



# PRIVACY POLICY

## ABOUT A WHISTLEBLOWING REPORT

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### PRIVACY POLICY

#### Pursuant to Art.13 of Reg.UE 2016/679 "General Data Protection Regulation" (GDPR)

All personal data managed in the context of reports are processed in accordance with current privacy regulations (EU Reg. 2016/679 "GDPR" and Legislative Decree 196/2003 as amended and supplemented by Legislative Decree 101/2018).

#### **Type of data processed**

All personal data contained in the reporting process are processed, therefore relating to the whistleblower, the reported, any additional subjects included in the report, as well as in any subsequent in-depth investigations. The person entering the data (usually the whistleblower) is responsible for the relevance, correctness and non-excessiveness of the data entered. The platform operator may delete any data that clearly does not comply with the general principles enshrined in Article 5 of the GDPR.

#### **Purpose and legal basis of data processing**

The data are processed for the purpose of proper management of reports, related regulatory compliance, feedback to the whistleblower and any in-depth investigations. The legal basis for the processing is to be found in Article 6, paragraph 1(c) "the processing *is necessary to comply with a legal obligation to which the Data Controller is subject*".

#### **Methods of data processing**

The data are processed in a manner and with tools designed to ensure maximum security and confidentiality. The identity of the whistleblower is protected in accordance with the provisions of Art. 12 of Legislative Decree 24/2023 "*Obligation of confidentiality*".

#### **Data Retention**

The data are processed for times compatible with regulatory requirements, with specific reference to Article 14 of Legislative Decree 24/2023 "*Retention of documentation relating to reports*": reports and related documentation are kept for the time necessary to process the report and in any case no longer than five years from the date of communication of the final outcome of the reporting procedure.

#### **Scope of data knowledge**

The data will only be accessible to formally designated, authorized and instructed parties, including: manager of the reporting channel, control bodies, internal collaborators, etc. In the event of investigations, the data may be known to the public authorities in charge. In general, the data may be disclosed within the scope of the provisions of Article 12 of Legislative Decree 24/2023.

#### **Data Controller and Rights of Data Subjects**

The Data Controller is the undersigned company, in the person of its pro-tempore Legal Representative. More information on whistleblowing can be found on the company website. It should be noted that the rights referred to in articles 15 to 22 of the GDPR may be exercised within the limits of the provisions of article 2-undecies of Legislative Decree 196/2003 "*Limitations on the rights of the data subject*", i.e. by contacting the Data Protection Authority directly.