



PRIVACY NOTICE
ON THE PROCESSING OF PERSONAL DATA RELATING TO WHISTLEBLOWING PROCEDURE

1. Data Controller

Lear Corporation Italia S.R.L. (hereinafter also referred to the “**Data Controller**” or the “**Company**”) in its capacity as Data Controller, informs you that EU Regulation No. 2016/679 (i.e., **GDPR**) and Italian Legislative Decree 196/2003 as amended govern the protection of personal data. The Company bases its data processing on the principles of fairness, lawfulness, transparency and necessity, as provided by in the said legislation. To this end, pursuant to Arts. 13–14 GDPR, we provide you with the following information.

2. Types of Data being processed

The receipt and management of reports leads to the processing of “simple” personal data (first name, surname, job title) of the whistleblower, unless anonymous, and of the person to which the report refers and of any other involved persons, any other information relating to proven or suspected unlawful conduct, and may give rise, depending on the content of the reports and the acts and documents attached to them, to processing of “particular” personal data (relating to health conditions, sexual orientation or trade union membership, pursuant to Art. 9 GDPR) and personal data relating to criminal convictions and offenses (Art. 10 GDPR).

3. Purposes and Legal Basis of the Processing

Personal data is collected and processed for the purposes strictly related to the management of reports of misconduct, in violation of national/European rules and if adopted by the Lear’s Code of Business Conduct and Ethics, and 231 Model and any other applicable policies. In particular:

- a) allow registration to the IT platform adopted by the Data Controller to facilitate the handling of reports, while ensuring the highest standards to protect the confidentiality of the reporter and of the persons involved in the report in any capacity;
- b) allow the whistleblower to make a report 1) either through a recorded telephone line or another recorded voice messaging system which, subject to the consent of the whistleblower, will record the information provided 2) or through the platform made available by the Controller (through which it is also possible to request a face-to-face meeting with the Whistleblower Committee)
- c) allowing the whistleblower to make an anonymous report, taking care to remove any reference that might identify the whistleblower, even indirectly;
- d) managing and analysing the report made pursuant to Legislative Decree no. 24/2023 which transposed in Italy Directive (EU) 2019/1937;
- e) fulfilment of obligations provided for by law or EU regulations;
- f) defence or ascertainment of one's own right in civil, administrative or criminal litigation

Taking into account the relevant legislation (EU Directive No. 1937/2019 and Legislative Decree n. 24/2023), the legal basis for such processing is therefore:

- for the purposes under (a), (b), (c), (d) and (e), the fulfilment of a legal obligation to which the Controller is subject (Art. 6(1)(c) of the GDPR);
- for the purposes referred to in point f), by the legitimate interest of the Controller (Art. 6(1)(f) of the GDPR).



The provision of the data is necessary for the achievement of the above purposes; failure to provide the data, or providing partial or inaccurate data, may result in the impossibility of handling the report.

4. Processing methods

The data provided within the framework of the report will be processed mainly by electronic and manual systems in accordance with the principles of fairness, loyalty and transparency laid down by the applicable legislation on the protection of personal data and by the provisions on whistleblowing, protecting the confidentiality of the person to whom the data refer and adopting technical and organisational security measures to ensure an adequate level of security (e.g. preventing access to unauthorised persons except in cases required by law, or the ability to restore access to the data in the event of physical or technical incidents).

The identity of the whistleblower and any other information from which such identity can be derived, directly or indirectly, shall be processed exclusively by persons authorized to process data pursuant to GDPR Article 29 and shall not be disclosed to other persons without the whistleblower's specific consent, as prescribed by Article 12(2) of the Decree. Consent is voluntary and is given at the time of reporting via the platform.

5. Period of retention of personal data

Reports and related documentation (including any recordings, if a recorded telephone line or other recorded voice messaging system is used for reporting) shall be retained, in accordance with the principle of minimisation, for the time necessary to process the report and in any case no longer than 5 years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations laid down in the relevant legislation in force, except in the event of specific requirements to defend or protect the rights and/or legitimate interests of Data Controller or third parties, including in the event of complaints, litigation or pre-litigation. At the end of the retention period, the records shall be deleted.

Personal data that are clearly not useful for the processing of a specific report shall not be collected or, if accidentally collected, shall be deleted promptly.

6. Communication and Data Transfer

Your data will not be disclosed, but will be processed by the following individuals, including but not limited to:

- the Whistleblowing Committee;
- public authorities fulfilling specific legal obligations and judicial authorities acting as independent data controllers;
- internal (e.g., Lear Corporation, 21557 Telegraph Road, Southfield, MI 48033, USA as the parent company assisting the whistleblowing procedure) and external companies entrusted with whistleblowing management services and IT service providers (e.g., the IT provider of the whistleblowing platform), which act as Data Processors pursuant to GDPR Art. 28, subject to confidentiality and only for functional purposes of their assignment;
- the Supervisory Body;
- Legal Counsels who may be involved in the investigatory phase (prior consent of the whistleblower);



- any functions involved in the investigation and investigatory phase (investor whistleblowing), specifically and purposely authorized and bound by confidentiality (prior consent of the whistleblower).

The list of external data processors is available at the registered office of the Company.

Personal data is transferred outside the European Economic Area for processing purposes towards the United States of America (i.e., Lear Corporation as a data processor). The Data Controller undertakes to ensure adequate levels of protection and safeguards, including contractual safeguards, in accordance with the applicable regulations, including reliance on the European Commission's adequacy decisions for those countries that do have them, or the stipulation of contractual clauses.

7. Your rights as a Data Subject

It should be noted that, pursuant to GDPR Articles 15–22, you may exercise, within the limits set out in Privacy Code Article 2-undecies, the right to:

- a) access to personal data;
- b) rectification in the event of inaccuracy;
- c) erasure of data;
- d) restriction of processing;
- e) data portability, i.e., to receive the personal data provided in a structured, commonly used and machine-readable format and to obtain the transfer to another Data Controller without hindrance;
- f) the right to object to processing, where the prerequisites are met;
- g) withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

In addition, the data subject may lodge a complaint with the Data Protection Authority at Piazza Venezia 11, 00187 Rome, Italy.

If you have any further questions about this policy or any privacy matters, or if you wish to exercise your rights, please contact the Data Controller, in the person of the Data Privacy Contact Italy, to the following email address: EuropeDataProtection@lear.com.

8. Updating

This privacy notice has been updated on December 12, 2024.

The Data Controller

A large, stylized blue handwritten signature or scribble that overlaps the text 'The Data Controller' and extends upwards and to the right.