Blu Bird Fabbrica Motori s.r.l.
Via Due Camini 19 - 36010 ZANE' (VI) – ITALIA
Tel. +39 0445 314 138 - Fax +39 0445 314 225
http://www.bluebirdind.com - info@bluebirdind.com
bluebirdind@pecimprese.it

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLES 13–14 OF REGULATION (EU) 2016/679 IN THE CONTEXT OF THE WHISTLEBLOWING POLICY

Updated October 2026 – Whistleblowing Policy version 2.0

Through this privacy notice, Blue Bird Industries Fabbrica Motori Srl (hereinafter the "Company") intends to provide the information required under Articles 13 and 14 of Regulation (EU) 2016/679 (the "General Data Protection Regulation" or "GDPR") concerning the processing of personal data carried out by the Company in the context of its "Whistleblowing Policy", adopted pursuant to Legislative Decree No. 241 of 10 March 2023 (version 2.0), and, in particular, all activities and requirements connected with the operation of the Company's whistleblowing report management system.

The following information is provided to "reporting persons" and to all other persons who may be "data subjects", such as persons identified as potentially responsible for unlawful conduct, any "facilitators" (as defined by applicable law), and any other persons involved in any capacity in the "Whistleblowing Policy".

1. Data Controller and DPO – "Data Protection Officer"
The Data Controller is Blue Bird Industries Fabbrica Motori Srl, with registered office at Via Due Camini 19, Zanè (VI), Italy. The Controller has appointed a Data Protection Officer ("DPO"), whom data subjects may contact by writing to the following address: privacy@bluebirdind.com.

2. Categories of personal data processed and purposes of processing
Under this framework, the Company may obtain personal data contained in whistleblowing reports or in the records and documents attached to them, submitted through the channels provided for in the above-mentioned Policy (the digital platform, in writing or by voice messaging, and an in-person meeting with the person responsible for managing reports).

Depending on their content, the receipt and management of such reports may entail the processing of the following categories of personal data:

a) ordinary personal data within the meaning of Article 4(1) of the GDPR, including, for example, identification details (first name, surname, date and place of birth), contact details (landline and/or mobile telephone number, postal/email address), job position/duties, as well as the reporting person's voice where the report is made using a voice messaging system or recorded during an in-person meeting;
b) "special categories" of personal data under Article 9 of the GDPR, including, for example, information concerning health, political opinions, religious or philosophical beliefs, sexual orientation or trade union membership;
c) personal data relating to criminal convictions and offences under Article 10 of the GDPR, or related security measures.

With reference to the above categories of personal data, it is important that submitted reports do not contain information that is manifestly irrelevant for the purposes of the applicable legal framework. Reporting persons are specifically requested to refrain from including "special category" data or data relating to criminal convictions and offences unless considered necessary and indispensable for the report, in compliance with Article 5 of the GDPR.

1 Legislative Decree implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019.

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The above information will be processed by the Company, in its capacity as Data Controller, in accordance with Legislative Decree No. 24/2023 and therefore, in general, to conduct the necessary investigative activities to verify the substance of the reported facts and adopt the resulting measures.

Furthermore, the Controller may use the data for purposes connected with defending or establishing its rights in judicial, administrative or out-of-court proceedings and in civil, administrative or criminal disputes arising in connection with a report.

3. Legal basis for the processing of personal data

The legal basis for processing personal data is primarily compliance with a legal obligation to which the Controller is subject – Article 6(1)(c) of the GDPR – whereby, in particular, under the above-mentioned legislation, it is required to implement and manage dedicated reporting channels for receiving reports of unlawful conduct that harms the integrity of the Company and/or the public interest.

In the cases provided for under the same legislation, the reporting person may be asked to provide specific and freely given consent – pursuant to Article 6(1)(a) of the GDPR – particularly where it is necessary to disclose their identity or where the recording of reports received orally, by telephone, through voice messaging systems, or during in-person meetings with the person responsible for handling reports is envisaged. Consent may be withdrawn at any time, without affecting the lawfulness of processing based on consent given before its withdrawal.

The processing of any "special categories" of personal data contained in reports is based on the fulfilment of obligations and the exercise of specific rights of the Controller and the data subject in the field of employment law, pursuant to Article 9(2)(b) of the GDPR.
The processing of personal data relating to criminal convictions and offences is carried out pursuant to Article 10 of the GDPR and Article 2-octies of the Italian Privacy Code, as authorised by Legislative Decree No. 24/2023.

For the purpose of establishing, exercising or defending legal claims in court, the legal basis for processing is the legitimate interest of the Controller, pursuant to Article 6(1)(f) of the GDPR; for the same purpose, the processing of any "special categories" of personal data is based on Article 9(2)(f) of the GDPR.

4. Nature of the provision of personal data

Providing the reporting person's identification details is optional: in accordance with the "Whistleblowing Policy", the Company also handles anonymous reports, provided that they contain sufficiently detailed information. Failure to provide such data may, however, make it more difficult to verify the reported facts. The personal data provided will be processed for the purpose of handling the report, within the limits and subject to the confidentiality safeguards required by the applicable legislation.

5. Processing methods and retention period for personal data

The processing of personal data contained in reports submitted under the "Whistleblowing Policy" will be carried out by persons "authorised" by the Company and will comply with the principles of fairness, lawfulness and transparency set out in Article 5 of the GDPR.

Personal data may be processed using paper-based and/or electronic/telecommunications tools for storage, management and transmission. In all cases, appropriate physical, technical and organisational measures will be applied to ensure their security and confidentiality at every stage of the procedure, including the archiving of the report and related documents – without prejudice to Article 12 of Legislative Decree No. 24/2023 – with particular regard to the identity of the reporting person, the persons involved

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and/or otherwise mentioned in the reports, the contents of the reports and the related documentation.

No automated decision-making, including profiling, is carried out in relation to personal data.

Reports received by the Company, together with any attached records and documents, will be retained for the period necessary to handle them and, in any event, as required by law, for no longer than five years from the date on which the final outcome is communicated. After this period, reports will be deleted from the system or retained in anonymised form.

In accordance with Section 2, personal data contained in reports that are manifestly irrelevant to the purposes of the report will be deleted immediately.

6. Disclosure and transfer of personal data

In addition to the above-mentioned internal persons specifically authorised by the Controller, the collected personal data may also be processed, in the context of the "Whistleblowing Policy" and for the stated purposes, by the following third parties, formally appointed as Data Processors where the conditions set out in Article 28 of the GDPR are met:

- the provider of the digital platform used to receive and manage reports;
- providers of consulting and support services for the implementation of the "Whistleblowing Policy";
- IT companies and professionals involved in implementing appropriate technical, IT and/or organisational security measures for information processed by the Company's systems.

Where applicable, personal data may be transmitted to judicial and/or law enforcement authorities requesting them in the context of judicial investigations, as well as to the relevant public accounting authority and ANAC in the cases provided for by law.

Under no circumstances will personal data be made publicly available.

7. Rights of the data subject

Each data subject is entitled to exercise the rights provided for under Articles 15 et seq. of the GDPR, including the right to obtain access to their personal data from the Controller and, for example, to have such data rectified or erased or to obtain restriction of processing concerning them. Where a satisfactory response is not received, the data subject may lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali).

To exercise these rights, a specific request may be submitted in any written form to the Controller at the following address: privacy@x.com, or the form available on the website of the Italian Data Protection Authority may be sent to the same address.

In this regard, please note that the above rights of data subjects may be restricted pursuant to and for the purposes of Article 2-undecies of Legislative Decree No. 196 of 30 June 2003 (the "Privacy Code", as amended by Legislative Decree No. 101/2018), for as long as, and to the extent that, such restriction constitutes a necessary and proportionate measure where the exercise of those rights could result in actual and concrete prejudice to the confidentiality of reporting persons' identities.

In such cases, data subjects nevertheless retain the right to refer the matter to the Italian Data Protection Authority so that it may assess whether the conditions are met for taking action according to the procedures laid down in Article 160 of Legislative Decree No. 196/2003.