







**INFORMATIVA RELATIVA AL TRATTAMENTO DEI DATI PERSONALI  
AI SENSI DELL'ART. 13 DEL REGOLAMENTO (UE) 2016/679 ("GDPR")  
PORTALE PER SEGNALAZIONI di WHISTELBLOWING**


**Elica S.p.A.**, in qualità di titolare del trattamento, ai sensi dell'art. 13 del GDPR, intende fornire ai propri dipendenti, partner, clienti, fornitori, consulenti, collaboratori e, più in generale, a chiunque sia in relazione d'interessi con la Elica S.p.A. (l'"Interessato" o collettivamente gli "Interessati") le specifiche informative sul trattamento dei dati personali che si rendono necessarie con riferimento alle segnalazioni trasmesse tramite il Portale Whistleblowing (di seguito "Portale") raggiungibile mediante link rinvenibili sul sito web del Titolare, ai sensi dell'art. 13 del Regolamento (UE) 2016/679 del Parlamento europeo e del Consiglio del 27 aprile 2016 ("GDPR") e della normativa europea e nazionale che lo integra e/o lo modifica ("Normativa Privacy Applicabile"), ivi compresa la disciplina sulla protezione dei dati personali di cui al Decreto Legislativo n. 196/2003, come modificato dal Decreto Legislativo n. 101/2018 (di seguito, "Codice Privacy").


	<b>TITOLARE DEL TRATTAMENTO</b>	<b>Elica S.p.A.</b> Via Ermanno Casoli, n.2, 60044 Fabriano (AN) Indirizzo pec: <a href="mailto:elicaspa@sicurezzapostale.it">elicaspa@sicurezzapostale.it</a> Telefono: +39-07326101 ("Società" o "Titolare")
	<b>RESPONSABILE DELLA PROTEZIONE DATI (DPO)</b>	Il DPO è contattabile all'indirizzo e-mail: <a href="mailto:dpo@elica.com">dpo@elica.com</a>

	<p style="text-align: center;"><b>DATI TRATTATI</b></p> <p>Il Titolare tratterà i dati forniti dal segnalante al fine di rappresentare le presunte condotte illecite, delle quali sia venuto a conoscenza, commesse dai soggetti che a vario titolo interagiscono con la Società, allo scopo di effettuare le necessarie attività istruttorie volte a verificare la fondatezza del fatto oggetto di segnalazione e l'adozione dei conseguenti provvedimenti. I dati raccolti e trattati comprendono i dati anagrafici e i dati di contatto nell'ipotesi in cui il segnalante decida di non rimanere anonimo ed accedere al Portale in forma "nominativa", dati relativi al rapporto di lavoro, la funzione svolta, ovvero gli elementi caratterizzanti la segnalazione (di seguito: "<b>Dati Comuni</b>"). Il Titolare tratterà dati appartenenti a categorie particolari, vale a dire i dati idonei a rivelare, tra l'altro, l'origine razziale ed etnica, i dati relativi allo stato di salute e alla vita sessuale (i "<b>Dati Particolari</b>") solamente qualora Lei decidesse liberamente di fornirli quali elementi caratterizzanti della segnalazione. I <b>Dati Comuni</b> e i <b>Dati Particolari</b>, di seguito, congiuntamente, sono definiti "<b>Dati Personali</b>". I Dati Personali sono da Lei direttamente forniti tramite la compilazione degli appositi campi al momento dell'invio della segnalazione o, in seguito, se decidesse di inserire ulteriori elementi per circostanziare la segnalazione tramite il sistema di messaggistica (chat) del Portale che permette di instaurare un colloquio virtuale con l'organo deputato alla gestione della segnalazione.</p>
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 FINALITÀ DEL TRATTAMENTO	 BASE GIURIDICA DEL TRATTAMENTO	 PERIODO DI CONSERVAZIONE DEI DATI
<p>1) la corretta e completa gestione del procedimento di Whistleblowing in conformità alla vigente normativa in materia;</p> <p>2) le necessarie attività istruttorie volte a verificare la fondatezza del fatto oggetto di segnalazione e l'adozione dei conseguenti provvedimenti.</p> <p>I dati personali da Lei forniti saranno trattati per segnalare, nell'interesse dell'integrità della Società, presunte condotte illecite delle quali sia venuto a conoscenza in ragione del proprio rapporto</p>	<p>Ai sensi dell'art. 6, comma 1 lettera c) del Regolamento Europeo n. 679/2016, tutti i dati personali raccolti nell'ambito del presente trattamento sono strettamente funzionali e necessari per il perseguimento di quanto previsto dal D. Lgs. n. 24/2023.</p>	<p>In particolare i dati personali raccolti sono conservati per un periodo non superiore a cinque anni, decorrenti dalla data di ricezione della Segnalazione, nonché per tutto il periodo necessario allo svolgimento degli eventuali procedimenti scaturenti dalla gestione della segnalazione (disciplinare, penale, contabile). È fatta salva la conservazione per un periodo superiore in relazione a richieste della pubblica autorità pubbliche e dell'Autorità Garante per la protezione dei dati personali. È fatta salva la conservazione dei dati personali, anche particolari, per un periodo superiore, nei limiti del termine di prescrizione dei diritti, in relazione ad esigenze connesse all'esercizio del diritto di difesa in caso di controversie.</p>

<p>di lavoro, servizio, fornitura, o di collaborazione con la Società, verranno trattati dalla Società stessa per gestire tali situazioni. I dati personali sono dunque acquisiti in quanto contenuti nella segnalazione e/o in atti e documenti a questa allegati, si riferiscono al soggetto segnalante e possono altresì riferirsi a persone indicate come possibili responsabili delle condotte illecite, nonché a quelle a vario titolo coinvolte nelle vicende segnalate. In particolare, per svolgere le necessarie attività istruttorie volte a verificare la fondatezza di quanto segnalato, nonché, se del caso, adottare adeguate misure correttive e intraprendere le opportune azioni disciplinari e/o giudiziarie nei confronti dei responsabili delle condotte illecite</p>		
<p>Se necessario, per accertare, esercitare o difendere i diritti della Società in sede giudiziaria.</p>	<p>La base giuridica del trattamento è ravvisabile nel legittimo interesse della Società, ai sensi dell'art. 6.1 lett. f) del GDPR.</p>	<p>I Dati saranno trattati per la durata dell'eventuale contenzioso, fino all'esaurimento dei termini di esperibilità delle azioni di impugnazione.</p>
<p>Decorsi i termini di conservazione sopra indicati, i Dati saranno distrutti o resi anonimi, compatibilmente con i termini prescritti dalle procedure adottate dalla Società.</p>		

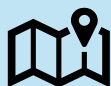
	<p><b>CONFERIMENTO DEI DATI</b></p> <p>Il conferimento dei Dati Personali identificativi del segnalante è puramente facoltativo, pertanto, il loro mancato, parziale o inesatto conferimento non preclude l'avvio della necessaria istruttoria da parte della Società. Nel caso in cui il segnalante volesse, pertanto, procedere con segnalazione anonima, quest'ultima verrà presa in considerazione esclusivamente laddove adeguatamente circostanziata, resa con dovizia di particolari e dunque in grado di far emergere fatti e situazioni relazionandoli a contesti determinati. E' rimessa invece a ciascun segnalante la decisione circa quali ulteriori dati personali da conferire.</p>
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	<p><b>DESTINATARI DEI DATI</b></p> <p>La comunicazione dei dati personali raccolti avviene principalmente nei confronti di terzi e/o destinatari la cui attività è necessaria per l'espletamento delle attività inerenti la gestione della segnalazione, nonché per rispondere a determinati obblighi di legge. In particolare la trasmissione potrà avvenire nei confronti di: a) responsabili Whistleblowing individuato dal Titolare; b) società incaricata per la gestione del Portale, nella sua qualità di Responsabile Esterno ai sensi e per gli effetti di cui all'art. 28 GDPR; c) consulenti esterni (per es. studi legali) eventualmente coinvolti nella fase istruttoria della segnalazione; d) funzioni aziendali coinvolte nell'attività di ricezione, esame e valutazione delle segnalazioni; e) responsabile/i della/e funzione/i interessata/e dalla segnalazione; f) posizioni organizzative incaricate di svolgere accertamenti sulla segnalazione nei casi in cui la loro conoscenza sia indispensabile per la comprensione dei fatti segnalati e/o per la conduzione delle relative attività di istruzione e/o trattazione; g) istituzioni e/o Autorità Pubbliche, Autorità Giudiziaria, Organi di Polizia, Agenzie investigative; h) organismo di vigilanza. I tuoi dati personali non saranno in alcun modo diffusi o divulgati verso soggetti diversi da quelli sopra individuati</p>
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### SOGGETTI AUTORIZZATI AL TRATTAMENTO

I Dati Personali potranno essere trattati dai dipendenti appartenenti alle funzioni aziendali deputate al perseguimento delle finalità sopra indicate, che sono stati espressamente autorizzati al trattamento e che hanno ricevuto adeguate istruzioni operative.



### TRASFERIMENTO DEI DATI PERSONALI IN PAESI NON APPARTENENTI ALL'UNIONE EUROPEA

Il Titolare non trasferisce i tuoi dati personali al di fuori dello Spazio Economico Europeo.



### DIRITTI DELL'INTERESSATO - RECLAMO ALL'AUTORITÀ DI CONTROLLO

L'interessato può esercitare nei confronti del Titolare i diritti riconosciuti dagli artt. 15-22 del GDPR e, in particolare, può chiedere l'accesso ai Dati che lo riguardano, la loro cancellazione, la rettifica dei Dati inesatti, l'integrazione dei Dati incompleti, la limitazione del trattamento nei casi previsti dall'art. 18 GDPR<sup>1</sup>.

L'interessato, inoltre, nel caso in cui il trattamento sia basato sul consenso o sul contratto e sia effettuato con strumenti automatizzati ha il diritto di ricevere in un formato strutturato, di uso comune e leggibile da dispositivo automatico i Dati, nonché, se tecnicamente fattibile, di trasmetterli ad altro titolare senza impedimenti.

L'interessato ha il diritto di revocare il consenso prestato in qualsiasi momento richiedendola cancellazione dall'iscrizione al servizio di newsletter cliccando sull'apposito link di *unsubscribe* in calce ad ogni e-mail.

L'interessato ha il diritto di opporsi in ogni momento, in maniera agevole e gratuitamente, per motivi connessi alla situazione particolare, al trattamento dei dati nelle ipotesi di legittimo interesse del Titolare.

Tali diritti possono essere esercitati scrivendo al Titolare tramite l'invio di un'e-mail al seguente indirizzo [privacy@elica.com](mailto:privacy@elica.com).

Quando gli interessati intendono esercitare i propri diritti, la Società potrebbe chiedere di identificarsi prima di procedere con l'evasione della richiesta.

L'interessato potrà proporre reclamo all'Autorità di controllo competente (art. 77 GDPR), nonché adire le opportune sedi giudiziarie (art. 79 GDPR).

<sup>1</sup> Ai sensi dell'art. 18 del GDPR, l'interessato ha il diritto di ottenere dal titolare del trattamento la limitazione del trattamento quando ricorre una delle seguenti ipotesi:



- l'interessato contesta l'esattezza dei dati personali, per il periodo necessario al titolare del trattamento per verificare l'esattezza di tali dati personali;
- il trattamento è illecito e l'interessato si oppone alla cancellazione dei dati personali e chiede invece che ne sia limitato l'utilizzo;
- benché il titolare del trattamento non ne abbia più bisogno ai fini del trattamento, i dati personali sono necessari all'interessato per l'accertamento, l'esercizio o la difesa di un diritto in sede giudiziaria;
- l'interessato si è opposto al trattamento ai sensi dell'articolo 21, paragrafo 1, in attesa della verifica in merito all'eventuale prevalenza dei motivi legittimi del titolare del trattamento rispetto a quelli dell'interessato.


Se il trattamento è limitato a norma del paragrafo 1, tali dati personali sono trattati, salvo che per la conservazione, soltanto con il consenso dell'interessato o per l'accertamento, l'esercizio o la difesa di un diritto in sede giudiziaria oppure per tutelare i diritti di un'altra persona fisica o giuridica o per motivi di interesse pubblico rilevante dell'Unione o di uno Stato membro.




L'interessato che ha ottenuto la limitazione del trattamento a norma del paragrafo 1 è informato dal titolare del trattamento prima che detta limitazione sia revocata.

**INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF (EU)  
REGULATION 2016/679 ("GDPR")  
WHISTELBLOWING PORTAL**


**Elica S.p.A.**, as Data Controller, pursuant to article 13 of the GDPR, intends to provide its staff, partners, clients, suppliers, consultants, collaborators and , more in general, anyone who has undertaken relations with Elica S.p.A. ("Data Subject " or collectively "Data Subjects ") with specific information on the processing of personal data deemed necessary when reporting on the Whistleblowing Portal (hereinafter referred to as "Portal"), which is accessible via links on Data Controller's website, in accordance with article 13 of the Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 ("GDPR") , as well as European and national legislation supplementing and/or amending it ("Applicable Privacy Legislation"), including the rules on the protection of personal data set out in Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018 (hereinafter referred to as "Privacy Code").

	<b>DATA CONTROLLER</b>	<p><b>Elica S.p.A.</b> Via Ermanno Casoli, n.2, 60044 Fabriano (AN) Pec: <a href="mailto:elicaspas@sicurezza postale.it">elicaspas@sicurezza postale.it</a> Telephone: +39-07326101 (hereinafter referred to as "Company" or "Data Controller")</p>
	<b>DATA PROTECTION OFFICER (DPO)</b>	<p>DPO can be contacted at: <a href="mailto:dpo@elica.com">dpo@elica.com</a></p>

	<p style="text-align: center;"><b>PERSONAL DATA PROCESSED</b></p> <p>Data Controller shall process the data provided by the reporting party to represent the alleged unlawful conduct, of which it has become aware, committed by persons who in different manners interact with the Company, in order to carry out all necessary investigative activities aimed at verifying the existence of the fact being reported and the adoption of any consequent measures. Data collected and processed include personal data and contact details should the reporting party decide not to remain anonymous and to access the Portal on a "nominative" basis, data relating to the employment relationship, the organization's role covered, as well as any relevant element in aforementioned report (hereinafter referred to as "<b>Common Data</b>"). Data Controller shall process data belonging to special categories, i.e. data revealing, inter alia, racial and ethnic origin, data concerning health and sex life hereinafter referred to as "<b>Specific Data</b>", only in the case you freely choose to provide it as the characterizing elements of your report. Common Data and Specific Data are hereinafter jointly referred to as "<b>Personal Data</b>". Personal Data can be provided directly by filling in the appropriate fields when sending the report or thereupon, should you decide to add further details in your report, via the Portal's messaging system (chat), which allows you to establish a virtual interview with the body in charge of the report management.</p>
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 <b>PURPOSES OF DATA PROCESSING</b>	 <b>LEGAL BASIS OF DATA PROCESSING</b>	 <b>DATA RETENTION PERIOD</b>
<p>1) correct and complete management of the Whistleblowing procedure in compliance with the relevant legislation in force; 2) required investigation activities aimed at verifying the existence of the fact being reported and the adoption of any consequent measures. Personal Data provided by you in reporting the alleged unlawful conduct for the</p>	<p>Pursuant to Article 6(1)(c) of the European Regulation No. 679/2016, all personal data collected within the scope of this processing are strictly functional and necessary for the pursuit of the provisions of Legislative Decree No. 24/2023.</p>	<p>In particular, personal data collected is retained for a period not exceeding five years, starting from the Report receipt date and for all the time necessary to carry out any proceedings arising from the Report management activity (disciplinary, criminal, accounting ones). The foregoing is without prejudice to the retention of personal data over a longer period in relation to any requests made by public authorities and Data Protection Authorities. Similarly, this retention of personal data, including specific data over an extended period within the limitations prescribed by rights, pursuant to the right</p>

<p>integrity of the Company - and as a result of your employment, service to, supply of, or collaboration in relationship with the Company - shall be processed by the Company itself holding the capacity to manage the aforementioned situations.</p> <p>Personal Data shall therefore be acquired automatically from the report and/or in deeds and documents annexed thereto, and shall refer to the reporting party as well as to persons indicated as allegedly responsible for the unlawful conduct, and to those who in various capacities were allegedly involved in the events reported. In particular, in order to carry out the necessary investigation activities aimed at verifying the existence of what has been reported, and take necessary corrective measures and appropriate disciplinary and/or judicial action against those responsible for the unlawful conduct.</p>		<p>of defense connected to any eventual disputes.</p>
<p>If necessary, to ascertain, exercise or defend the Company's rights in court.</p>	<p>The legal basis for data processing is the legitimate interest of the Company, pursuant to Article 6.1(f) of the GDPR.</p>	<p>Personal Data shall be processed for the entire duration of any litigation, until the deadline for appeal has expired</p>
<p>After the expiry of the aforementioned retention periods, Personal Data shall be destroyed or rendered anonymous, according to the terms prescribed by the procedures adopted by the Company.</p>		

	<p><b>PROVISION OF DATA</b></p> <p>Provision of the reporting party's Personal Data is purely optional; therefore, failure to provide such data, whether in part or inexactly, does not prevent the Company from initiating the necessary preliminary investigation. Should the reporter intend to proceed with an anonymous report, then it shall only be taken into consideration if it is circumstantial and provided with great detail and therefore capable of providing and bringing facts and situations that can be connected to their specific contexts. On the other hand, it is left to each reporting party to decide which further Personal Data to provide.</p>
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	<p><b>DATA RECIPIENTS</b></p> <p>Personal Data collected shall be communicated mainly to third parties and/or recipients whose activity is necessary for the performance of report management activities, as well as</p>
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to comply with certain legal obligations. In particular, Personal Data may be transmitted to:

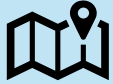
- a) Whistleblowing managers identified by Data Controller;
- b) the company appointed to manage the Portal, in its capacity as External Manager pursuant to and for the purposes of Article 28 GDPR;
- c) external consultants (e.g. law firms) that may be involved in the report preliminary investigation phase;
- d) company functions involved in report acceptances, examination and evaluation activities;
- e) person(s) in charge of the function(s) concerned by the report;
- f) corporate positions in charge of investigating the report in those cases where their knowledge is indispensable for understanding the facts reported and/or for conducting the relevant investigation and/or processing activities;
- g) institutions and/or Public Authorities, Judicial Authorities, Police Bodies, Investigative Agencies;
- h) supervisory body.

Your Personal Data shall in no way be disseminated or disclosed to parties other than the aforementioned ones .



#### **SUBJECTS AUTHORIZED IN DATA PROCESSING**

Data may be processed by employees belonging to corporate departments in charge of the collection of data for the aforementioned purposes, who have been expressly authorised to do so and who have received adequate operating instructions.



#### **TRANSFER OF PERSONAL DATA TO EXTRA- EUROPEAN UNION COUNTRIES**

Data Controller shall not transfer your Personal Data outside the European Economic Area.



#### **RIGHTS OF THE DATA SUBJECT - COMPLAINT TO THE SUPERVISORY AUTHORITY**

The data subject may exercise the rights in Articles 15-22 of GDPR towards the data Controller and, in particular, may request access to their own Data, as well as cancellation, amendment of inaccurate Data, integration of incomplete Data, limitation of data processing in the cases provided for by Article 18 GDPR<sup>2</sup>, where applicable.

Furthermore, should data processing be based on a consent or contract and performed by automated tools, the data subject has the right to receive the Data in a structured, commonly used and machine-readable format, and, if technically possible, to transmit it to another controller without any hindrance. The data subject is entitled to revoke their consent at any time by requesting unsubscription from the newsletter service by clicking on the unsubscribe link at the bottom of each email.

The data subject is entitled to oppose to the processing of their Data at any time, in a simple manner and free of charge, for reasons concerning a specific situation in the case of legitimate interest of the Data Controller

Such rights may be exercised by sending an email to the Data Controller at: [privacy@elica.com](mailto:privacy@elica.com)

Should data subjects intend to exercise their rights, then the Company may ask them to identify before handling their request..

<sup>2</sup> Pursuant to Article 18 of the GDPR, the data subject is entitled to obtain a limitation of data processing from the data controller, in one of the following cases:

- (a) the data subject disputes the accuracy of personal data, for the period necessary to the controller to verify accuracy of such personal data;
- (b) data processing is unlawful and the data subject opposes the cancellation of personal data and instead requests to limit the use of the same;
- (c) although the data controller no longer needs the personal data for processing purposes, such personal data is necessary to the data subject to ascertain, exercise or defend one of their rights in a Court of Law;
- (d) the data subject opposed to data processing pursuant to Article 21(1), pending the verification as to whether the legitimate grounds of the data controller prevail over those of the data subject.

Should data processing be limited as pursuant to paragraph 1, such personal data shall, except for storage, only be processed with the consent of the data subject or to ascertain, exercise or defend one of their rights in a Court of Law or to protect the rights of another natural or legal person or for reasons of substantial public interest of the European Union or of a Member State.



A data subject who obtained a limitation in data processing pursuant to paragraph 1, shall be informed by the data controller before such limitation is canceled.







The data subject may lodge a complaint with the competent supervisory authority (Art. 77 GDPR) and take legal action (Art. 79 GDPR), as well.

**INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF (EU) REGULATION 2016/679 ("GDPR") WHISTELBLOWING PORTAL**


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	<b>DATA CONTROLLER</b>	<b>Elica France SASU</b> , 11, rue Louis Philippe– 92200 Neuilly sur Seine - Paris contactfrance@elica.com Tél. +330185533060. (ci-après « Société » ou » <b>Responsable du traitement des données</b> »)
	<b>DATA PROTECTION OFFICER (DPO)</b>	Vous pouvez contacter le Délégué à la protection des données (DPO) à l'adresse électronique : dpo_elicafrance@elica.com

	<p><b>PERSONAL DATA PROCESSED</b></p> <p>Data Controller shall process the data provided by the reporting party to represent the alleged unlawful conduct, of which it has become aware, committed by persons who in different manners interact with the Company, in order to carry out all necessary investigative activities aimed at verifying the existence of the fact being reported and the adoption of any consequent measures. Data collected and processed include personal data and contact details should the reporting party decide not to remain anonymous and to access the Portal on a "nominative" basis, data relating to the employment relationship, the organization's role covered, as well as any relevant element in aforementioned report (hereinafter referred to as "<b>Common Data</b>"). Data Controller shall process data belonging to special categories, i.e. data revealing, inter alia, racial and ethnic origin, data concerning health and sex life hereinafter referred to as "<b>Specific Data</b>"), only in the case you freely choose to provide it as the characterizing elements of your report. Common Data and Specific Data are hereinafter jointly referred to as "<b>Personal Data</b>". Personal Data can be provided directly by filling in the appropriate fields when sending the report or thereupon, should you decide to add further details in your report, via the Portal's messaging system (chat), which allows you to establish a virtual interview with the body in charge of the report management.</p>
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<p>adoption of any consequent measures.</p> <p>Personal Data provided by you in reporting the alleged unlawful conduct for the integrity of the Company - and as a result of your employment, service to, supply of, or collaboration in relationship with the Company - shall be processed by the Company itself holding the capacity to manage the aforementioned situations.</p> <p>Personal Data shall therefore be acquired automatically from the report and/or in deeds and documents annexed thereto, and shall refer to the reporting party as well as to persons indicated as allegedly responsible for the unlawful conduct, and to those who in various capacities were allegedly involved in the events reported. In particular, in order to carry out the necessary investigation activities aimed at verifying the existence of what has been reported, and take necessary corrective measures and appropriate disciplinary and/or judicial action against those responsible for the unlawful conduct.</p>		<p>personal data, including specific data over an extended period within the limitations prescribed by rights, pursuant to the right of defense connected to any eventual disputes.</p>
<p>If necessary, to ascertain, exercise or defend the Company's rights in court.</p>	<p>The legal basis for data processing is the legitimate interest of the Company, pursuant to Article 6.1(f) of the GDPR.</p>	<p>Personal Data shall be processed for the entire duration of any litigation, until the deadline for appeal has expired</p>
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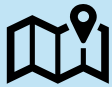
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- d) company functions involved in report acceptances, examination and evaluation activities;
- e) person(s) in charge of the function(s) concerned by the report;
- f) corporate positions in charge of investigating the report in those cases where their knowledge is indispensable for understanding the facts reported and/or for conducting the relevant investigation and/or processing activities;
- g) institutions and/or Public Authorities, Judicial Authorities, Police Bodies, Investigative Agencies;
- h) supervisory body.

Your Personal Data shall in no way be disseminated or disclosed to parties other than the aforementioned ones .



#### **SUBJECTS AUTHORIZED IN DATA PROCESSING**

Data may be processed by employees belonging to corporate departments in charge of the collection of data for the aforementioned purposes, who have been expressly authorised to do so and who have received adequate operating instructions.



#### **TRANSFER OF PERSONAL DATA TO EXTRA- EUROPEAN UNION COUNTRIES**

Data Controller shall not transfer your Personal Data outside the European Economic Area.

#### **RIGHTS OF THE DATA SUBJECT - COMPLAINT TO THE SUPERVISORY AUTHORITY**

The data subject may exercise the rights in Articles 15-22 of GDPR towards the data Controller and, in particular, may request access to their own Data, as well as cancellation, amendment of inaccurate Data, integration of incomplete Data, limitation of data processing in the cases provided for by Article 18 GDPR<sup>3</sup>, where applicable.

<sup>3</sup> Pursuant to Article 18 of the GDPR, the data subject is entitled to obtain a limitation of data processing from the data controller, in one of the following cases:

- (a) the data subject disputes the accuracy of personal data, for the period necessary to the controller to verify accuracy of such personal data;
- (b) data processing is unlawful and the data subject opposes the cancellation of personal data and instead requests to limit the use of the same;
- (c) although the data controller no longer needs the personal data for processing purposes, such personal data is necessary to the data subject to ascertain, exercise or defend one of their rights in a Court of Law;
- (d) the data subject opposed to data processing pursuant to Article 21(1), pending the verification as to whether the legitimate grounds of the data controller prevail over those of the data subject.

Should data processing be limited as pursuant to paragraph 1, such personal data shall, except for storage, only be processed with the consent of the data subject or to ascertain, exercise or defend one of their rights in a Court of Law or to protect the rights of another natural or legal person or for reasons of substantial public interest of the European Union or of a Member State.

A data subject who obtained a limitation in data processing pursuant to paragraph 1, shall be informed by the data controller before such limitation is canceled.



Furthermore, should data processing be based on a consent or contract and performed by automated tools, the data subject has the right to receive the Data in a structured, commonly used and machine-readable format, and, if technically possible, to transmit it to another controller without any hindrance. The data subject is entitled to revoke their consent at any time by requesting unsubscription from the newsletter service by clicking on the unsubscribe link at the bottom of each email.

The data subject is entitled to oppose to the processing of their Data at any time, in a simple manner and free of charge, for reasons concerning a specific situation in the case of legitimate interest of the Data Controller.

Such rights may be exercised by sending an email to the Data Controller at: [privacyfrance@elica.com](mailto:privacyfrance@elica.com). Should data subjects intend to exercise their rights, then the Company may ask them to identify before handling their request.

The data subject may lodge a complaint with the competent supervisory authority (Art. 77 GDPR) and take legal action (Art. 79 GDPR), as well.

**INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF (EU) REGULATION 2016/679 (“GDPR”) WHISTELBLOWING PORTAL**


**Elica Group Polska Sp z o.o.**, as Data Controller, pursuant to article 13 of the GDPR, intends to provide its staff, partners, clients, suppliers, consultants, collaborators and , more in general, anyone who has undertaken relations with Elica Group Polska Sp z o.o. ("Data Subject " or collectively "Data Subjects ") with specific information on the processing of personal data deemed necessary when reporting on the Whistleblowing Portal (hereinafter referred to as "Portal"), which is accessible via links on Data Controller’s website, in accordance with article 13 of the Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 ("GDPR") , as well as European and national legislation supplementing and/or amending it ("Applicable Privacy Legislation").


	<b>DATA CONTROLLER</b>	<b>(Elica Group Polska Sp. z o. o.</b> Ul Inzynierska,3 – 55/221 Jelcz Laskowicwe, VAT PL 8992541788 (hereinafter referred to as “ <b>Company</b> ” or “ <b>Data Controller</b> ”)
	<b>DATA PROTECTION OFFICER (DPO)</b>	You can contact the DPO at the following email address: <a href="mailto:dpo_egp@elica.com">dpo_egp@elica.com</a>


	<p><b>PERSONAL DATA PROCESSED</b></p> <p>Data Controller shall process the data provided by the reporting party to represent the alleged unlawful conduct, of which it has become aware, committed by persons who in different manners interact with the Company, in order to carry out all necessary investigative activities aimed at verifying the existence of the fact being reported and the adoption of any consequent measures. Data collected and processed include personal data and contact details should the reporting party decide not to remain anonymous and to access the Portal on a "nominative" basis, data relating to the employment relationship, the organization’s role covered, as well as any relevant element in aforementioned report (hereinafter referred to as "<b>Common Data</b>"). Data Controller shall process data belonging to special categories, i.e. data revealing, inter alia, racial and ethnic origin, data concerning health and sex life hereinafter referred to as "<b>Specific Data</b>"), only in the case you freely choose to provide it as the characterizing elements of your report. Common Data and Specific Data are hereinafter jointly referred to as "<b>Personal Data</b>". Personal Data can be provided directly by filling in the appropriate fields when sending the report or thereupon, should you decide to add further details in your report, via the Portal's messaging system (chat), which allows you to establish a virtual interview with the body in charge of the report management.</p>
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	<b>PURPOSES OF DATA PROCESSING</b>		<b>LEGAL BASIS OF DATA PROCESSING</b>		<b>DATA RETENTION PERIOD</b>
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<p>1) correct and complete management of the Whistleblowing procedure in compliance with the relevant legislation in force;</p> <p>2) required investigation activities aimed at verifying the existence of the fact being reported and the adoption of any consequent measures.</p> <p>Personal Data provided by you in reporting the alleged unlawful conduct for the integrity of the Company - and as a result of your employment, service to, supply of, or collaboration in relationship with the Company - shall be processed by the Company itself holding the capacity to manage the aforementioned situations.</p> <p>Personal Data shall therefore be acquired automatically from the report and/or in deeds and documents annexed thereto, and shall refer to the reporting party as well as to persons indicated as allegedly responsible for the unlawful conduct, and to those who in various capacities were allegedly involved in the events reported. In particular, in order to carry out the necessary investigation activities aimed at verifying the existence of what has been reported, and take necessary corrective measures and appropriate disciplinary and/or judicial action against those responsible for the unlawful conduct.</p>	<p>Pursuant to Article 6(1)(c) of the European Regulation No. 679/2016, all personal data collected within the scope of this processing are strictly functional and necessary for the pursuit of the provisions of Legislative Decree No. 24/2023.</p>	<p>In particular, personal data collected is retained for a period not exceeding five years, starting from the Report receipt date and for all the time necessary to carry out any proceedings arising from the Report management activity (disciplinary, criminal, accounting ones). The foregoing is without prejudice to the retention of personal data over a longer period in relation to any requests made by public authorities and Data Protection Authorities. Similarly, this retention of personal data, including specific data over an extended period within the limitations prescribed by rights, pursuant to the right of defense connected to any eventual disputes.</p>
<p>If necessary, to ascertain, exercise or defend the Company's rights in court.</p>	<p>The legal basis for data processing is the legitimate interest of the Company, pursuant to Article 6.1(f) of the GDPR.</p>	<p>Personal Data shall be processed for the entire duration of any litigation, until the deadline for appeal has expired</p>
<p>After the expiry of the aforementioned retention periods, Personal Data shall be destroyed or rendered anonymous, according to the terms prescribed by the procedures adopted by the Company.</p>		

	<b>PROVISION OF DATA</b>
	Provision of the reporting party's Personal Data is purely optional; therefore, failure to provide such data, whether in part or inexactly, does not prevent the Company from initiating the necessary preliminary investigation. Should the reporter intend to proceed with an anonymous report, then it shall only be taken into consideration if it is circumstantial and provided with great detail and therefore capable of providing and bringing facts and situations that can be connected to their specific contexts. On the other hand, it is left to each reporting party to decide which further Personal Data to provide.

	<b>DATA RECIPIENTS</b>
	Personal Data collected shall be communicated mainly to third parties and/or recipients whose activity is necessary for the performance of report management activities, as well as to comply with certain legal obligations. In particular, Personal Data may be transmitted to: a) Whistleblowing managers identified by Data Controller; b) the company appointed to manage the Portal, in its capacity as External Manager pursuant to and for the purposes of Article 28 GDPR; c) external consultants (e.g. law firms) that may be involved in the report preliminary investigation phase; d) company functions involved in report acceptances, examination and evaluation activities; e) person(s) in charge of the function(s) concerned by the report; f) corporate positions in charge of investigating the report in those cases where their knowledge is indispensable for understanding the facts reported and/or for conducting the relevant investigation and/or processing activities; g) institutions and/or Public Authorities, Judicial Authorities, Police Bodies, Investigative Agencies; h) supervisory body. Your Personal Data shall in no way be disseminated or disclosed to parties other than the aforementioned ones .

	<b>SUBJECTS AUTHORIZED IN DATA PROCESSING</b>
	Data may be processed by employees belonging to corporate departments in charge of the collection of data for the aforementioned purposes, who have been expressly authorised to do so and who have received adequate operating instructions.

	<b>TRANSFER OF PERSONAL DATA TO EXTRA- EUROPEAN UNION COUNTRIES</b>
	Data Controller shall not transfer your Personal Data outside the European Economic Area.

	<b>RIGHTS OF THE DATA SUBJECT - COMPLAINT TO THE SUPERVISORY AUTHORITY</b>
	The data subject may exercise the rights in Articles 15-22 of GDPR towards the data Controller and, in particular, may request access to their own Data, as well as cancellation, amendment of inaccurate Data, integration of incomplete Data, limitation of data processing in the cases provided for by Article 18 GDPR <sup>4</sup> , where applicable.

<sup>4</sup> Pursuant to Article 18 of the GDPR, the data subject is entitled to obtain a limitation of data processing from the data controller, in one of the following cases:

- (a) the data subject disputes the accuracy of personal data, for the period necessary to the controller to verify accuracy of such personal data;
- (b) data processing is unlawful and the data subject opposes the cancellation of personal data and instead requests to limit the use of the same;
- (c) although the data controller no longer needs the personal data for processing purposes, such personal data is necessary to the data subject to ascertain, exercise or defend one of their rights in a Court of Law;
- (d) the data subject opposed to data processing pursuant to Article 21(1), pending the verification as to whether the legitimate grounds of the data controller prevail over those of the data subject.

Should data processing be limited as pursuant to paragraph 1, such personal data shall, except for storage, only be processed with the consent of the data subject or to ascertain, exercise or defend one of their rights in a Court of Law or to protect the rights of another natural or legal person or for reasons of substantial public interest of the European Union or of a Member State.



Furthermore, should data processing be based on a consent or contract and performed by automated tools, the data subject has the right to receive the Data in a structured, commonly used and machine-readable format, and, if technically possible, to transmit it to another controller without any hindrance. The data subject is entitled to revoke their consent at any time by requesting unsubscription from the newsletter service by clicking on the unsubscribe link at the bottom of each email.

The data subject is entitled to oppose to the processing of their Data at any time, in a simple manner and free of charge, for reasons concerning a specific situation in the case of legitimate interest of the Data Controller.

Such rights may be exercised by sending an email to the Data Controller at: [privacyegp@elica.com](mailto:privacyegp@elica.com). Should data subjects intend to exercise their rights, then the Company may ask them to identify before handling their request.

The data subject may lodge a complaint with the competent supervisory authority (Art. 77 GDPR) and take legal action (Art. 79 GDPR), as well.




**INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF (EU) REGULATION 2016/679 (“GDPR”) WHISTELBLOWING PORTAL**

**Elica GmbH**, as Data Controller, pursuant to article 13 of the GDPR, intends to provide its staff, partners, clients, suppliers, consultants, collaborators and, more in general, anyone who has undertaken relations with Elica GmbH ("Data Subject" or collectively "Data Subjects") with specific information on the processing of personal data deemed necessary when reporting on the Whistleblowing Portal (hereinafter referred to as "Portal"), which is accessible via links on Data Controller's website, in accordance with article 13 of the Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 ("GDPR"), as well as European and national legislation supplementing and/or amending it ("Applicable Privacy Legislation"), including the rules on the protection of personal data set out in Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018 (hereinafter referred to as "Privacy Code").

	<b>DATA CONTROLLER</b>	<b>Elica GMBH</b> , Steiner Str. 15, Haus B 2. OG, 81369 München E-Mail: <a href="mailto:markenvertrieb-elica@elica.com">markenvertrieb-elica@elica.com</a> Tel.: +4989540288989 hereinafter referred to as “ <b>Company</b> ” or “ <b>Data Controller</b> ”)
	<b>DATA PROTECTION OFFICER (DPO)</b>	DPO can be contacted at: <a href="mailto:privacyElicaGmbH@elica.com">privacyElicaGmbH@elica.com</a>


	<p><b>PERSONAL DATA PROCESSED</b></p> <p>Data Controller shall process the data provided by the reporting party to represent the alleged unlawful conduct, of which it has become aware, committed by persons who in different manners interact with the Company, in order to carry out all necessary investigative activities aimed at verifying the existence of the fact being reported and the adoption of any consequent measures. Data collected and processed include personal data and contact details should the reporting party decide not to remain anonymous and to access the Portal on a "nominative" basis, data relating to the employment relationship, the organization's role covered, as well as any relevant element in aforementioned report (hereinafter referred to as "<b>Common Data</b>"). Data Controller shall process data belonging to special categories, i.e. data revealing, inter alia, racial and ethnic origin, data concerning health and sex life hereinafter referred to as "<b>Specific Data</b>"), only in the case you freely choose to provide it as the characterizing elements of your report. Common Data and Specific Data are hereinafter jointly referred to as "<b>Personal Data</b>". Personal Data can be provided directly by filling in the appropriate fields when sending the report or thereupon, should you decide to add further details in your report, via the Portal's messaging system (chat), which allows you to establish a virtual interview with the body in charge of the report management.</p>
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A data subject who obtained a limitation in data processing pursuant to paragraph 1, shall be informed by the data controller before such limitation is canceled.


	PURPOSES OF DATA PROCESSING		LEGAL BASIS OF DATA PROCESSING		DATA RETENTION PERIOD
	<p>1) correct and complete management of the Whistleblowing procedure in compliance with the relevant legislation in force;</p> <p>2) required investigation activities aimed at verifying the existence of the fact being reported and the adoption of any consequent measures.</p> <p>Personal Data provided by you in reporting the alleged unlawful conduct for the integrity of the Company - and as a result of your employment, service to, supply of, or collaboration in relationship with the Company - shall be processed by the Company itself holding the capacity to manage the aforementioned situations.</p> <p>Personal Data shall therefore be acquired automatically from the report and/or in deeds and documents annexed thereto, and shall refer to the reporting party as well as to persons indicated as allegedly responsible for the unlawful conduct, and to those who in various capacities were allegedly involved in the events reported. In particular, in order to carry out the necessary investigation activities aimed at verifying the existence of what has been reported, and take necessary corrective measures and appropriate disciplinary and/or judicial action against those responsible for the unlawful conduct.</p>		<p>Pursuant to Article 6(1)(c) of the European Regulation No. 679/2016, all personal data collected within the scope of this processing are strictly functional and necessary for the pursuit of the provisions of Legislative Decree No. 24/2023.</p>		<p>In particular, personal data collected is retained for a period not exceeding five years, starting from the Report receipt date and for all the time necessary to carry out any proceedings arising from the Report management activity (disciplinary, criminal, accounting ones). The foregoing is without prejudice to the retention of personal data over a longer period in relation to any requests made by public authorities and Data Protection Authorities. Similarly, this retention of personal data, including specific data over an extended period within the limitations prescribed by rights, pursuant to the right of defense connected to any eventual disputes.</p>
	<p>If necessary, to ascertain, exercise or defend the Company's rights in court.</p>		<p>The legal basis for data processing is the legitimate interest of the Company, pursuant to Article 6.1(f) of the GDPR.</p>		<p>Personal Data shall be processed for the entire duration of any litigation,</p>

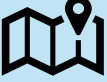


		until the deadline for appeal has expired
After the expiry of the aforementioned retention periods, Personal Data shall be destroyed or rendered anonymous, according to the terms prescribed by the procedures adopted by the Company.		

	<b>PROVISION OF DATA</b>
	Provision of the reporting party's Personal Data is purely optional; therefore, failure to provide such data, whether in part or inexactly, does not prevent the Company from initiating the necessary preliminary investigation. Should the reporter intend to proceed with an anonymous report, then it shall only be taken into consideration if it is circumstantial and provided with great detail and therefore capable of providing and bringing facts and situations that can be connected to their specific contexts. On the other hand, it is left to each reporting party to decide which further Personal Data to provide.

	<b>DATA RECIPIENTS</b>
	Personal Data collected shall be communicated mainly to third parties and/or recipients whose activity is necessary for the performance of report management activities, as well as to comply with certain legal obligations. In particular, Personal Data may be transmitted to: a) Whistleblowing managers identified by Data Controller; b) the company appointed to manage the Portal, in its capacity as External Manager pursuant to and for the purposes of Article 28 GDPR; c) external consultants (e.g. law firms) that may be involved in the report preliminary investigation phase; d) company functions involved in report acceptances, examination and evaluation activities; e) person(s) in charge of the function(s) concerned by the report; f) corporate positions in charge of investigating the report in those cases where their knowledge is indispensable for understanding the facts reported and/or for conducting the relevant investigation and/or processing activities; g) institutions and/or Public Authorities, Judicial Authorities, Police Bodies, Investigative Agencies; h) supervisory body. Your Personal Data shall in no way be disseminated or disclosed to parties other than the aforementioned ones.

	<b>SUBJECTS AUTHORIZED IN DATA PROCESSING</b>
	Data may be processed by employees belonging to corporate departments in charge of the collection of data for the aforementioned purposes, who have been expressly authorised to do so and who have received adequate operating instructions.

	<b>TRANSFER OF PERSONAL DATA TO EXTRA- EUROPEAN UNION COUNTRIES</b>
	Data Controller shall not transfer your Personal Data outside the European Economic Area.

	<b>RIGHTS OF THE DATA SUBJECT - COMPLAINT TO THE SUPERVISORY AUTHORITY</b>
	The data subject may exercise the rights in Articles 15-22 of GDPR towards the data Controller and, in particular, may request access to their own Data, as well as cancellation, amendment of inaccurate Data, integration of incomplete Data, limitation of data processing in the cases provided for by Article 18 GDPR <sup>5</sup> , where applicable.

<sup>5</sup> Pursuant to Article 18 of the GDPR, the data subject is entitled to obtain a limitation of data processing from the data controller, in one of the following cases:

- (a) the data subject disputes the accuracy of personal data, for the period necessary to the controller to verify accuracy of such personal data;
- (b) data processing is unlawful and the data subject opposes the cancellation of personal data and instead requests to limit the use of the same;
- (c) although the data controller no longer needs the personal data for processing purposes, such personal data is necessary to the data subject to ascertain, exercise or defend one of their rights in a Court of Law;



Furthermore, should data processing be based on a consent or contract and performed by automated tools, the data subject has the right to receive the Data in a structured, commonly used and machine-readable format, and, if technically possible, to transmit it to another controller without any hindrance. The data subject is entitled to revoke their consent at any time by requesting unsubscription from the newsletter service by clicking on the unsubscribe link at the bottom of each email.

The data subject is entitled to oppose to the processing of their Data at any time, in a simple manner and free of charge, for reasons concerning a specific situation in the case of legitimate interest of the Data Controller.

Such rights may be exercised by sending an email: [privacyElicaGmbH@elica.com](mailto:privacyElicaGmbH@elica.com)

Should data subjects intend to exercise their rights, then the Company may ask them to identify before handling their request.

The data subject may lodge a complaint with the competent supervisory authority (Art. 77 GDPR) and take legal action (Art. 79 GDPR), as well.

**INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF (EU) REGULATION 2016/679 (“GDPR”) WHISTELBLOWING PORTAL**

**Elicamex SA de CV**, as Data Controller, pursuant to article 13 of the GDPR, intends to provide its staff, partners, clients, suppliers, consultants, collaborators and , more in general, anyone who has undertaken relations with Elicamex SA de CV ("Data Subject " or collectively "Data Subjects ") with specific information on the processing of personal data deemed necessary when reporting on the Whistleblowing Portal (hereinafter referred to as "Portal"), which is accessible via links on Data Controller’s website, in accordance with article 13 of the Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 ("GDPR") , as well as European and national legislation supplementing and/or amending it ("Applicable Privacy Legislation").




	<b>DATA CONTROLLER</b>	<b>Elicamex SA de C.V.</b> in Santiago de Queretaro, Queretaro, Mexico , Av. La Noria 102, identified with Tax Identification and VAT Number ELI060102RK8 (“ <b>Company</b> ” or “ <b>Data Controller</b> ”)
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	<b>PERSONAL DATA PROCESSED</b>	Data Controller shall process the data provided by the reporting party to represent the alleged unlawful conduct, of which it has become aware, committed by persons who in different manners interact with the Company, in order to carry out all necessary investigative activities aimed at verifying the existence of the fact being reported and the adoption of any consequent measures. Data collected and processed include personal data and contact details should the reporting party decide not to remain anonymous and to access the Portal on a "nominative" basis, data relating to the employment relationship, the organization’s role covered, as well as any relevant element in aforementioned report (hereinafter referred to as " <b>Common Data</b> "). Data Controller shall process data belonging to special categories, i.e. data revealing, inter alia, racial and ethnic origin, data concerning health and sex life hereinafter referred to as " <b>Specific Data</b> "), only in the case you freely choose to provide it as the characterizing elements of your report. Common Data and Specific Data are hereinafter jointly referred to as " <b>Personal Data</b> ". Personal Data can be provided directly by filling in the appropriate fields when sending the report or thereupon, should you decide to add further details in your report, via the Portal's messaging system (chat), which allows you to establish a virtual interview with the body in charge of the report management.
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(d) the data subject opposed to data processing pursuant to Article 21(1), pending the verification as to whether the legitimate grounds of the data controller prevail over those of the data subject.


Should data processing be limited as pursuant to paragraph 1, such personal data shall, except for storage, only be processed with the consent of the data subject or to ascertain, exercise or defend one of their rights in a Court of Law or to protect the rights of another natural or legal person or for reasons of substantial public interest of the European Union or of a Member State.


A data subject who obtained a limitation in data processing pursuant to paragraph 1, shall be informed by the data controller before such limitation is canceled.

	<b>PURPOSES OF DATA PROCESSING</b>		<b>LEGAL BASIS OF DATA PROCESSING</b>		<b>DATA RETENTION PERIOD</b>
	<p>1) correct and complete management of the Whistleblowing procedure in compliance with the relevant legislation in force;</p> <p>2) required investigation activities aimed at verifying the existence of the fact being reported and the adoption of any consequent measures.</p> <p>Personal Data provided by you in reporting the alleged unlawful conduct for the integrity of the Company - and as a result of your employment, service to, supply of, or collaboration in relationship with the Company - shall be processed by the Company itself holding the capacity to manage the aforementioned situations.</p> <p>Personal Data shall therefore be acquired automatically from the report and/or in deeds and documents annexed thereto, and shall refer to the reporting party as well as to persons indicated as allegedly responsible for the unlawful conduct, and to those who in various capacities were allegedly involved in the events reported. In particular, in order to carry out the necessary investigation activities aimed at verifying the existence of what has been reported, and take necessary corrective measures and appropriate disciplinary and/or judicial action against those responsible for the unlawful conduct.</p>		<p>Pursuant to Article 6(1)(c) of the European Regulation No. 679/2016, all personal data collected within the scope of this processing are strictly functional and necessary for the pursuit of the provisions of Legislative Decree No. 24/2023.</p>		<p>In particular, personal data collected is retained for a period not exceeding five years, starting from the Report receipt date and for all the time necessary to carry out any proceedings arising from the Report management activity (disciplinary, criminal, accounting ones). The foregoing is without prejudice to the retention of personal data over a longer period in relation to any requests made by public authorities and Data Protection Authorities. Similarly, this retention of personal data, including specific data over an extended period within the limitations prescribed by rights, pursuant to the right of defense connected to any eventual disputes.</p>
	<p>If necessary, to ascertain, exercise or defend the Company's rights in court.</p>		<p>The legal basis for data processing is the legitimate interest of the Company, pursuant to Article 6.1(f) of the GDPR.</p>		<p>Personal Data shall be processed for the entire duration of any litigation,</p>

		until the deadline for appeal has expired
After the expiry of the aforementioned retention periods, Personal Data shall be destroyed or rendered anonymous, according to the terms prescribed by the procedures adopted by the Company.		

	<b>PROVISION OF DATA</b>
	Provision of the reporting party's Personal Data is purely optional; therefore, failure to provide such data, whether in part or inexactly, does not prevent the Company from initiating the necessary preliminary investigation. Should the reporter intend to proceed with an anonymous report, then it shall only be taken into consideration if it is circumstantial and provided with great detail and therefore capable of providing and bringing facts and situations that can be connected to their specific contexts. On the other hand, it is left to each reporting party to decide which further Personal Data to provide.

	<b>DATA RECIPIENTS</b>
	Personal Data collected shall be communicated mainly to third parties and/or recipients whose activity is necessary for the performance of report management activities, as well as to comply with certain legal obligations. In particular, Personal Data may be transmitted to: a) Whistleblowing managers identified by Data Controller; b) the company appointed to manage the Portal, in its capacity as External Manager pursuant to and for the purposes of Article 28 GDPR; c) external consultants (e.g. law firms) that may be involved in the report preliminary investigation phase; d) company functions involved in report acceptances, examination and evaluation activities; e) person(s) in charge of the function(s) concerned by the report; f) corporate positions in charge of investigating the report in those cases where their knowledge is indispensable for understanding the facts reported and/or for conducting the relevant investigation and/or processing activities; g) institutions and/or Public Authorities, Judicial Authorities, Police Bodies, Investigative Agencies; h) supervisory body. Your Personal Data shall in no way be disseminated or disclosed to parties other than the aforementioned ones .

	<b>SUBJECTS AUTHORIZED IN DATA PROCESSING</b>
	Data may be processed by employees belonging to corporate departments in charge of the collection of data for the aforementioned purposes, who have been expressly authorised to do so and who have received adequate operating instructions.
	<b>RIGHTS OF THE DATA SUBJECT - COMPLAINT TO THE SUPERVISORY AUTHORITY</b>
	The data subject may exercise the rights in Articles 15-22 of GDPR towards the data Controller and, in particular, may request access to their own Data, as well as cancellation, amendment of inaccurate Data, integration of incomplete Data, limitation of data processing in the cases provided for by Article 18 GDPR <sup>6</sup> , where applicable.

<sup>6</sup> Pursuant to Article 18 of the GDPR, the data subject is entitled to obtain a limitation of data processing from the data controller, in one of the following cases:

- (a) the data subject disputes the accuracy of personal data, for the period necessary to the controller to verify accuracy of such personal data;
- (b) data processing is unlawful and the data subject opposes the cancellation of personal data and instead requests to limit the use of the same;
- (c) although the data controller no longer needs the personal data for processing purposes, such personal data is necessary to the data subject to ascertain, exercise or defend one of their rights in a Court of Law;
- (d) the data subject opposed to data processing pursuant to Article 21(1), pending the verification as to whether the legitimate grounds of the data controller prevail over those of the data subject.

Should data processing be limited as pursuant to paragraph 1, such personal data shall, except for storage, only be processed with the consent of the data subject or to ascertain, exercise or defend one of their rights in a Court of Law or to protect the rights of another natural or legal person or for reasons of substantial public interest of the European Union or of a Member State.

A data subject who obtained a limitation in data processing pursuant to paragraph 1, shall be informed by the data controller before such limitation is canceled.



Furthermore, should data processing be based on a consent or contract and performed by automated tools, the data subject has the right to receive the Data in a structured, commonly used and machine-readable format, and, if technically possible, to transmit it to another controller without any hindrance. The data subject is entitled to revoke their consent at any time by requesting unsubscription from the newsletter service by clicking on the unsubscribe link at the bottom of each email.

The data subject is entitled to oppose to the processing of their Data at any time, in a simple manner and free of charge, for reasons concerning a specific situation in the case of legitimate interest of the Data Controller.

Such rights may be exercised by sending a communication to the Data Controller.

Should data subjects intend to exercise their rights, then the Company may ask them to identify before handling their request.

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The data subject may lodge a complaint with the competent supervisory authority (Art. 77 GDPR) and take legal action (Art. 79 GDPR), as well.