## PRIVACY POLICY for the processing of personal data related to QUALIFIED REPORTS

In accordance with art. 13, Legislative Decree no. 196 of June 30, 2003 containing provisions on the protection of personal data (hereinafter "Legislative Decree no. 196/2003"), Finmeccanica - Società per azioni, (hereinafter "Company") in its role as Data Controller, in connection with your personal data acquired as part of the management of the reports referred to in the document called "Whistleblowing Management Guidelines" made available on the Company's website, makes known the following.

- 1. Categories of processed data: The processing concerns personal data acquired through the receipt of your disclosure. The collected data concern in particular personal data that allow for the identification of the authorship of the disclosure and the content of the statement made with it.
- 2. Purposes and methods of processing: The processing of the data is aimed at the management of what is envisaged by the "Whistleblowing Management Guidelines"; specifically the processing is performed for defensive purposes, for internal control of the Company and for the monitoring of corporate risks in implementation of what is envisaged by the mentioned document, as well as by the related company protocols and by the applicable laws.

In connection with the described purposes, the data is processed through the operations or set of operations indicated in art. 4, paragraph 1, letter a. of Legislative Decree 196/2003 and is done using manual or electronic tools, according to logics closely connected with the purposes indicated above and, in any case, so as to guarantee the maximum security and confidentiality of the data, as well as with methods and precautionary measures such as to guarantee the anonymity of the author of the disclosure.

- 3. Data storage: Paper or electronic documentation related to the disclosures is stored for a period of 10 years or for the time needed to pursue the indicated objectives.
- 4. Data Controller and Data Processor: The Data Controller of the personal data referred to in this privacy policy is Finmeccanica Società per azioni headquartered in Rome, Piazza Monte Grappa n. 4. The Data Processor is the Surveillance Body of Finmeccanica Società per azioni at the registered office of the Company, to whom the data subjects can turn at any time to exercise the rights provided for in article 7 of the Code. The updated list of Data Processors can be consulted through the list available at the offices of the Data Controller, each with respect to their area of competence.
- 5. Scope of communication and dissemination: In order to pursue the objectives described in section 2, the data will be processed by the Surveillance Body of Finmeccanica Societ per azioni, by the Disclosure Committee referred to in the "Whistleblowing Management Guidelines" and by the appointed personnel belonging to the Group Internal Audit and Security organizational units of Finmeccanica, and they may be communicated to the corporate bodies of the Company and to personnel of the Company if necessary also appointed for the purpose of proceeding with activation of legal and/or disciplinary protection connected with the disclosure. Furthermore, the data might also have to be communicated to the Judicial Authority and Judicial Police.
- 6. Nature of the conferment of the data and consequence of refusal to respond: Considering that even anonymous disclosures are legitimate, the conferment of the personal data related to the processing in question is optional. Possible refusal in this sense will prevent the Company from taking the qualified disclosure into consideration, without prejudice in any case to the option of resubmitting the disclosure in anonymous form.
- 7. Rights of the data subject: Finally, please note that the regulations on the protection of personal data give data subjects the possibility of exercising specific rights, by addressing their requests to the Data Processor, at the Company's registered office, in accordance with art. 7 of Legislative Decree no. 196/2003. provided below in its entirety for quick consultation:

"Legislative Decree no. 196 of June 30, 2003 – Art. 7: Right of access to personal data and other rights

- 1. The data subject has the right to obtain confirmation of the existence or not of personal data that concerns him/her, even if not yet recorded, and their communication in intelligible form.
- 2. The data subject has the right to obtain indication of:
- a) the origin of the personal data;
- b) the processing purposes and methods;
- c) the logic applied in case of processing carried out with the aid of electronic tools;
- d) identification of the controller, of the supervisors and of the designated representative in accordance with article 5, paragraph 2;

- e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their role as designated representative in the State, of supervisors or persons in charge.
- 3. The data subject has the right to obtain:
- a) the updating, correction or, if interested therein, supplement of the data;
- b) the deletion, transformation into anonymous form or blocking of data processed in violation of law, including data that do not need to be stored in relation to the purposes for which they were collected or subsequently processed;
- c) the declaration that the operations referred to in letters a) and b) have been brought to the attention, even as regards their content, of those to whom the data were communicated or disclosed, with the exception of the case in which such compliance is impossible or involves the use of means that are manifestly disproportionate with respect to the protected right.
- 4. The data subject has the right to oppose, entirely or in part:
- a) the processing of his/her personal data for legitimate reasons, even if pertinent to the purpose of the collection;
- b) the processing of personal data concerning him/her for the purposes of sending advertising or direct sales material or for carrying out market research or commercial communication."

Nevertheless, we should remind you that these rights cannot be exercised, in accordance with the provisions of art. 8 of Legislative Decree no. 196/2003 Privacy Code, during the period in which this may cause actual, concrete damages to defensive investigations or to establish or defend a right in court of the Controller or of a third party; this also applies when it does not concern objective data, but rather the correction or supplement of personal data of an evaluation nature, related to judgments, opinions or other subjective considerations, as well as the indication of conduct to be adopted or of decisions being taken by the Data Controller.

FINMECCANICA - Spcietà per azioni

Group General Counsel
(Audrea Parrella)

## SECTION TO BE FILLED OUT BY THE PERSON MAKING THE DISCLOSURE – TO BE RETURNED DULY SIGNED ALONG WITH THE DISCLOSURE

## AUTHORIZATION AND CONSENT TO THE PROCESSING OF PERSONAL DATA

accordance with - Società per az provisions of the	art. 13 of Legislative Decree. no. 196/2003 ioni comes into possession as part of the ne document "Whistleblowing Management	having taken note of the Privacy Policy in for the processing of personal data of which Finmeccanical nanagement of the DISCLOSURES in accordance with the Guidelines", expressly gives consent to the processing of	i F
		ated in the above-mentioned Privacy Policy, including the and for the purposes envisaged in the Policy	)
	Gives consent	☐ Denies consent	
Place:	Date:	Signature:	