

PRIVACY POLICY - WHISTLEBLOWING Legislative Decree 24/2023

Information document pursuant to Article 13 GDPR for the reporting party

1. THE DATA CONTROLLER

The data controller, pursuant to Articles 4 and 24 of EU Reg. 2016/679 is Cattaneo Impianti Srl, with registered office in Lomazzo, via della Traversa in the person of its legal representative.

2. TYPE OF DATA THAT MAY BE PROCESSED

With reference to the processing that is the subject of this notice, the personal data processed shall be those relating to the reports made by whistleblowers, including the contents of the reports themselves, which may include personal data relating to third parties.

Personal data processed on the person making the report (the "whistleblower"), if the report is not made anonymously:

- First and last name
- Contact details
- Modality and time of the report
- Other information provided by the person concerned (personal opinions, consequences suffered as a result of the alleged breaches, etc.)

The persons concerned are: (a) employees (persons who have established an employment contract with the employer, including temporary workers), (b) senior persons who hold administrative, management and representative functions of the company and persons delegated by the company to perform tasks involving the use of the company's name and who may influence its management and control, (c) workers such as contractors/subcontractors, consultants employees of employment agencies or similar, d) third parties such as public and private sector employees who interact with the Controller by virtue of a contract, including workers, civil servants, self-employed workers, employees of contractors/subcontractors, shareholders, persons who are part of the administrative, management or supervisory bodies of the company, including any non-executive members, volunteers, trainees, former employees and job applicants, e) relatives persons in the same employment context as the reporting person who are related to him/her by a stable emotional or kinship relationship up to the fourth degree.

3. PURPOSES, LEGAL BASIS OF THE PROCESSING, DATA RETENTION PERIOD AND NATURE OF THE PROVISION OF DATA

The data of a personal nature provided, will be processed in compliance with the conditions of lawfulness under Art. 6 EU Reg. 2016/679 (GDPR) for the following purposes:

- a) receipt and handling of reports and/or communications of which it has become aware in the course of a legal relationship, pursuant to Article 3 of Legislative Decree no. 24/2023
- b) disclosure of the identity of the person making the report and/or any other information from which such identity may be inferred, directly or indirectly, to persons other than those competent to receive and follow up the report, pursuant to Article 12(2) of Legislative Decree no. 24/2023.

The processing is necessary to fulfil a legal obligation to which the data controller is subject (Legislative Decree 24/2023) and the processing is based on consent to the processing of personal data.

4. NATURE OF CONFERMENT

The provision of personal data subject to reporting is mandatory, as it is indispensable in order to be able to fulfil the related legal obligations (Legislative Decree 24/2023 and, if adopted MOGC, Legislative Decree 231/2001). The provision of personal data by the reporter is optional and failure to provide it will not invalidate the report.

5. RETENTION PERIOD

As regards the purpose a), the retention period will be for the time strictly necessary to process the report and, in any case, no longer than 5 years from the date of communication of the final outcome of the reporting procedure (Article 14 of Legislative Decree no. 24/2023).

As regards purpose b) for the time strictly necessary to process the report or until the consent is revoked, unless the identity of the reporter has already been disclosed.

6. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE DATA

The data will not be disseminated; however, they may be communicated to recipients, who will process the data in their capacity as data processors and/or as natural persons acting under the authority of the Data Controller and Data Processor, for the purposes listed above.

The recipients identified are as follows:

- the person or internal office, or the external party entrusted with the management of the internal reporting channel;
- third parties for the management of the platforms for sending and/or managing reports;
- judicial authorities and public authorities, including the ANAC.

7. METHODS OF PROCESSING

Processing will be carried out in automated and manual form, using methods and tools designed to guarantee maximum security and confidentiality, by persons specifically appointed and trained to manage the reporting channel.

8. DATA TRANSFER TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANISATION AND GUARANTEES

Personal data collected will not be transferred to countries outside the European Union

9. RIGHTS OF DATA SUBJECTS

With regard to the personal data itself, you may exercise the rights provided for in Articles 15 et seq. of the GDPR. Should you sign any form of consent to the processing requested by the company, please note that you may revoke it at any time, subject to the limits described above.

The aforementioned rights may also be exercised by you by sending communications to the following e-mail address: info@cattaneoimpianti.com