

INFORMATION PURSUANT TO ART. 13 OF THE GDPR

Whistleblowing

December 2024 edition

This information notice describes the processing carried out through the channel for reporting violations of laws and irregularities introduced by Article 2(1) of Law 179/2017 (known as 'whistleblowing') and regulated, among others, by Legislative Decree 24/2023.

1. Data controller

1.1. Pietro Fiorentini S.p.A., with registered office in Via Enrico Fermi 8/10 – 36057, Arcugnano (VI), VAT number 08620190150. Contact details: a) e-mail: inof@fiorentini.com; b) telephone: 0444/968511.

2. Purpose and legal basis of the processing, nature of the provision

2.1. The processing will be carried out for the management of the whistleblowing procedure in accordance with current legislation, to verify the validity of the reported fact, to take the necessary measures, to protect a right in court and to respond to any request from the judicial authorities.

2.2. The legal basis for the processing lies, with regard to the report you have made, in the legitimate interest of the data controller and in the fulfilment of legal obligations.

2.3. The provision of data is necessary for the management of the whistleblowing procedure and for all subsequent obligations.

3. Recipients of personal data

3.1. Personal data may only be made accessible to persons who have a role in the management of the whistleblowing procedure (specifically identified internal persons, the Supervisory Body and persons specifically identified by the latter, internal staff or external consultants who may be involved in the management of the report). These persons are bound by a duty of confidentiality and specific instructions.

3.2. Service providers for the management of the report may have access to personal data for strictly technical purposes related to the platform, acting as data processors on the basis of specific instructions provided by the data controller.

3.3. The judicial authorities, public authorities, ANAC and, in general, all parties to whom the communication must be made by law may also have access to the data and information collected.

3.4. Personal data will not be disclosed to parties other than those identified above, nor will it be disseminated.

3.5. The data will not be transferred to countries outside the EU.

4. Retention period

4.1. Personal data may be retained for a period of time limited to the achievement of the purposes for which it is collected.

4.2. Reports and related documentation are retained for the time necessary and in any case for no longer than five years from the date of communication of the final outcome of the reporting procedure.

4.3. This is without prejudice to any further retention period required by law or necessary for the protection of a right.

5. Rights of data subjects

5.1. You may exercise your rights under Articles 15 to 22 of the GDPR by contacting the data controller at one of the contact points indicated in this policy.

5.2. You may exercise your right to lodge a complaint under Article 77 of the GDPR.

5.3. In accordance with Article 2-undecies of Legislative Decree 196/2003, these rights may not be exercised by data subjects if the exercise of such rights could result in actual and concrete prejudice to the confidentiality of the identity of the person reporting violations of which they have become aware by virtue of their employment relationship or the functions performed, or who reports violations pursuant to Articles 52-bis, 52-ter of Legislative Decree 385/1993 or Articles 4-undecies and 4-duodecies of Legislative Decree 58/1998. In particular, the exercise of these rights must comply with the provisions of the law or regulations governing the sector; it may be delayed, limited or excluded by means of a reasoned communication made without delay to the data subject, unless the communication could compromise the purpose of the limitation, for the time and to the extent that this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the data subject. In this case, the rights of the data subject may also be exercised through the Data Protection Authority in the manner provided for in Article 160 of Legislative Decree 196/2003.

6. Further information

6.1. The data controller remains available for any clarification. For all matters relating to the processing of personal data and the exercise of rights, please contact the following points of contact: a) e-mail: privacy@fiorentini.com.