



## **INFORMATION EX ART. 13 REGULATION 2016/679/EU ON THE PROCESSING OF PERSONAL DATA ACQUIRED AS PART OF REPORTS MADE PURSUANT TO LEGISLATIVE DECREE 24/2023**

Kind data subject,

we shall inform you that, according to the art. 13 Regulation (EU) 2016/679 (GDPR 2016/679), containing provisions for the protection of the processing of personal data of natural persons, as well as for the free movement of such data, the personal data you provide will be processed in compliance with the aforementioned legislation according to the principles of lawfulness, fairness, transparency and protection of your privacy and your rights, with particular reference to integrity, confidentiality, personal identity and the right to protection of personal data.

### **Categories of personal data processed**

The personal data processed, attributable to the whistleblower, the reported person and any third parties, may include both "common" and special data pursuant to art. 9 GDPR and any data relating to criminal convictions and offences.

### **Purposes of the processing**

The personal data provided may be processed for the following purposes:

- Receipt, analysis and evaluation of a report made pursuant to Legislative Decree 24/2023;
- Management of relations with the whistleblower (e.g. asking for clarifications or additions, communicating the outcome of the investigation)
- Establishment of the reported facts Adoption of adequate protection measures to avoid retaliatory effects towards the whistleblower and the subjects referred to in art. 3 no. 5 letters a), b), c) and d) of Legislative Decree 24/2023
- Possible exercise of disciplinary power
- Exercise, protection or defence of a right, including in court.

### **Reporting manager**

The reports made pursuant to Legislative Decree 24/2023 will be managed by Alfa Solutions S.p.A.

### **Legal basis**

The legal bases legitimizing the processing of data are constituted by:

- Fulfilment of a legal obligation pursuant to Art. 6 letter c) GDPR (in particular, by EU Directive 2019/1937 implemented, in Italian law, by Legislative Decree 24/2023)
- legitimate interest of the Data Controller, pursuant to Article 6 letter f) GDPR
- ascertain, exercise or defend a right in court, pursuant to art. 9 lit. f) GDPR

It should also be noted that, in the cases prescribed by art. Article 12, paragraphs 2) and 5) of Legislative Decree 24/2023, the data will be processed subject to the acquisition of the consent of the interested party.

### **Preservation**

We would like to point out that, in compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 EU Regulation 2016/679, the retention period of your personal data is established in a period not exceeding the achievement of the purposes for which they are collected and processed and in compliance with the times prescribed by law. In particular, the data will be processed up to a maximum of 5 years, starting from the date of communication of the final outcome of the reporting procedure. It should be noted that the data may be stored for further time, in particular until the conclusion of the judicial or disciplinary proceedings in the event that, following the report, proceedings are initiated.

### **Methods of data processing**

The processing will be carried out in automated and/or manual form, with methods and tools, in compliance with the security measures referred to in art. 32 of the GDPR, by persons specifically appointed. Security



measures will be used to guarantee the confidentiality of the data subject to whom such data refer and to avoid undue access to third parties or unauthorized personnel. The whistleblower can view the methods of transmission and management of the report through the internal channels activated by the company and illustrated within the specific procedure adopted by the Data Controller.

#### **Scope of communication and dissemination**

The personal data provided may be communicated to:

- Suppliers duly appointed as Data Processors pursuant to art. 28 GDPR (in particular, Alfa Solutions S.p.A. with registered office in Viale B. Ramazzini 39/D, Reggio Emilia (RE) and operational headquarters in Strada Traversetolo 20/D, 43123 Parma (PR), for all activities related to the management of reports made pursuant to Legislative Decree 24/2023)
- Any public bodies to which the data must be communicated by law (ANAC, Judicial Authority)

#### **Transfer of data to third countries**

The processed personal data will not be transferred outside the EU.

#### **Data Controller**

The Data Controller is MAX STREICHER S.p.A., in the person of its legal representative. The registered office of the Data Controller is located in Via G. Keplero 5/A - 43122 Parma (PR). You can contact the Data Controller at [privacy@streicher.it](mailto:privacy@streicher.it)

#### **Rights of the data subject**

At any time, you may exercise the rights referred to in art. 15-22 of EU Regulation 2016/679.

If you consider that the processing of your data violates the GDPR Regulation EU-2016/679, you have the right to lodge a complaint with the Garante per la protezione dei dati personali. Data available at [www.garanteprivacy.it](http://www.garanteprivacy.it).