



**POLICY FOR THE MANAGEMENT OF  
WHISTLEBLOWING REPORTS**

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## 1. PURPOSE OF THIS POLICY

By this policy (hereinafter also “**Policy**”), Interpump Group S.p.A. (hereinafter also “**Company**”) intends to govern at Group level the methods used to make and manage reports of alleged improper or unlawful actions that become known, regardless of how submitted or sent, even in an anonymous form.

More specifically, the objectives of this Policy are, on the one hand, to describe and govern the process of reporting alleged improper or unlawful actions, giving the Whistleblower (so-called **whistleblower**) clear, practical indications about the subject, content, recipients and methods for the transmission of whistleblowing reports, as well as about the forms of protection made available by the Company in compliance with the related regulations; and, on the other, to govern the methods used to verify the validity and truth of the whistleblowing reports received in order to take, if necessary, the appropriate corrective and disciplinary actions.

## 2. REGULATORY SOURCES WITH REGARD TO WHISTLEBLOWING REPORTS .

The principal Italian sources with regard to whistleblowing that apply to Interpump Group S.p.A. are contained in:

- Law 179 dated 30 November 2017, in force from 29 December 2017, on “*Instructions for the protection of persons who report improper or unlawful actions that come to their attention in the course of their working activities in the public or private sector*”;
- the version of the Code of Self-Regulation for listed companies approved by the Corporate Governance Committee in July 2015.

In particular, Law 179/2017 has recently made significant changes to Decree 231 dated 8 June 2001 on “*Regulations governing the administrative responsibility of legal persons, companies and associations, including those without legal form*”, by introducing specific instructions to govern the reporting of possible violations of Organization and Management Models, if adopted.

These instructions therefore apply to all legal entities that have adopted a 231 Organizational Model, making it possible to report violations of the Model and unlawful actions deemed significant pursuant to Decree 231/2001, and create a reporting system that is an integral part of the overall system of corporate governance, for the fundamental protection of the legal person concerned.

Specifically, the current version of art. 6, para. 2-*bis* of Decree 231/2001 establishes that: «*The models referred to in para. 1, letter a) envisage:*

- a) one or more channels for the parties indicated in art. 5, para. 1, letters a) and b), to present, for the fundamental protection of the entity, detailed reports about unlawful conduct deemed significant pursuant to this Decree that are founded on precise and mutually-consistent facts, or about violations of the Organization and Management Model of the entity, that come to their attention as a result of the functions performed by them; such channels guarantee, in managing each report, that the identity of the Whistleblower is kept confidential;*
- b) at least one alternate channel for reports to guarantee, with IT support, that the identity of the Whistleblower is kept confidential;*
- c) prohibition of direct or indirect reprisals and/or discrimination against the Whistleblower for reasons related, directly or indirectly, to the report;*
- d) penalties in the disciplinary system adopted pursuant to para. 2, letter e), for those who infringe the measures protecting the Whistleblower, as well as those who make unfounded reports willfully or with gross negligence».<sup>1</sup>*

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<sup>1</sup> In addition to para. 2-*bis* above, Law 179/2017 also added the following paras. 2-*ter* and 2-*quater* to art. 6 of Decree 231/2001, establishing:

For its part, the version of the Code of Self-Regulation for listed companies approved by the Corporate Governance Committee in July 2015 already established that «*The Committee believes, at least for Issuers listed on the FTSE-MIB, that an adequate system of internal control and risk management must include an internal system for employees to report any irregularities or violations of the applicable regulations and internal procedures (so-called whistleblowing systems), in line with national and international best practices, that guarantee a specific and confidential information channel, as well as the anonymity of the Whistleblower*».

### 3. DEFINITIONS

For the purposes of this Policy, the following terms have the meanings indicated below:

- a) **Group**, means the companies within the Interpump Group;
- b) **Whistle-blowing reports**, means any information, even if anonymous, about (i) violations or suspected/alleged violations of criminal law deemed significant pursuant and consequent to Decree 231/2001 and/or (ii) any conduct or practices that do not comply with the Code of Ethics of Interpump Group S.p.A. and/or the Code of Ethics of the Group, the Organization and Management Model adopted by each Group company pursuant to Decree no. 231/2001 or the set of procedures and systems adopted by the Group. The last mentioned includes, but is not limited to:
  - Environmental management system;
  - Occupational health and safety management system;
  - Procedures adopted pursuant to Decree 231/2001 or, in any case, referred to in the Organization and Management Model;
  - Procedures for the management and security of IT systems;
  - Procedures for accounting and financial management prepared to ensure compliance with Law 262/2005.
- c) **Whistleblower**, means the person who makes the Whistleblowing report, whether employee (including top management), collaborator, member of corporate bodies, third party (partner, customer, vendor, consultant, etc.) and, in general, anyone who has business relations with the Group;
- d) **Supervisory Body (SB)**, Means the body appointed by the Board of Directors pursuant to Decree 231/2001 that is active within Interpump Group S.p.A. and, if appointed locally, within other Group companies;

**Internal Audit Manager (“IA Manager”) of Interpump Group S.p.A.**, means the person appointed to carry out independent and objective assurance activities for the purpose of assessing and improving controls, risk management and corporate governance and, therefore, the effectiveness and efficiency of the business organization.

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«2-ter. The adoption of discriminatory measures against parties that make the reports referred to in para. 2-bis may be reported to the National Employment Inspectorate, for action to the extent of its responsibilities, by both the reporter and the trade union specified by the reporter.

2-quater. Dismissal as a reprisal/discrimination against the reporter is void. Changes of duties pursuant to art. 2103 of the Italian Civil Code are also void, as are any other reprisals or discriminatory measures adopted against the reporter. In the case of disputes linked to the imposition of disciplinary penalties, demotions, dismissals or transfers, or the subjection of the reporter to other organizational measures with direct or indirect adverse effects on his/her working conditions following presentation of the report, the employer must demonstrate that such measures were based on reasons unrelated to the report concerned».

#### 4. SCOPE OF APPLICATION OF THE POLICY

This policy is not limited to governing the whistleblowing reports received from the parties referred to in art. 5, para. 1, letters a) and b), of Decree 231/2001, as mentioned in art. 6, para. 2-*bis*, letter a), of that Decree<sup>2</sup>, referred to above, but also includes reports of unlawful conduct and/or irregularities received from Third Parties (i.e. vendors, consultants, customers and, in general, any external party that has contractual relations with Interpump Group S.p.A. and/or the other Group companies).

Interpump Group S.p.A. transmits this policy to the other Group companies, which - if they have already adopted or will adopt an Organization and Management Model - are required to adopt their own policy for the making and managing of whistleblowing reports, based on the principles contained in this Policy.

The adoption of this policy must be notified to the Supervisory Body and the Internal Audit Manager of Interpump Group S.p.A. on a timely basis.

Should certain Group companies required to adopt the above policy believe, not least having regard for the special characteristics of their activities, that they need to adopt different or additional rules with respect to those envisaged in this Policy, they must notify the Supervisory Body and the Internal Audit Manager of Interpump Group S.p.A. about this on a timely basis.

In all cases, compliance with the principles and rules set down in law remains mandatory. These aspects include ensuring that the identity of the Whistleblower is kept confidential, and prohibiting direct or indirect reprisals or discrimination against that person for reasons linked, directly or indirectly, to the Whistleblowing report made.

#### 5. WHISTLEBLOWING REPORTS

##### 5.1 Object and content of Whistleblowing reports

The following must be reported if they become known as part of and/or as a result of or, in any case, in the context of an employment/collaboration or commercial relationship with Interpump Group S.p.A. and/or other Group companies and might, directly or indirectly, result in economic, financial and/or reputational losses for the Group:

- (i) violations or suspected violations of the criminal law deemed significant pursuant and consequent to Decree 231/2001;
- (ii) any conduct or practices that do not comply with the Code of Ethics of Interpump Group S.p.A. and/or the Code of Ethics of the Group, the Organization and Management Model adopted by each Group company pursuant to Decree no. 231/2001, or the set of internal procedures adopted by Interpump Group S.p.A. and each Group company, as referenced by the respective Organization and Management Models<sup>3</sup>.

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<sup>2</sup> Being, respectively, by persons whose functions are to represent, administer or manage the entity or one of its organizational units having financial and functional independence, or who perform, even on a de facto basis, the related management and control functions [text of art. 5, para. 1, letter a), of Decree 231/2001]; b) by persons subject to the management or supervision of one of the parties indicated in letter a) [text of art. 5, para. 1, letter b), of Decree 231/2001].

<sup>3</sup> Pursuant to art. 3, paras. 1, 2 and 3, of Law 179/2017 on "*Extension of the regulations governing the obligation to maintain secrets of a job-related, business, professional, scientific and industrial nature*": «1. In the case of reports or complaints made in the manner and within the limits established in art. 54-bis of Decree 165 dated 30 March 2001 and art. 6 of Decree 231 dated 8 June 2001, as amended by this Law, efforts to safeguard the integrity of public and private administrations, and to prevent and impede embezzlement, represent just cause for the disclosure of information covered by the obligation to maintain secrets referred to in arts. 326, 622 and 623 of the Italian Criminal Code and art. 2105 of the Italian Civil Code. 2. The provisions of para. 1 do not apply if the obligation to maintain a professional secret applies to those who become aware

Whistleblowing reports may also be received in an anonymous form.

In all cases, however, Whistleblowing reports must be detailed and founded on precise and mutually-consistent facts, supported by evidence, and contain all useful information, so that the necessary verification work and checks can be carried out to determine their validity.

Accordingly, it is important that the Whistleblower:

- states where and when the reported facts took place, in a clear, complete and detailed manner;
- indicates personal details or other information for the identification of those who did the reported deeds;
- names any other persons who may be able to comment on the reported facts;
- indicates/provides supporting documentation to confirm the validity of the Whistleblowing report;
- provides any other useful information or evidence to support the validity of the matter reported.

## 5.2 Submission of Whistleblowing reports

Interpump Group S.p.A. and the Group companies that have already adopted or will adopt an Organization and Management Model have established suitable communication channels to guarantee that the identity of the Whistleblower is kept confidential and that the related Whistleblowing reports (even if anonymous) are managed properly.

Whistleblowing reports must be sent to the Supervisory Body of the companies concerned using the following channels:

with regard to the Supervisory Body of Interpump Group S.p.A.

- via e-mail to: [organismodivigilanza@interpumpgroup.it](mailto:organismodivigilanza@interpumpgroup.it);
- by ordinary mail to the following postal address: Interpump Group S.p.A., c/o Supervisory Body, via E. Fermi 25 - 42049 S. Ilario d'Enza, Reggio Emilia, Italy;
- verbally.

with regard to the Supervisory Body of Interpump Hydraulics Group S.p.A.

- via e-mail to: [organismodivigilanza@iph.it](mailto:organismodivigilanza@iph.it);
- by ordinary mail to the following postal address: Interpump Hydraulics S.p.A., c/o Supervisory Body, via Mingozzi 6 – 40012 Calderara di Reno (BO), Italy;
- verbally.

with regard to the Supervisory Body of Walvoil S.p.A.

- via e-mail to: [organismodivigilanza@walvoil.com](mailto:organismodivigilanza@walvoil.com);
- by ordinary mail to the following postal address: Walvoil S.p.A., c/o Supervisory Body, via Adige 13 - 42124 Reggio Emilia, Italy;

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of the information as a consequence of a professional consultancy or support relationship with the entity, business or natural person concerned. 3. When information and documents communicated to the body designated to receive them are secrets of a business, professional or job-related nature, it is a violation of the related secrecy requirement to make revelations in an excessive manner with respect to the desire to remove the unlawful action and, in particular, to make the revelation outside of the communication channel specifically established for that purpose».

- verbally.

with regard to the Supervisory Body of IMM Hydraulics S.p.A.

- via e-mail to: odv.imm@outlook.it;
- by ordinary mail to the following postal address: IMM Hydraulics S.p.A., c/o Supervisory Body, viale Italia 49 – 66041 Atessa (CH), Italy;
- verbally.

### 5.3 Tasks and responsibilities

The Internal Audit Manager of Interpump Group S.p.A. is responsible for applying, updating and amending this Policy.

The Supervisory Body is mandated to receive and manage the Whistleblowing reports addressed by this Policy.

The Supervisory Body is responsible for:

- the preliminary verification/analysis of the Whistleblowing reports received (even if anonymous), for the purpose of evaluating their validity and the need for any further investigation;
- deciding whether or not to carry out additional checks or move to the next phase of verification.

Accordingly, following the initial verification stage, the Supervisory Body classifies the Whistleblowing reports as:

- **Type A reports:** detailed and significant Whistleblowing reports that require action (investigation or remediation) on a prompt basis (within 48 hours);
- **Type B reports:** detailed and significant Whistleblowing reports that require action (investigation or remediation) on an urgent basis (within 5 working days);
- **Type C reports:** detailed and significant Whistleblowing reports that require action (investigation or remediation) that is not urgent (within 10 working days);
- **N.A. reports:** unreliable Whistleblowing reports to be filed (those without sufficient/significant information to warrant further investigation);
- **"Bad faith" reports:** Whistleblowing reports that are blatantly opportunistic and/or made willfully or with gross negligence, to be forwarded to the competent functions for determination of the action to be taken against the Whistleblower, if any.

If a Whistleblowing report warrants further analysis, the Supervisory Body activates the investigation phase including, if appropriate, by sending the documentation received to the functions that it deems necessary to involve.

If the Whistleblowing report is transmitted to other structures/functions/third parties for the performance of investigative work, only the content of the report must be sent without any references, even indirectly, to the identity of the Whistleblower, unless this is not possible in view of the characteristics of the investigation to be performed. In that case, the parties involved in support of the Supervisory Body are bound by the same duty to guarantee that the identity of the Whistleblower is kept confidential.

The contacted functions are responsible for carrying out all necessary checks and sending a report to the Supervisory Body on the investigative work performed and the outcome of the checks made.

Based on the information provided, the Supervisory Body considers:

- whether or not to file the Whistleblowing report, given the objective absence of any illegal and/or improper conduct, or the absence of any evident and/or reasonable basis for carrying out further investigations;
- whether or not to commence an audit or fraud investigation;
- whether or not to involve the judicial authorities;
- whether or not to involve administrative bodies or independent authorities responsible for supervision and control (e.g. Consob);
- which business functions to involve, if any, in the case of Whistleblowing reports made in "bad faith" (being Whistleblowing reports that are blatantly opportunistic and/or made willfully or with gross negligence), in order to determine what action to take against the Whistleblower, if any.

If a Whistleblowing report is found to be valid, Interpump Group S.p.A. takes all necessary measures and actions to protect the Company.

The Supervisory Body also considers whether or not it is appropriate to give feedback to the Whistleblower.

The Supervisory Body must ensure:

- the traceability of the Whistleblowing reports and the related investigative activities;
- the retention in hard-copy/electronic files of the documentation regarding the Whistleblowing reports and the related verification work, ensuring appropriate levels of security/confidentiality;
- the retention of the Whistleblowing reports and related documentation for no longer than necessary for the purposes for which the data was collected or subsequently processed and, in any case, in accordance with this Policy and the privacy procedures adopted by the Group.

The functions involved in the activities to verify the validity of the Whistleblowing reports ensure, to the extent of their responsibilities, the traceability of the data and the information, and arrange to retain and file the hard-copy and electronic documentation produced so that the various phases of the verification process can be reconstructed.

Without prejudice to the requirement to disclose certain events on a timely basis, the Supervisory Body of Interpump Group S.p.A. provides an annual summary of Whistleblowing reports received and managed:

- to the Board of Directors;
- to the Board of Statutory Auditors;
- to the Audit and Risk Committee;
- to the firm appointed to perform the legal audit of the accounts.

With regard to the other Group companies, without prejudice to the requirement to disclose certain events on a timely basis, the respective Supervisory Bodies provide an annual summary of Whistleblowing reports received and managed:

- to the Board of Directors;
- to the Board of Statutory Auditors;
- to the firm appointed to perform the legal audit of the accounts;
- to the Supervisory Body and the Internal Audit Manager of Interpump Group S.p.A.

#### **5.4 Confidentiality and prohibition of reprisals and/or discrimination**



Interpump Group S.p.A. and each Group company ensure, in the manner described above, that all Whistleblowing reports with the characteristics specified in para. 5.1 are received for examination, even if - as stated - they are made in an anonymous form.

The Supervisory Body guarantees that the identity of the Whistleblower is kept confidential from the moment the Whistleblowing report is received for examination, not least to avoid all risk of reprisals and/or discrimination against the latter.

Without prejudice to the rights attributable to the Whistleblower pursuant to art. 15 et seq. of Regulation (EU) 2016/679, the Whistleblowing report and attached documentation cannot be made available for examination, copied or provided in extract form upon request.

Except in cases of liability for slander or defamation pursuant to the Italian Criminal Code or art. 2043 of the Italian Civil Code, or in cases in which anonymity is set aside by law (e.g. criminal, tax or administrative investigations, inspections by supervisory authorities), the identity of the Whistleblower is always protected in each phase subsequent to presentation of the Whistleblowing report; accordingly, with the exceptions specified above, the identity of the Whistleblower may not be revealed without express consent from that person.

In the context of disciplinary proceedings, in particular, the identity of the Whistleblower may only be revealed to the manager of the business function responsible for them and/or to the accused if:

- express consent is given by the Whistleblower;
- or the disciplinary charge is founded solely on the Whistleblowing report and knowledge of the identity of the Whistleblower is absolutely essential for the defense of the accused, as requested and justified by the latter in writing. In this case, the manager of the business function responsible for the disciplinary proceedings evaluates the request made by the accused and determines if knowledge of the identity of the Whistleblower is absolutely essential for the defense. If deemed justified, the function manager must present a reasoned request to the Supervisory Body, stating clearly and precisely why it is essential to know the identity of the Whistleblower.

The manager of the business function responsible for the disciplinary proceedings has the same duty to guarantee that the identity of the Whistleblower is kept confidential as the members of the Supervisory Body.

In all cases, the personal data of the persons involved and/or cited in Whistleblowing reports made pursuant to this Policy is processed, to the extent compatible, in compliance with current regulations and the corporate privacy policies<sup>4</sup>.

Interpump Group S.p.A. and each Group company do not allow or tolerate in relation to Whistleblowers any direct or indirect reprisals and/or discrimination with effects on their working conditions for reasons related, directly or indirectly, to the Whistle-blowing report. Reprisals and discrimination are understood to mean all unjustified disciplinary action, and all other reprisals that result in a downgrade in working conditions<sup>5</sup>.

Violation of the confidentiality requirement and/or reprisals or discrimination against the Whistle-blower are punished by disciplinary action, without prejudice to any additional liabilities arising under the law.

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<sup>4</sup> See Annex 1 for the privacy information provided pursuant to this Policy.

<sup>5</sup> See above, note 1.

Reprisals or discrimination with an effect on the working conditions of those who collaborate in checking the validity of the Whistle-blowing report are also prohibited.

Persons who believe they have suffered discrimination for having reported an unlawful action or irregularity must inform the Supervisory Body, giving detailed information. If found credible, the latter notifies the alleged discrimination to the structures, functions or bodies concerned.

Without prejudice to the above, all forms of abuse of this Policy, such as Whistle-blowing reports that are unfounded, blatantly opportunistic and/or made willfully or with gross negligence (so-called "Bad faith" reports), are also punished by disciplinary action.

## **6. RECIPIENTS OF THIS POLICY**

This Policy is disseminated as widely as possible.

Accordingly, it is made available on the company intranet, posted on noticeboards and sent to all employees of Interpump Group S.p.A. and Group companies who have an e-mail address.

The methods of contacting the Supervisory Bodies of Interpump Group S.p.A. and the other Group companies are also made available on the corporate website.

The Supervisory Body identifies the most appropriate action to ensure the maximum dissemination of this Policy and the proper understanding of its contents.

## **7. ENTRY INTO FORCE**

This Policy comes into force on 3 August 2018.

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**PRIVACY NOTICE - POLICY FOR THE MANAGEMENT OF WHISTLEBLOWING REPORTS****pursuant to art. 13 of Regulation (EU) 2016/679**

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**DATA CONTROLLER**

The Data Controller is Interpump Group S.p.A. with registered offices at Via Fermi 25 - 42049 S. Ilario D'Enza (RE), Italy.

**CATEGORY OF PERSONAL DATA**

Pursuant and consequent to the provisions of art. 13 of Regulation (EU) 2016/679 on the protection of personal data (hereinafter also "GDPR"), we hereby inform you that the personal data processed by us pursuant to our "Policy for the Management of Whistleblowing Reports" will be, if provided, limited to those of your identity/identification details deemed strictly necessary to verify the truth of the Whistleblowing report and to manage it.

**PURPOSES OF PROCESSING**

Your personal data will be processed for purposes related to the management of reports on alleged irregularities or unlawful actions that came to your attention in the context of the working relationship, in compliance with our "Policy for the Management of Whistleblowing Reports".

**LAWFULNESS OF PROCESSING**

The lawfulness of processing your personal data, provided when reporting alleged irregularities or unlawful actions that came to your attention in the context of the working relationship, in compliance with our "Policy for the Management of Whistleblowing Reports", is - in relation to Interpump Group S.p.A. which has adopted an Organization and Management Model - founded on the legal obligation arising pursuant to art. 6 of Decree 231/2001, as amended by Law 179/2017 on "*Instructions for the protection of persons who report improper or unlawful actions that come to their attention in the course of their working activities in the public or private sector*", and on the version of the Code of Self-Regulation for listed companies approved by the Corporate Governance Committee in July 2015.

The provision of your personal data is not mandatory, but any refusal may make it impossible or extremely difficult to verify the truth of the Whistleblowing report made, if that report is not detailed, founded on precise and mutually-consistent facts, is not supported by verifiable evidence and/or does not contain all the information needed to carry out the above verification work.

## **AUTHORIZATIONS FOR PROCESSING**

The data provided by you will be processed by “Persons in charge of the processing”, authorized by Interpump Group S.p.A. in compliance with the procedures established by the “Data Processors” and the rules established by the “Data Controller”, in accordance with current regulations [Regulation (EU) 2016/679], guaranteeing respect for the principles of lawfulness, propriety and relevance.

The authorizations for processing are monitored by the “Data Protection Officer” (DPO) appointed by Interpump Group S.p.A.

## **RECIPIENTS/CATEGORIES OF RECIPIENT OF PERSONAL DATA**

The recipient of your personal data is the Supervisory Body of Interpump Group S.p.A. which, in compliance with the relevant current regulations and the “Policy for the Management of Whistleblowing Reports” adopted by the Company, is required to guarantee that the identity of the Whistleblower is kept confidential.

Your personal data may be sent to other corporate structures and/or functions during work to verify the truth of the report, should this be necessary in order to carry out the related investigations, having regard for the characteristics of that activity. In that case, the parties involved in support of the Supervisory Body are bound by the same duty to guarantee that the identity of the Whistleblower is kept confidential.

Your personal data may only be revealed to the manager of the business function responsible for the disciplinary proceedings and/or to the accused if:

- you have given your express consent;
- or the disciplinary charge is founded solely on your Whistleblowing report and knowledge of the identity of the Whistleblower is absolutely essential for the defense of the accused.

In the relevant circumstances, your personal data may also be communicated to third parties (e.g. judicial authorities, investigative bodies, etc.).

Your personal data will never be disseminated.

## **TRANSFER OF DATA TO NON-EU COUNTRIES**

Your personal data will not be transferred to non-EU countries.

## **PROTECTION OF RETENTION OF THE DATA COLLECTED**

The personal data collected for the above purposes will be retained by us for the time necessary to verify the truth of the Whistleblowing report and, if necessary, for adoption of the resulting disciplinary measures and/or the completion of any dispute processes that arise from the Whistleblowing report. Subsequently, your data will be erased (right to be forgotten) or rendered anonymous (pseudonymized), if this is necessary for statistical or record-keeping purposes.

## **RIGHTS OF THE DATA SUBJECT**

With regard to the above data processing, you - as the Whistleblower - may exercise the rights granted in art. 15 et seq. of Regulation (EU) 2016/679, to the extent compatible with the whistleblowing regulation.

You may exercise your rights by sending a request by e-mail to [privacy@interpumpgroup.it](mailto:privacy@interpumpgroup.it) or by ordinary mail to the registered offices of the Company.

#### **OUR CONTACT PERSONS**

FULVIO MONTIPO'

as the Legal Representative of Interpump Group S.p.A., which is the independent "Data Controller" (*e-mail address: [privacy@interpumpgroup.it](mailto:privacy@interpumpgroup.it)*)

MAURIZIO MONTANARI

as the "Data Processor" appointed by Interpump Group S.p.A.

FRANCESCO MASIELLO

as the "Data Protection Officer" (DPO) appointed by Interpump Group S.p.A. (*e-mail address: [dpo@interpumpgroup.it](mailto:dpo@interpumpgroup.it)*)