

Information notice pursuant to Section 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”) (the “Information Notice”) – on:

Processing of Personal Data Related to Whistleblowing Reports in which the Whistleblower Disclosed His/Her Identity.

Within the whistleblowing management system regulated by the “*Whistleblowing Management Guidelines*” published on the website www.leonardocompany.com, Leonardo S.p.A. (hereinafter, the “**Company**”, “**Leonardo**”, or the “**Data Controller**”), as Data Controller, will acquire your personal data, any time you will file a whistleblowing report disclosing your identity (hereinafter, the “**Whistleblowing Report/s**”), in relation to facts concerning the Company. For your information, the Data Controller acquires and processes personal data of all whistleblowers, regardless of the origin of the Whistleblowing Report (for instance, employees of the Company or of Leonardo Group, members of corporate bodies, Group Companies, third parties, consultants, collaborators, clients, and agents). In the event that the Whistleblowing Report is about another Group Company, and should be examined by the latter, the Company will process the personal data in order to forward the same Whistleblowing Report to the competent Monitoring Authority or Surveillance Body of the Group Company involved.

In light of the above, the Data Controller hereby informs you as follows.

1. Data Controller, Surveillance Body, and Data Protection Officer

- 1.1.** The Data Controller of personal data acquired from Whistleblowing Reports, in relation to facts concerning the Company, is Leonardo S.p.A., with registered offices in Rome (Italy), Piazza Monte Grappa, 4 - 00195, email: leonardo@pec.leonardocompany.com.
- 1.2.** The Data Controller has appointed the Company’s Surveillance Body, which has specific authority to process Whistleblowing Reports at the Company’s registered offices.
- 1.3.** Leonardo has also appointed a Whistleblowing Committee, which is a single body at Group level appointed by the CEO of Leonardo, and composed of top managers of the organizational units of the Company, specifically authorized to process personal data relating to Whistleblowing Reports, also on behalf of the other Group Companies. The Whistleblowing Reports received from the Supervisory Body of Leonardo, or the Group Company, are transmitted to the Whistleblowing Committee, if not previously dismissed. Within the whistleblowing management by the Whistleblowing Committee, Leonardo, or the Group Company, will process personal data, each as independent Data Controller, in full compliance with the provisions of the Applicable Privacy Law.
- 1.4.** The Data Controller has appointed a *Data Protection Officer* (DPO), as provided for by the GDPR, with the tasks 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: DPO.leonardo@leonardocompany.com.



2. Categories of personal data

- 2.1. The processing concerns the personal data acquired through the receipt of your Whistleblowing Report, within the scope of the “*Whistleblowing Management Guidelines*”. The data collected concern, *inter alia*, your personal (name, last name), which allow to recognize the identity of the whistleblower, as well as the contents of the Whistleblowing Report.
- 2.2. The Data Controller shall not process special categories of personal data pursuant to Section 9 of the GDPR. Should any special categories of personal data be received by the Data Controller, the latter shall immediately erase them.

3. Legal basis and purposes of the processing

- 3.1. Your personal data shall be processed by the Data Controller, in compliance with the Applicable Privacy Law, for the following purposes:
 - (i) Management of Whistleblowing Reports received in accordance with the “*Whistleblowing Management Guidelines*”, and for all and any purposes related to the handling process set forth in 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 Guidelines, in the employment contract, in the Ethic Code, as well as in the applicable Company Protocols and laws;
 - (ii) Mention of the whistleblowing 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 identity of the employer be disclosed in his/her Whistleblowing Report, in accordance with the “*Whistleblowing Management Guidelines*”.
- 3.2. Your personal data shall be processed for the purposes indicated in point 3.1(i) above, on the basis of the specific legal obligations arising for the Company pursuant to Section 6 of Legislative Decree no. 231/2001, as amended by Law n. 179/2017, as well as on the basis of the legitimate interest of the Company itself in pursuing defensive objectives, internal control, and monitoring of business risks arising from the receipt of your Whistleblowing Report.
- 3.3. On the other hand, your personal data shall be processed solely on the basis of your prior, free and specific consent, where the conditions for the purposes referred to in point 3.1(ii) above are met.
- 3.4. For the sake of completeness, please be informed that, even in the absence of your consent for the purposes referred to in point 3.1(ii) above, the Company shall still manage your Whistleblowing Report pursuant to point 3.1(i) above, without this causing any detriment to your employment.



4. Modalities of the processing

- 4.1. The processing of the personal data of the data subjects concerned 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 - including the Company's Surveillance Body, the Whistleblowing Committee referred to in the "*Whistleblowing Management Guidelines*", and the appointed personnel belonging to the Company's Group Internal Audit and Security Organizational Units - and 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. In any case, your personal data shall be processed according with: (i) the principles of proportionality and necessity, thus unnecessary personal data shall be neither processed nor collected; (ii) the principle of loyalty and transparency, according to which adequate communication shall always be ensured to the data subjects concerned; and (ii) 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 3.1 above, personal data may be communicated to the corporate bodies of the Company, to the personnel of the Company appointed for such purpose, as well as to external counsels in order to activate the judicial and/or disciplinary protection related to the Whistleblowing Report. In addition, the data may also have to be communicated to police and judicial authorities.
- 5.2. Your data shall be neither disseminated nor transferred to third countries outside the European Union nor to international organizations.

6. Rights of the Data Subject

- 6.1. With regard to the personal data held by the Data Controller, you may exercise all and any rights provided for by the Applicable Privacy Law, and namely:
 - 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) file 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 disclose the names of those 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, in its capacity as authorized subject, by sending an email to the following address: organismodivigilanza@leonardocompany.com.

7. Data retention

Personal data processed by the Data Controller shall be stored for the time strictly necessary for the purposes referred to in point **3.1** above, and, in any case, shall be deleted after 10 years from their transmission.



[form for the collection of consent to be used only in the case of Whistleblowing Report in which the whistleblower disclosed his/her identity, pursuant to Section 2.1 of the "Whistleblowing Management Guidelines", with subsequent consent of the interested party to mention the whistleblowing initiative taken in their personal HR file, in support of the professional experience gained and the individual career path.]

PROCESSING OF PERSONAL DATA

(pursuant to Applicable Privacy Law)

Having read the above information, and without prejudice to my right to withdraw consent at any time, I, the undersigned, after having read and taken note of the contents of the above information, pursuant to and for the purposes of Sections 6 and 7 of the GDPR and the Applicable Privacy Law,

agree

do not agree

to the processing of my personal data for the purposes referred to in point **3.1(ii)** of the above information and, in particular, to the mention of the whistleblowing initiative in my personal HR file, accompanying the professional experiences gained and my path career, in compliance with the "*Whistleblowing Management Guidelines*" adopted by the Company.