

## PRIVACY POLICY

*(Articles 13 and 14 of EU Regulation 2016/679 and Legislative Decree 196/2003 and subsequent amendments)*

Dear concerned party,

below we provide you with some information that is necessary to bring to your attention, not only to comply with legal obligations but also because transparency and fairness towards data subjects are fundamental aspects of our activity.

### **Titolare del trattamento**

Data Controller The Data Controller of your personal data is **Maglificio Ferdinanda di Fiorin & Tomasin S.r.l.**, responsible for the legitimate and correct use of your personal data and whom you may contact for any information or requests using the following contact details:

VAT number	01115160267
Address	Via Casere 9, 31028 Vazzola (TV)
Phone	+39 0438 441474
E-mail	maglificio@maglificioferdinanda.com
PEC	maglificioferdinanda@ecpec.it

**N.B.** The aforementioned contact details are not to be used for forwarding whistleblowing reports. For further details regarding the correct internal and external communication channels, the prerequisites for making reports, and the procedure for their management, please refer to the documentation available in the dedicated section of the Data Controller's website.

### **Categories of processed data and data source**

The receipt and management of reports as per the procedure adopted by the Data Controller result in the processing of so-called "common" personal data (personal information, contact details, address data, data relating to work activity, etc.), as well as may give rise, depending on the information spontaneously inserted in the report and in the acts and documents voluntarily attached thereto, to the processing of so-called "special" personal data (data relating to health conditions, union membership, etc., referred to in Article 9 GDPR) and personal data relating to criminal convictions and offenses (referred to in Article 10 GDPR).

The processed data may concern the reporting individual, the so-called whistleblower, the person or persons identified as possible responsible parties for the reported conduct, any other individuals named in the report or in the attached acts and documents, as well as anyone involved in any capacity in the reported procedure and events.

Personal data that is manifestly not useful for the processing of a specific report is not collected, or if collected accidentally, is immediately deleted.

The processed data is communicated by the reporting individual and may also be acquired autonomously by the Data Controller during any investigative activities that may become necessary, including consulting authorities and public entities and/or publicly accessible sources.

## Processing

Your personal data is collected and processed, using automated, semi-automated, and non-automated methods, as specified below:

Processing	Purpose	Legal basis	Data retention*
Whistleblowing	Managing the whistleblowing reporting procedure as well as all activities useful for receiving reports and their subsequent management, such as providing feedback to reporters regarding their receipt, carrying out any necessary investigative activities, and taking appropriate measures	Compliance with a legal obligation to which the Data Controller is subject Any "special" data is processed to fulfill obligations and exercise specific rights of the Controller or the Data Subject in labor law Matters Any personal data relating to criminal convictions and offenses is processed to fulfill obligations and exercise rights by the controller or the data subject in labor law or in the context of employment relationships, within the limits established by laws, regulations, and collective agreements	For the time strictly necessary for the achievement of the purpose and in any case not beyond 5 years from the date of communication of the final outcome of the reporting procedure

\* In addition to the time necessary for the expiration of the prescription terms concerning mutual rights and the time for the retention of backups.

## Data provision

The provision of personal data and other information necessary for the identification of the reporter is mandatory to make a report under the Whistleblowing regulations (Legislative Decree 24/2023), while the provision of data other than the above is optional. In case of non-provision of mandatory data, the report will be considered anonymous and will be treated as indicated in the documentation available in the dedicated section of the Data Controller's website.

## Recipients of the data

Personal data may only be disclosed to subjects processing data on behalf of the Data Controller, appointed as data Processors pursuant to Article 28 of EU Regulation No. 2016/679, including the manager of whistleblowing reports.

Personal data may also be disclosed, in addition to the above-mentioned subjects, to Authorities and public bodies (e.g., the Judicial Authority, the National Anti-Corruption Authority - ANAC).

**N.B.** It is specified that the identity of the reporting person and any other information from which the identity can be directly or indirectly inferred cannot be disclosed without the express consent of the reporting person to subjects or categories of subjects not mentioned above. In any case, the reporter is notified of the reasons for the disclosure of confidential data. In the context of any criminal proceedings, the methods and limits provided for in Article 329 of the Code of Criminal Procedure apply. Within the framework of disciplinary proceedings, the identity of the reporting person may be disclosed, with their consent, only if the allegation is based, in whole or in part, on the report and the knowledge of the identity of the reporting person is indispensable for the defense of the accused.

### **Automated Decision-Making Process**

The Data Controller does not carry out automated decision-making processes for the processing in question.

### **Data transfer outside the EU**

There are no planned transfers of data outside the European Economic Area. However, in the event that such transfers are deemed strictly necessary, any transfers will be conducted in accordance with the conditions provided for in Articles 44 and following of the GDPR.

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

You are guaranteed the exercise of the rights recognized by Articles 15 and following of the GDPR.

In particular, you are guaranteed, according to the methods and within the limits provided by current legislation (see what is provided for in whistleblowing matters by Article 2-undecies, paragraph 1, letter f) of Legislative Decree 196/2003 as recently amended by Legislative Decree 24/2023, with effect from July 15, 2023), the exercise of the following rights:

- to request from the Data Controller access to your personal data, as well as their rectification and erasure or oblivion;
- to request data portability or the restriction of processing;
- for reasons related to your particular situation, to object to the processing based on the legitimate interest of personal data concerning you;
- for processing based on consent, to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- to view the essential contents of any joint controller agreements that may have been signed;
- to lodge a complaint with the Garante per la protezione dei dati personali (Italian Data Protection Authority), located at Piazza Venezia 11, 00187 - Rome - protocollo@pec.gdpr.it.

To exercise your rights or to request additional information, you may contact the Data Controller using the above contact information.

### **Changes to this privacy policy**

The Data Controller reserves the right to update this Privacy Policy. Any changes will be communicated in the manner deemed most appropriate, and we will update the date in this Privacy Policy accordingly. Therefore, we recommend periodic consultation of our Privacy Policy, also by requesting a copy from the Data Controller.

Last updated 06/03/2024