

PRIVACY POLICY

Pursuant to Articles 13 and 14 of EU Regulation 2016/679 of 27 April 2016 (hereinafter referred to as the "Privacy Regulation"), the following information is provided to data subjects regarding the processing of personal data carried out in relation with whistleblowing reports.

1. Identity of the Joint Data Controllers, point of contact and contact details of the Data Protection Officers

The following companies are joint data controllers (hereinafter referred to as "Joint Controllers"):

- **TotalEnergies Italia Servizi S.c.r.l.**, with registered office in Milan, Via Rombon 11, 20134 (E-mail: ep.tis.data-protection@total.com, tel: +39 02-540681). The Data Protection Officer can be contacted by writing to the email ep.tis.data-protection@total.com
- **TotalEnergies EP Italia S.p.A.**, with registered office in Milan, Via Rombon 11, 20134 (E-mail: ep.tepit.data-protection@total.com, tel: +39 02-540681). The Data Protection Officer can be contacted by writing to the email ep.tepit.data-protection@total.com
- **TotalEnergies Marketing Italia S.p.A.**, with registered office in Milan, Via Rombon 11, 20134 (E-mail: ms.privacy@totalenergies.com, tel: +39 02-540681). The Data Protection Officer can be contacted by writing to mario.mazzeo@studiolegaleml.it
- **AS 24 Italia S.r.l.**, with registered office in Milan, Via Rombon 11, 20134 (E-mail: as24italia@legalmail.it, tel: +39 02-540681).
- **Gasket International S.r.l.**, with registered office in Cividino di Castelli Calepio (BG), Via Colleoni, 5C - 24060 (E-mail: info@gasket.it, tel: +39 030-7435508).
- **VSB Energia Verde Italia S.r.l.**, with registered office in Potenza, Via della Chimica 103 - 85100 (E-mail: italia@vsb.energy, tel: +39 [0971 281981](tel:+390971281981)).

which, pursuant to Article 26 of the Privacy Regulation, have determined in a transparent manner, by means of an internal agreement, their respective responsibilities with regard to compliance with personal data protection obligations related to the processing of data in the context of whistleblowing reports. The point of contact for whistleblowers designated by the Joint Data Controllers is the Head of the Internal Channel, who can be reached via the web portal (<https://totalenergiesitalia.integrityline.com>).

2. Personal data subject to processing

As part of the Whistleblowing procedure, the person making a report ("Whistleblower") may send a report completely anonymously,

with no indication of personal data from which his or her identity could be directly or indirectly traced.

If the Whistleblower voluntarily, freely and optionally decides to provide some of his or her personal data, these will be processed.

By way of example, the following categories of personal data may be processed:

- personal data (e.g. first name, surname, tax code, address, date and place of birth);
- contact details (e.g. telephone numbers, landline and/or mobile, e-mail address);
- data of a professional nature (e.g. hierarchical level, company division where the person works, company role, type of relationship with the Company or other third parties, profession);
- image data and/or voice data;
- any information concerning the reported person, or the other concerned persons, which the whistleblower decides to disclose in order to substantiate the report;
- the information that the whistleblower, or other concerned persons, disclose to the Joint Controller as part of the handling of the report;
- special data (e.g. data relating to political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health or sexual life or sexual orientation);
- judicial data;
- any other data relating to the whistleblowing report that may or may not fall within the above categories.

Please provide only the data necessary for the handling of Whistleblowing Reports.

Personal data that are clearly not useful for processing the report are not collected or, if accidentally collected, are deleted immediately.

3. Purpose

The personal data of the Whistleblower, of the person involved and of the person otherwise mentioned in the report will be processed, within the limits stated above, for the purpose of

- receiving, analysing and managing, through the designated communication channels, reports - including anonymous reports - concerning alleged irregularities and/or unlawful conduct (whistleblowing reports) committed by persons who, in various capacities, interact with the Joint Controller and of which the whistleblower has become aware;
- carrying out all further activities related to and necessary for managing the report in an exhaustive manner (e.g. conducting interviews, collecting elements useful for the investigation of the case under examination, etc.) by the persons in charge, who are designated as persons authorised to the processing of personal data;

- replying to any requests from the relevant authorities and bodies, etc.

4. Legal basis

The legal basis of this processing, pursuant to Article 6 section 1 letter c) and Article 9 section 2 letter g) of the Privacy Regulation, is in the fulfilment of a legal obligation deriving from the provisions of Legislative Decree No. 231/2001, Law No. 179/2017 and Legislative Decree No. 24/2023 on the protection of persons reporting conduct, acts or omissions that harm the public interest or the integrity of the Joint Controllers.

5. Processing methods

The processing will be carried out by authorised personnel (Head of the Internal Channel) specifically trained to handle the whistleblowing reports, with or without the use of electronic means, in compliance with the principles set out in Articles 5 and 25 of the Privacy Regulation, so as to protect the confidentiality and rights of the data subjects at all times in accordance with the law.

Whistleblowing reports, both anonymous and non-anonymous, can be sent through the communication channels set up for this purpose, in order to simplify and optimise the reporting procedure; in addition, the whistleblower may attach files and documentation to prove the validity of his or her report.

In order to protect confidentiality, and ensure anonymity where applicable, appropriate technical and organisational measures have been implemented.

The data subjects are asked for specific authorisation, as provided for by Legislative Decree 24/2023, in the following cases:

- possible disclosure of the whistleblower's identity to persons other than those authorised to receive or follow up on reports;
- for documentation purposes by means of a recording on a device suitable for storage and listening or a verbatim transcription of the report made orally during a meeting with the personnel in charge or through minutes of the meeting.

The data subjects will be asked for specific authorisation accompanied by an appropriate notice, containing the reasons for disclosing their identity, in the following cases:

- in disciplinary proceedings, if the charge is based in whole or in part on the report, where the whistleblower's identity is necessary for the defence of the person charged in the disciplinary proceedings;
- in proceedings instituted following internal or external reports, where such disclosure is also necessary for the defence of the person involved.

6. Recipients

The personal data of the whistleblower, or of other data subjects, may be made available to:

- the Company EQS Group S.r.l. or to the IT companies managing the Software and appointed as Data Processors;
- public Authorities and other entities in fulfilment of legal obligations (e.g. Judicial Authority, Court of Auditors, ANAC), in their capacity as Data Controllers.

The data of data subjects will not be disseminated (i.e. made available to unspecified persons).

The whistleblowing Report will be received and managed by the Head of the Internal Channel, who is expressly authorised to process the data.

The personal data included in the Whistleblowing Report, together with the documentation supporting it, may be disclosed, to the extent strictly necessary, to the following persons who have a confidentiality obligation:

- support staff of the Head of the Internal Channel, expressly authorised to process data in accordance with Article 29 of the GDPR and Article 2-quaterdecies Legislative Decree 196/2003 as amended;
- external consultants who may provide advice to the Company regarding the management of Whistleblowing Reports.

The above-mentioned persons guarantee that the identity of the Whistleblower, of the person involved and of the person otherwise mentioned in the report, as well as of the content of the report and of the relevant documentation, shall be kept confidential.

7. Retention period

The Joint Controller shall retain the data relating to Whistleblowing Reports for as long as necessary for the processing of the Report and in any case no longer than five (5) years from the date the final outcome of the Whistleblowing procedure has been notified, subject to any legal obligations, disciplinary proceedings or litigation in progress. In the case of disciplinary or litigation proceedings, the data shall be retained for the duration of the proceedings until the time limit for appealing has expired.

Once this time limit has expired, the data will be deleted or anonymised.

8. Data source

The data are voluntarily provided by the data subjects or may be provided by third parties and, without prejudice to the reporter's right to anonymity, the provision of the data requested by the web platform or as part of the oral interview is necessary in order to follow up the Report.

Refusal to provide them may result in the impossibility of properly handling the report or the management of any objections that may be raised to the Report, and may lead to the filing of the Report.

9. Rights of data subjects

Data subjects have the right to request from the Head of the Internal Channel and in any case from each of the Data Controllers access to their personal data and the

rectification or deletion thereof or the restriction of processing concerning them or to object to processing of personal data (Art. 15 et seq. of the Privacy Regulation). Without prejudice to any other administrative or judicial remedy, data subjects have the right to lodge a complaint with the Data Protection Authority if they consider that the processing of personal data relating to them infringes the Privacy Regulation (Art. 77).

Restriction of data subject's rights.

Pursuant to Article 2-undecies of Legislative Decree 196/2003 as amended, the rights referred to in Articles 15 to 21 of the Privacy Regulation mentioned above may not be exercised by making a request to the Joint Controllers or by lodging a complaint pursuant to Article 77 of the Privacy Regulation if the exercise of those rights may result in actual and concrete prejudice to the confidentiality of the identity of the whistleblower who reports breaches of which he/she has become aware in the performance of his/her functions or employee duties.