



NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF THE GENERAL DATA PROTECTION REGULATION EU/2016/679 (GDPR)

Premise

Gelesis has activated, in compliance with current regulatory provisions, a reporting management system aimed at combating conduct, carried out by anyone, in violation of laws and regulations as well as the Code of Ethics and the provisions of the organization, management and control model adopted by the Company, and to allow the pursuit of the interest in the integrity of the Company's administration and the protection of interests, the fundamental rights and freedoms of all those who, for various reasons, work in the name and on behalf of the Company or with the same establish relationships of a professional and working nature or receive assistance and care from the same.

In order to ensure the highest standards of protection and maximum confidentiality of personal data relating to reports, we inform you that they are managed exclusively by persons of proven independence, specifically authorized, and through the use of an IT platform owned by third parties and, therefore, unrelated to the Company's corporate domain.

This document illustrates the purposes and methods of processing personal data managed by the Company in the context of reports and the rights that can be exercised by the Data Subjects.

1. Data Controller

Gelesis Srl – P.IVA 06508451215 – is the data controller, in the person of its legal representative pro-tempore (*Company or Data Controller*).

It is possible to contact the Data Controller, by ordinary mail, at its headquarters in via Europa 187, ZI – SP26 – 73021 Calimera (LE) Italy or through the e-mail address: EUprivacy@gelesis.com

2. Purpose of the processing

The purposes of the processing are as follows:

- a) management of the internal procedure relating to the receipt and examination of reports and verification of their merits;
- b) definition and execution of the appropriate investigative activities relating to the reports examined;
- c) management of communications with the subjects who make reports (so-called: *Whistleblowers*);
- d) transmission of conclusions to the competent company bodies for the sanctioning profiles of any irregular conduct ascertained or filing of the conclusions themselves.

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3. Types of personal data

The management of reports may normally involve the processing of the following types of personal data:

- common data of the Whistleblower (*): personal data, generally referring to names, contact details of residence and/or contact (telephone numbers, e-mail addresses, etc.), relational area with the Company (employee, collaborator, supplier, patient, etc.), voice recordings, etc.

() The aforementioned common data of the Whistleblower will be processed if and to the extent that the Whistleblower has intended to communicate the same, since it is also possible to forward the report anonymously or without elements that can identify or make the Whistleblower identifiable.*

- common data of third parties: personal data, generally referring to names, contact details of residence and / or contact (telephone numbers, e-mail addresses, etc.), relational area with the Company (employee, collaborator, supplier, patient, etc.) of other subjects who may be authors of the conduct being reported or injured parties or observers or connoisseurs of the same conduct.

It is also possible that the report contains the following additional types of personal data:

- Common Data of third parties relating to images or video footage of other subjects who may be the authors of the conduct being reported or injured parties or observers or connoisseurs of the same conduct;
- Special Categories of Data, capable of revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as processing genetic data, biometric data intended to uniquely identify a natural person, data concerning health or the sex life or sexual orientation of the person as well as data suitable for detecting physical or psychological behavior and habits of living or consumption or belonging to protected categories;
- Judicial Data: data on criminal records, the registry of administrative sanctions dependent on a crime and the related pending charges, or the status of accused or suspect, conditional release, prohibition / obligation to stay, alternative measures to detention and other information relating to personal judicial conditions.

4. Nature of the provision of personal data and legal bases of processing

The provision of personal data necessary for the pursuit of the purposes referred to in paragraph 2 letters a) to b) is mandatory and any refusal will make it impossible for the Company to follow up on the advanced report.

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The provision of personal data necessary for the pursuit of the purposes referred to in paragraph 2 letters c) to d) is optional and any refusal could result – pursuant to art. 1 paragraph 3 of Law no. 179/2017 – the unusability of the report in the context of disciplinary proceedings, possibly initiated, based in whole or in significant part on the report itself.

The lawfulness of the processing, carried out by the Data Controller, for the purposes referred to in paragraph 2, is to be found in the provisions of art. 6 GDPR as specified below:

- the processing referred to in paragraph 2 letters a) to c) are carried out for the need to fulfill legal obligations to which the Data Controller is subject [GDPR art. 6 paragraph 1, letter c)];
- the same treatments referred to in the previous point that contemplate the communication of identification data of the Whistleblower are based on the consent freely expressed by the same [GDPR art 6 paragraph 1, letter a].

In this case, it will be possible at any time - by the Whistleblower - to exercise the right to withdraw consent, using the contact details indicated in this information or the communication area on the platform. This will make it impossible for the Data Controller to continue using personal data for the communication purposes indicated, without however affecting the lawfulness of the processing based on consent before the revocation.

- the processing referred to in paragraph 2 letter d) and, also the aforementioned letters a) to c), are carried out for the legitimate interest of the Data Controller represented by the pursuit of the interest in the integrity of the Company's administration assessed the interests or fundamental rights and freedoms of the Data Subject regarding the protection of personal data [GDPR art 6 paragraph 1, letter f];

5. Processing methods

The processing of personal data is allowed only to subjects (authorized figures), indicated below, of proven independence who, on behalf of the Company, manage reports through storage, reading and examination, extraction and processing, transmission and archiving.

Specifically, the Company has identified the Supervisory Body, appointed pursuant to art. 6 of Legislative Decree no. 231/2001, the person responsible for receiving and examining reports, in accordance with the regulations provided for by its whistleblowing policy.

Furthermore, as part of a multinational Group, it cannot be excluded that reports may be received from the parent company Gelesis Holding Inc. regarding the Company and/or subjects operating in the name and on behalf of or in the interest of the same. In compliance with the procedures provided for by the similar system for receiving reports for Gelesis Holding Inc. , it is envisaged that

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complaints referring to Gelesis Srl are transferred to the competence of the Supervisory Body and processed in accordance with the aforementioned policy whistleblowing.

The processing is carried out with the aid of a certified e-mail tool, external to the company domain and / or by means of paper tools whose care, management and conservation is entrusted, exclusively, to the Supervisory Body.

To this end, the Supervisory Body is authorized – pursuant to art. 2-quaterdecies of Legislative Decree no. 196/2003 – to the processing of personal data relating to reports.

In the face of any reports, in any way received, appropriate technical and organizational measures are taken to ensure the protection and confidentiality of such documentary evidence.

6. The recipients of the data

In cases where – for investigative and ascertainment purposes – it is necessary to communicate the reported facts to other subjects, communications will be sterilized by elements that may make the Reporter identifiable, subject to the consent of the Whistleblower himself.

At the end of the preliminary and assessment activities conducted by the authorized figures, personal data – within the limits indicated in paragraph 4 – are communicated to the competent company bodies for the evaluation of any sanctioning profiles.

For the pursuit of the purposes referred to in paragraph 2, the personal data contained in the reports may, finally, be communicated to the Judicial Authority or other external Authorities, according to the methods required by current legislation.

In cases where the reports refer to the conduct of subjects contractually linked to counterparties of the Company (consultants, suppliers and contractors, scientific partners, etc.), personal data may be communicated to the governing bodies of such counterparties.

No disclosure of personal data is permitted.

7. Transfer of data abroad

No transfer of personal data takes place outside the European Economic Area.

8. Data retention

Personal data will be kept for the entire period necessary to carry out the preliminary and verification activities.



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In the event of ascertained validity of the facts reported, personal data will be stored for a period of ten years (limitation period) without prejudice to the further term in the presence of legal proceedings initiated or in progress at this deadline. The retention of data will result in the prior deletion of any categories of personal data and / or judicial data not relevant or exceeding the purposes of the processing.

In the event of unfoundedness, personal data will be kept for a period of 12 months and subsequently deleted.

9. Rights of the Data Subjects

EU Regulation 2016/679 (articles 15 to 23) gives the Data Subject the exercise of specific rights aimed at access, opposition to the processing, correction or cancellation of personal data and portability of the same, subject to the limitations provided for by art. 2-undecies of Legislative Decree no. 196/2003 (Privacy Code).

At any time, the Data Subject may request to exercise their rights by contacting the Data Protection Officer at the e-mail address: dpo@miulli.it

The Data Subject can also lodge a complaint against the Supervisory Authority which in Italy is constituted by the Guarantor for the Protection of Personal Data.