to in point 3. above, is contained in the fulfillment of legal obligations under Legislative Decree 24/2023, in compliance with the obligations under Italian and EU law, as well as in the legitimate interest of the Data Controller, where necessary to undertake judicial or contractual protection toward the reported person or the whistleblower, in the presence of the relevant legal prerequisites, as well as to conduct quality audits related to the processes by means of which reports are handled.

The provision of the data is necessary for the achievement of the abovementioned purposes; failure to provide, partial or inaccurate provision of the data may result in the inability to handle the report.

5. Data Processing Methods

Data processing is carried out manually and/or by means of automated computerized and telematic tools for purposes strictly related to the above-mentioned scope and, in any case, in such a way as to guarantee security and confidentiality. The reporting management system guarantees, at every stage, the confidentiality of the identity of the whistleblower, the persons involved and/or in any case mentioned in the report, the content of the report and related documentation, with the exception of what provided in Article 12 of Legislative Decree No. 24/2023.

In particular, the Data Controller, in accordance with the provisions of Legislative Decree No. 24/2023, has provided for the following internal reporting channels that allow whistleblowing reports to be sent via:

- **Dedicated IT Platform:** that may be accessed at the following link <https://thales.integrityline.org> on the www.thalesalieniaspace.com webpage;
- **Mail:** hardcopy, regular or registered mail to be sent to the Company's registered office in Via Saccomuro, 24 - 00131 Rome, addressed "*To the Attention of the Supervisory Board.*" The whistleblower must send the report in two sealed envelopes: the first containing his or her identification data (indicating, where appropriate, the means by which he or she wishes to be contacted) together with a photocopy of his/her ID (identification document); the second containing the report; both envelopes must be placed in a third envelope;
- **In-person Meeting:** the whistleblower may submit a request for a meeting with the Supervisory Board by mail following the above directions; the meeting shall be set within a reasonable time from the request. In such case, the report is made orally in an in-person meeting with the staff in charge duly trained and appointed by the Data Controller, who, with the consent of the whistleblower, documents the report by recording it on a device suitable for storage and subsequent re-listening, or by hard-copy or electronic format minutes, to be archived in both circumstances in compliance with personal data protection and confidentiality.

The whistleblower is always entitled to use ANAC's external reporting channel as well, available on the Authority's webpage at the following link <https://www.anticorruzione.it/-/whistleblowing>.

6. Data Communication

For the pursuit of the aforementioned purposes, the personal data provided may be processed only by those who require it within the Data Controller organization due to their role/task performed in relation to the process of handling whistleblowing reports and of any subsequent actions.

These individuals are appropriately trained by the Data Controller in order to avoid loss, access to the data by unauthorized parties or unauthorized processing of the data itself and, more generally, in relation to personal data protection obligations.

In addition, personal data may also be processed by third parties (e.g., the IT platform provider), who act as Data Controllers and have signed a special contract that regulates the processing entrusted to them and the obligations regarding data protection and the security of processing pursuant to Article 28 of the GDPR without fail.

In the framework of the whistleblowing report management, personal data may be disclosed in part connected to specific expertise,

- to public administrations entitled by law (e.g. Judicial Authorities, Police Bodies, ANAC);
- to other public and/or private parties to whom the communication is strictly necessary for the pursuit of the aforementioned purposes;
- to professionals and consultants;
- to compliance/auditing companies;
- to investigative agencies;
- to the Supervisory Board appointed pursuant to Legislative Decree No. 231/2001;
- to Parent Companies [that are] part of the same Group to which the Data Controller belongs.

7. Data Retention Period

In accordance with the provisions of Article 14 of Legislative Decree No. 24/2023, personal data will be retained for the shortest period possible and strictly necessary in view of the processing purposes pursued and, in any case, no longer than 5 years from the date of the communication of the final outcome of the reporting procedure, unless, during the 5-year period, legal proceedings resulting from a report should arise. In the latter case, the data retention period will be defined by the actual duration of said judicial proceedings.

8. Personal Data Transfer to Non-EU Countries

In compliance with the requirements of Chapter V of the GDPR, the Data Controller, as part of the Thales Group, may transfer personal data to non-EU countries in order to ensure the proper handling of the report. In such a case, the Data Controller will transfer said data on the basis of an adequacy decision or through standard contractual clauses and in any case in compliance with all further conditions, if any, prescribed by the competent national and European Supervisory Authorities in relation to the transfer of said data outside the European Economic Area.

9. Data Subjects Rights

The data subject, in the persons of the whistleblower or the facilitator, has the right to access at any time data concerning him or her and to exercise the rights provided for in Articles 15 to 22 of the GDPR, as far as applicable (right of access to personal data, right to rectify them, right to obtain their deletion or so-called right to be forgotten, the right to restriction of processing, the right to data portability or the right to object the data

processing), by sending an e-mail to the pec address: thalesalieniaspaceitalia@pec.it or the address: GDPR-TASI@thalesalieniaspace.com or to the DPO at dataprotection@thalesgroup.com. In addition, the interested party has the right to file a complaint with the competent data protection authority. The aforementioned rights may not be exercised by the person involved or the person mentioned in the report, for the time and to the extent that this constitutes a necessary and proportionate measure, pursuant to Article 2- *undecies* of Legislative Decree No. 196/2003 (Privacy Code), as the exercise of these rights could result in actual and concrete prejudice to the protection of the identity of the whistleblower's confidentiality.