



<p>ALITALIA – SOCIETÀ AEREA ITALIANA S.p.A. in amministrazione straordinaria</p> 	<p>Title: WHISTLEBLOWING POLICY</p>	<p>Issued by: MANAGEMENT BODY</p>	<p>Date: 01/07/2019</p>	<p>Code: Policy 5-2018</p>
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APPROVED BY


FOR THE SPECIAL ADMINISTRATION

<p>ALITALIA – SOCIETÀ AEREA ITALIANA S.p.A. in amministrazione straordinaria</p> 	<p>Title: WHISTLEBLOWING POLICY</p>	<p>Issued by: MANAGEMENT BODY</p>	<p>Date: 01/07/2019</p>	<p>Code: Policy 5-2018</p>
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Annex: WHISTLEBLOWING REPORT RELATING TO ANY IRREGULARITIES

<p>ALITALIA – SOCIETÀ AEREA ITALIANA S.p.A. in amministrazione straordinaria</p> 	<p>Title: WHISTLEBLOWING POLICY</p>	<p>Issued by: MANAGEMENT BODY</p>	<p>Date: 01/07/2019</p>	<p>Code: Policy 5-2018</p>
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1. PURPOSE AND SCOPE OF APPLICATION

This Policy is aimed at, (i) introducing clear information channels for filing, assessing and processing any Whistleblowing Report (hereinafter also “Report”), whether anonymous or otherwise, in relation to breaches (or alleged breaches) of the Management and Control Organisation Model (hereinafter also “MCOM” or the “Model”) and/or of the Code of Ethics of Alitalia - Società Aerea Italiana S.p.A. under special administration (hereinafter also “Alitalia”) and the other Alitalia Group Companies (hereinafter also “Group Companies”), and (ii) defining the activities for the proper handling of the Reports by the Supervisory Body (hereinafter also abbreviated as “SB”).


This Policy is based on and complies with article 6, paragraphs 2-bis, 2-ter and 2-quater, of Legislative Decree 231/01, as amended by Law 179/2017 containing “Provisions for protecting employees, in both the public and private sectors, reporting any irregularities occurring in the workplace”, which provides as follows:

“paragraph 2-bis. The models referred to in letter a) of paragraph 1 provide for:

- a) *one or more channels enabling the persons specified in article 5, paragraph 1, letters a) and b) (the whistleblower), to file detailed reports exposing any illegal and unethical behaviour within an entity, for the purpose of protecting the integrity of the said entity, deemed significant within the meaning of this decree and grounded on precise and consistent facts, or any violations of the entity’s organisation and management model, which come to their attention, by reason of their functions; such channels shall ensure the confidentiality of the identity of the ‘whistleblower’, in connection with the handling of the report;*
- b) *at least one alternative reporting channel, suited to ensuring, by electronic means, the confidentiality of the ‘whistleblower’s’ identity;*
- c) *the prohibition of any direct or indirect acts of retaliation or discrimination against the ‘whistleblower’, for reasons directly or indirectly related to the whistleblowing activity;*
- d) *within the framework of the disciplinary system adopted pursuant to paragraph 2, letter e), sanctions against whoever violates the measures for protecting the ‘whistleblower’, or whoever files a whistleblowing report, maliciously and intentionally, which is then found to be unsubstantiated.*

paragraph 2-ter. *The adoption of discriminatory measures against any persons filing the reports referred to in paragraph 2-bis above may be reported to the National Labour Inspectorate, for taking the necessary measures, by either the ‘whistleblower’ or the trade union organisation indicated by him or her.*

paragraph 2-quater. *The dismissal of the ‘whistleblower’, for retaliatory or discriminatory reasons, is null and void, and likewise any changes in his or her job duties, pursuant to article 2103 of the Italian Civil Code, as well as any other retaliatory or discriminatory measure adopted against the ‘whistleblower’. In the event of a controversy arising out any disciplinary measures against the ‘whistleblower’, or his or her demotion, downgrading, dismissal, removal, or other organisational measure with direct or indirect negative consequences on his or her working conditions, after submitting a report, it is the employer’s responsibility to prove that the said measures are unrelated to the report.”*

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Under this Policy all concerns relating to any conduct, risks, wrongdoings, offences, including attempted offences, abuses of power for personal reasons, capable of causing damage to the Company, are deemed to be significant.

In particular, by way of example and without limitation, the Report may concern irregularities which:

- constitute a criminal offence;
- breach the Model and/or Code of Ethics and/or other disciplinary provisions;
- are capable of causing financial damage to the Company, or other related entity;
- are capable of harming the health or safety of the employees, customers and members of the public, or of damaging the environment;
- are capable of harming the users, employees or other persons carrying out any activities on the entity's premises.


A Whistleblowing Report shall not contain any personal complaints by the reporter, nor any claims/requests that may be settled in accordance with the applicable employment regulations or concerning which reference must be made to the rules and procedures applied by the HR management.

This Policy applies to the recipients of the Model and/or the Code of Ethics, namely:

- the representatives, directors or managers of the Company, or of any of its business units enjoying financial and functional autonomy, as well as the persons responsible for managing and supervising the Company;
- the persons subject to the direction or supervision of any of the above (pursuant to art. 5, Legislative Decree 231/2001);
- the persons engaged in achieving the purpose and targets of the Company. Therefore, the Recipients of the Model also includes:
 - the members of the Management Body;
 - the Company's Internal Auditing Board;
 - the persons performing the functions of the Supervisory Body;
 - the employees;
 - the freelance consultants;
 - the partners;
 - the financial counterparties.

2. REFERENCES

- Code of Ethics
- Organisation, Management and Control Model pursuant to Legislative Decree 231/01
- Personal Data Protection Code (Legislative Decree 196/03).
- European Regulation for the protection of personal data (Regulation 679/2016).
- Adjustments to the EU Regulation 2016/679 (Legislative Decree 101/2018).
- Legislative Decree 231/01 or Decree on the "Administrative responsibility of legal persons, companies and organisations, including those without legal personality", as amended.

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- Law 179/2017 containing “Provisions for protecting employees, in both the public and private sectors, reporting offences and wrongdoing in the workplace”.

3. RESPONSIBILITY AND DISSEMINATION

This Policy is an integral part of the Model of Alitalia and of and the other Group Companies and, therefore, has been approved by the Parent Company’s Management Body and shall be transposed by Management Bodies of the Subsidiaries.

The Policy may be accessed electronically:

- In the SharePoint of Alitalia in the folder [Home>Resources>Corporate Governance](#)
- On the website www.alitalia.com at the following address:
<http://corporate.alitalia.it/it/compagnia/corporate-governance/index.html>

The same dissemination channels shall also apply to any subsequent updates / supplements to the Policy.

4. SUBJECT OF THE WHISTLEBLOWING REPORT

A Report shall concern the commission, or attempted commission, of any of the offences referred to in Legislative Decree 231/2001, or the violation or fraudulent avoidance of the principles and requirements set out in the Organisation and Management Model and/or of the ethical principles and the rules of conduct set out in the Company’s Code of Ethics.


5. REFERENCE PRINCIPLES

5.1 Guarantee of anonymity and protection

In order to encourage the recipients to promptly report any irregularities, Alitalia and the other Group Companies guarantee that the Report, and the relevant data, shall be kept confidential and that the identity of the reporter, or of whoever else files the Report, will not be disclosed, even if it is later be found to be erroneous or unsubstantiated.

The reporter, whose identity is never disclosed, is protected from any form of discrimination, penalisation and reprisal. The Supervisory Body, in fact, guarantees the absolute confidentiality and anonymity of the Whistleblower, without prejudice to the legal obligations and the protection of the rights of Alitalia and of the other Group Companies.

Alitalia, also on behalf of the other Group Companies, reserves the right to implement suitable actions against any person who takes or threatens to take retaliatory action against a reporter acting in accordance with this Policy, without prejudice, however, to the accused’s right to seek legal redress in the event of a criminal or civil action brought against the reporter, if his or her concerns or Reports are found to be false.

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5.2 Anonymity

Although the SB prefers Reports not to be anonymous, in accordance with the Code of Ethics, anonymous Reports are also allowed. In this case, the SB shall first of all assess the allegations contained in the Report, to determine whether they are legally substantiated and relevant, with respect to their duties; the SB takes into account only anonymous Reports that contain facts that are relevant to its duties, and not generic, confused and/or clearly defamatory accusations.

However it is of utmost importance to highlight that the protection granted to the Whistleblower, described in the following paragraph 5.3, will be granted only if the Report is not anonymous or, if the Report is filed through the web channel described in paragraph 6, as soon as the Whistleblower will reveal her/his identity.

5.3 Protection against discrimination

The Company shall not tolerate any kind of threat, reprisal, sanction or discrimination against the reporter, or whoever is involved in the fact-finding activities carried out to determine whether the Report is valid and substantiated. If an employee feels that he or she has been subjected to retaliation (sanctions, downgrading, dismissal, removal, changes to his or her work or to the workplace), for having reported any irregularities, he or she must provide a detailed Report on the discrimination to the SB, which will then investigate the matter, make assessments and, possibly, take the necessary measures, with respect to the person carrying out the reprisal, requesting his or her examination.

6. WHISTLEBLOWING REPORTING PROCEDURE

Whistleblowing Reports must be submitted to the Supervisory Body, either through one of the channels described hereafter or, in the case of employees, through the competent Function Chiefs (unless they are personally implicated in the Report), who must then promptly forward the original of the Report received to the Supervisory Body, in such a manner as to ensure confidentiality and protect the efficacy of the assessments and the personal integrity of the persons concerned by the Report.


Communications from the Whistleblower to the Supervisory Body, both for Alitalia and the other Group Companies, shall be preferably submitted via the EQS Integrity Line Platform (hereinafter also “Platform”) provided for this purpose and accessible at the following address:

<https://alitalia.integrityline.org>

The Platform, that is not part of the website or the intranet of Alitalia, is managed by EQS Group AG, as system administrator, and all data is stored in an encrypted manner, therefore granting the access only to the authorized Alitalia personnel (See par. 8 - Processing of Whistleblowing Reports). Thanks to the Platform it is possible to send Whistleblowing Reports, even anonymously, anyhow maintaining open a communication channel with the Alitalia personnel entitled to manage the Reports.

Alternatively, Reports can be addressed by ordinary mail to¹:

¹ For Alitalia CityLiner S.p.A. in a.s. the address is:

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- Organo di Vigilanza c/o Alitalia SAI S.p.A. in amministrazione straordinaria, Via Alberto Nasseti snc – 00054 Fiumicino (RM)

If the Report is filed outside the Platform, where the filling process is guided, any format is allowed, however, to facilitate its compilation the Company has prepared the template for a standard “Whistleblowing Report Form”, which is attached to this Policy.

The SB, being the body responsible for processing personal data, in accordance with the data protection regulations, requires that the data contained in the report forms, or other reporting format, must comply with the purposes referred to in Legislative Decree 231/2001.

Furthermore, in the detailed description of the conduct leading to the Report, no information must be provided that is not strictly relevant to the subject of the Report. In the event of a clearly false or malicious Report, the SB reserves the right to dismiss the complaint and delete the names and facts that might allow the identification of the persons implicated.

7. WHISTLEBLOWER’S RESPONSIBILITIES

This Policy is without prejudice to the criminal and disciplinary liability of the Whistleblower, in the event of a knowingly false or malicious and defamatory Report, pursuant to the Criminal Code and to art. 2043 of the Civil Code. Any abuse of this Policy, such as manifestly opportunist Reports and/or Reports made solely for the purpose of harming the person implicated by the Report and/or any other persons, besides any other instances of improper and deliberate use of this Whistleblowing Policy, shall also give rise to disciplinary and other forms of liability. It is understood that Alitalia and the other Group Companies may adopt the most suitable disciplinary and/or legal measures to protect its rights, assets and reputation against anyone who, acting in bad faith, submits false, unfounded or opportunist Reports, only aiming to a personal undue advantage, and/or for the sole purpose of slandering, defaming or harming the persons implicated or otherwise mentioned in the Report.

8. PROCESSING OF WHISTLEBLOWING REPORTS


The stages for processing a Whistleblowing Report are: reception, preliminary investigation and assessment and feedback to the reporter.

Reception: All the Reports are managed by the Alitalia Vice President Internal Audit (hereinafter also “VP Audit”), or by the personnel specifically delegated within the department (Case Manager). The Alitalia Supervisory Body and, if present, those of the Group Companies, assigned to the VP Audit the responsibility to manage also the Reports referring to non-compliances to the Organisation and Management Model. For this purpose the VP Audit, and/or the personnel specifically delegated within the department, access the Platform with personally assigned credentials to analyze the Reports submitted via the dedicated web

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- Organo di Vigilanza c/o Alitalia CityLiner S.p.A. in a.s., P.zza Almerico Schio – 00054 Fiumicino (RM)

For Alitalia Loyalty S.p.A. the address is:

- Organo di Vigilanza c/o Alitalia Loyalty S.p.A., P.zza Almerico Schio n.3 – 00054 Fiumicino (RM)

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based tool2. Residual Reports directly addressed to the SB via ordinary mail, or through the the competent Function Chiefs, will be timely forwarded to the VP Audit for both investigation and assessment.

Preliminary investigation and assessment: The VP Audit, and/or the personnel specifically delegated within the department, take care of the received Reports, assess them and propose specific deepening into the reported matters. All Reports are managed in the Platform that ensures their sequential numbering, the administration and documentation of each case, the retention of an adequate audit trail, and allows, once the investigation is closed and the Report is filed, also the automatic anonymization of personal data. Residual Reports received outside the Platform will be manually posted in the Platform by the VP Audit, and/or the personnel specifically delegated within the department, and managed accordingly. The VP Audit can communicate with the Whistleblower, even if anonymous, provided that the Report is filed via the Platform. In any case, he is allowed to interview any person eventually referred to in the Report. Once the investigation is finalized, the VP Audit reports the results to the SB that takes its reasoned decision, either dismissing the Report or requesting the Company to assess the disciplinary actions and sanctions, in respect of the matters, and/or the expedient actions regarding the MCOM.

The investigation by the VP Audit must be timely and accurate, based on the principles of impartiality, equity and confidentiality, vis-à-vis all the persons involved. During its investigation process, the VP Audit may request to the SB the assistance, if necessary, of any specialised external consultants, whose involvement is functional to the assessment of the Report, ensuring the proper confidentiality and – where possible – anonymity of any personal data contained in the Report.

At the end of this stage, the VP Audit prepares a report providing a summary account of the investigations carried out and the evidence collected to be presented to the SB which, based on the outcome, is shared with the corporate functions concerned, in order to define the action plans to be implemented and the actions to be carried out in order to protect the Company, also notifying the outcome of the investigations and assessment, in respect of each Report received, to the heads of the corporate departments concerned by the contents of the said Reports.


If, instead, at the outcome of the investigation, the allegations contained in the Report are found to be insufficiently detailed or, in any case, unsubstantiated and baseless, the Report is dismissed and filed on the Platform, also with a reasoned decision.

If the investigation finds serious and substantiated violations of the MCOM and/or the Code of Ethics, or if the SB suspects, on reasonable grounds, that an offence has been committed, the SB shall immediately notify the Report, and its assessments, to the Management Body and, where necessary, to the Internal Control Body, suggesting where deemed necessary to involve Judicial Authorities.

The SB periodically reports to the Management Body, at least once a year, on the types of Whistleblowing Reports received and the outcome of its investigation activities.

Feedback to the reporter: In order not to discourage future Reports by the recipients, the VP Audit shall confirm to the reporter, if the latter is identifiable and in any case if the Report is filed via the Platform, that

2 If the reported situation involves directly the VP Audit or the personnel specifically delegated, the platform allows, thanks to the function "Lock out Case Manager", by-pass the person involved and to address the report to a different Case Manager.

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the Report has been received and acknowledged, the sequential number given to it and the conclusion of the preliminary investigation.

9. WHISTLEBLOWING RECORDS

The VP Audit, and/or the personnel specifically delegated within the department, shall record all the Whistleblowing Reports it receives, in digital and/or scanned format, to ensure the full traceability of the documents, in respect of the fulfilment of responsibilities assigned by the SB.

The electronic documents are filed in the Platform, access to which is allowed only to the VP Audit, and/or the personnel specifically delegated within the department that are assigned with specific credentials.

The SB reserves the right to file any Reports found to be knowingly false or malicious, by deleting the names and any other information that may allow the identification of the persons implicated in the Report, in accordance with points 5.2 (anonymity) and 6 (whistleblowing reporting process) above.

The paper documents shall be stored in an identified location access to which is allowed to the VP Audit, and/or the personnel specifically delegated within the department.

10. GLOSSARY

Employees: all the employees of the Company, including its senior and middle managers.

Collaborators: any persons acting in the name and/or on behalf of the Company, on the basis of a document of engagement or other arrangement (by way of example and without limitation, financial promoters, interns, contract/project workers, temporary agency employees).

Consultants: professionals engaged to provide services to the company under consultancy agreements.

Alitalia Group: includes Alitalia – Società Aerea Italiana S.p.A. in a.s. and its Subsidiaries among which, for example, Alitalia CityLiner S.p.A. in a.s., Alitalia Loyalty S.p.A. and Challey LTD.



Whistleblowing: consists in the regulation of procedures aimed at encouraging and protecting Reports of irregularities by the employees, to protect the Company's integrity, as well as to prevent and repress any misconduct and wrongdoing.

Model/MCOM: the Organisation, Management and Control Model implemented pursuant to articles 6 and 7 of the Decree.


SB: the Supervisory Body is provided by article 6, paragraph 1, letter b) and 7 of Legislative Decree 231/2001, whose task it is to supervise the implementation of and compliance with the Model and to provide for its updating.

Report: a report containing any alleged misconduct, illegal acts, violations and any practice that conflicts with the Company's Code of Ethics and/or the Organisation, Management and Control Model.

Anonymous Report: a report submitted by an anonymous Whistleblower, whose identity is unknown and who cannot be traced.

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Malicious Report: a knowingly false or malicious report submitted solely to harm or, in any case, be detrimental to the character or repute of a recipient of the Code of Ethics and/or the Model.



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Employees or collaborators wishing to report any irregularities within the Company (such as acts of corruption or other offences provided by Legislative Decree 231/01 or violations to the Code of Ethics) which they have become aware of, in the fulfilment of their duties, must use the form below. Please be reminded that the law protects employees or collaborators who report any irregularities. In particular, the applicable law provides that:

- the Company must put into place suitable measures for protecting the confidentiality of the identity of the Whistleblower and preventing its disclosure;
- the identity of the Whistleblower must be protected from disclosure in all cases, in connection with the Whistleblowing;
- if the Whistleblower is subjected to reprisal at work, in connection with the Whistleblowing, he or she may report the fact to the SB.

Name of reporter:	
Job qualification or position:	
Area/division:	
Phone/mobile:	
Date/period in which the reported activity occurred:	
Place in which the reported activity occurred:	<input type="checkbox"/> Office/Department (specify location and address) <input type="checkbox"/> Outside the Office/Department (specify location and address)
I believe that the actions or omissions related to the Whistleblowing³	<input type="checkbox"/> Constitute a criminal offence <input type="checkbox"/> Violate the Code of Ethics or other regulations subject to disciplinary sanctions

³ The Report does not concern any personal complaints by the Whistleblower or claims/petitions that can be settled within the framework of the employment relationship regulations, or for which reference should be made to the disciplinary rules and procedures relevant to the HR management office.



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	<input type="checkbox"/> May seriously harm the Company's assets <input type="checkbox"/> May damage the Company's reputation <input type="checkbox"/> Other (specify)
<p>Provide a description of the irregularities:</p>
<p>Provide details of the alleged perpetrator⁴:</p>
<p>Provide details of other person(s) aware of the activity and/or who can provide relevant information⁵:</p>

Date, _____

Signature⁶

- _____
- 4 Specify the personal details, if known, or any other element that can be useful for identifying the perpetrator.
 - 5 Specify the personal details, if known, or any other element that can be useful for identifying the persons.
 - 6 The Report must be signed (N.B.: Anonymous Reports shall be examined only if adequately circumstantiated) and may be submitted as indicated in the Policy (Paragraph 6. WHISTLEBLOWING REPORT PROCESS)


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PRIVACY POLICY STATEMENT

(Art. 12 of Regulation (EU) 2016/679 and Legislative Decree 196/03, as amended by Legislative Decree 101/2018)

Alitalia – Società Aerea Italiana S.p.A. under special administration provides the following information on how it processes the personal details of any reporters, of the alleged perpetrators and of any other persons involved (the “parties concerned”), in relation to the handling and processing of the Reports received under its “Whistleblowing Policy”, as introduced by the Management Body.

1. Data Controller: Alitalia – Società Aerea Italiana S.p.A. under special administration, in the person of the legal representative, whose domicile, in connection herewith, is at the registered office of the Company at Via A. Nasseti s.n.c., Pal. Alfa, 00054 Fiumicino (RM) (hereinafter “Alitalia” or the “Data Controller”).
2. Data Protection Officer: the Data Controller has decided to appoint a Data Protection Officer (DPO), in connection with the data processing activities carried out by Alitalia, pursuant to article 37 of the EU Regulation, who may be contacted at the following address: Alitalia Data Protection Officer, Via A. Nasseti s.n.c., Pal. Alfa, 00054 Fiumicino (RM), or by email at dpo@alitalia.com.
3. Supervisory Body: the body provided in articles 6, paragraph 1 letter b), and 7 of Legislative Decree 231/2001, which is responsible for supervising the implementation of and compliance with the Model and for providing for its updating. The SB is also responsible for receiving the Reports and for examining them, with the assistance of Internal Audit.
4. Data Processor acting under the authority of the Controller: the Controller has designated the Vice President Internal Audit as the Processing Coordinator, in relation to the personal data related to the Reports.
5. Purpose of the processing and mandatory provision of the personal data of the parties concerned: the above mentioned data are processed in relation to the application of the above mentioned procedure, and to fulfil the legal obligations set out in the applicable domestic and EU laws and regulations. In particular, the processing operations shall be carried out to manage, process and further investigate and resolve the Reports received, and adopt the appropriate measures.
6. Local processing method: the data shall be processed manually and/or by means of automated instruments, based on the logic required to fulfil the above mentioned purposes and, in any case, which is capable of ensuring the security and confidentiality of the data. The Whistleblower’s identity shall always be protected and never disclosed to the alleged perpetrator, except as required by the law, in order to prevent any retaliation, threats, violence, etc. and protect the latter’s privacy.
7. Data subject’s rights: “provisions relating to the data subject’s rights, pursuant to Legislative Decree 101/2018 Art. 2 -undecies (Limitations to the data subject’s rights). The rights referred to in articles 15 to 22 of the Regulation shall not be exercised by means of a request to the Data Controller, or by lodging a complaint pursuant to article 77 of the Regulation, where the exercise of the said rights may harm the confidentiality of the Whistleblower’s identity, pursuant to Law 179/2017, in relation to any misconduct or illegal acts he/she becomes aware of in connection with the performance of his/her duties.



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1. Data Controller: Alitalia CityLiner S.p.A. under special administration, in the person of the legal representative, whose domicile, in connection herewith, is at the registered office of the Company at Via A. Nasseti s.n.c., Pal. Alfa, 00054 Fiumicino (RM) (hereinafter “Alitalia CityLiner” or the “Data Controller”).
2. Data Protection Officer: the Data Controller has decided to appoint a Data Protection Officer (DPO), in connection with the data processing activities carried out by Alitalia CityLiner, pursuant to article 37 of the EU Regulation, who may be contacted at the following address: Alitalia CityLiner Data Protection Officer, P.zza Almerico da Schio Pal. BRAVO, 00054 Fiumicino (RM), or by email at dpo@alitalia.com
3. Supervisory Body: the body provided in articles 6, paragraph 1 letter b), and 7 of Legislative Decree 231/2001, which is responsible for supervising the implementation of and compliance with the Model and for providing for its updating. The SB is also responsible for receiving the Reports and for examining them, with the assistance of Internal Audit.
4. Data Processor acting under the authority of the Controller: the Controller has designated the Vice President Internal Audit of Alitalia – Società Aerea Italiana S.p.A. under special administration as the Processing Coordinator, in relation to the personal data related to the Reports.
5. Purpose of the processing and mandatory provision of the personal data of the parties concerned: the above mentioned data are processed in relation to the application of the above mentioned procedure, and to fulfil the legal obligations set out in the applicable domestic and EU laws and regulations. In particular, the processing operations shall be carried out to manage, process and further investigate and resolve the Reports received, and adopt the appropriate measures.
6. Local processing method: the data shall be processed manually and/or by means of automated instruments, based on the logic required to fulfil the above mentioned purposes and, in any case, which is capable of ensuring the security and confidentiality of the data. The Whistleblower’s identity shall always be protected and never disclosed to the alleged perpetrator, except as required by the law, in order to prevent any retaliation, threats, violence, etc. and protect the latter’s privacy.
7. Data subject’s rights: “provisions relating to the data subject’s rights, pursuant to Legislative Decree 101/2018 Art. 2 -*undecies* (Limitations to the data subject’s rights). The rights referred to in articles 15 to 22 of the Regulation shall not be exercised by means of a request to the Data Controller, or by lodging a complaint pursuant to article 77 of the Regulation, where the exercise of the said rights may harm the confidentiality of the Whistleblower’s identity, pursuant to Law 179/2017, in relation to any misconduct or illegal acts he/she becomes aware of in connection with the performance of his/her duties.

<p>ALITALIA – SOCIETÀ AEREA ITALIANA S.p.A. in amministrazione straordinaria</p>  	<p>Annex:</p> <p>WHISTLEBLOWING REPORT FORM</p> <p>WHISTLEBLOWING POLICY</p>	<p>Date:</p> <p>01/07/2019</p>	<p>Code:</p> <p>Policy 5-2018</p>
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PRIVACY POLICY STATEMENT

(Art. 12 of Regulation (EU) 2016/679 and Legislative Decree 196/03, as amended by Legislative Decree 101/2018)

Alitalia Loyalty S.p.A. provides the following information on how it processes the personal details of any reporters, of the alleged perpetrators and of any other persons involved (the “parties concerned”), in relation to the handling and processing of the Reports received under its “Whistleblowing Policy”, as introduced by the Management Body.

1. Data Controller: Alitalia Loyalty S.p.A., in the person of the legal representative, whose domicile, in connection herewith, is at the registered office of the Company at P.zza Almerico Schio n.3, Pal. Bravo, 00054 Fiumicino (RM) (hereinafter “Alitalia Loyalty” or the “Data Controller”).
2. Data Protection Officer: the Data Controller has decided to appoint a Data Protection Officer (DPO), in connection with the data processing activities carried out by Alitalia Loyalty, pursuant to article 37 of the EU Regulation, who may be contacted at the following address: Alitalia Loyalty Data Protection Officer, P.zza Almerico Schio n.3, Pal. Bravo, 00054 Fiumicino (RM), or by email at dpo@alitalialoyalty.com.
3. Supervisory Body: the body provided in articles 6, paragraph 1 letter b), and 7 of Legislative Decree 231/2001, which is responsible for supervising the implementation of and compliance with the Model and for providing for its updating. The SB is also responsible for receiving the Reports and for examining them, with the assistance of Internal Audit.
4. Data Processor acting under the authority of the Controller: the Controller has designated the Vice President Internal Audit of Alitalia – Società Aerea Italiana S.p.A. under special administration as the Processing Coordinator, in relation to the personal data related to the Reports.
5. Purpose of the processing and mandatory provision of the personal data of the parties concerned: the above mentioned data are processed in relation to the application of the above mentioned procedure, and to fulfil the legal obligations set out in the applicable domestic and EU laws and regulations. In particular, the processing operations shall be carried out to manage, process and further investigate and resolve the Reports received, and adopt the appropriate measures.
6. Local processing method: the data shall be processed manually and/or by means of automated instruments, based on the logic required to fulfil the above mentioned purposes and, in any case, which is capable of ensuring the security and confidentiality of the data. The Whistleblower’s identity shall always be protected and never disclosed to the alleged perpetrator, except as required by the law, in order to prevent any retaliation, threats, violence, etc. and protect the latter’s privacy.
7. Data subject’s rights: “provisions relating to the data subject’s rights, pursuant to Legislative Decree 101/2018 Art. 2 -*undecies* (Limitations to the data subject’s rights). The rights referred to in articles 15 to 22 of the Regulation shall not be exercised by means of a request to the Data Controller, or by lodging a complaint pursuant to article 77 of the Regulation, where the exercise of the said rights may harm the confidentiality of the Whistleblower’s identity, pursuant to Law 179/2017, in relation to any misconduct or illegal acts he/she becomes aware of in connection with the performance of his/her duties.