










WHISTLEBLOWING PRIVACY NOTICE

Dear Data Subject,

We would like to inform you that the “European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data” (“GDPR” from now on) provides for the protection of individuals with regard to the processing of personal data as a fundamental right. Therefore, **ELEMASTER SPA Tecnologie Elettroniche**, pursuant to article 13 GDPR, it provides you with the following information:

	<p>A. CATEGORIES OF DATA: the subject of the processing may be your personal data such as identifying, personal, contact, job-related, and any additional information related to the misconduct and the persons involved as well as any other personal data contained within the report and/or the attached supporting documentation.</p>
	<p>B. DATA CONTROLLER: the data controller is ELEMASTER SPA Tecnologie Elettroniche, located in VIA Garcia Lorca, 29 – 23871 LOMAGNA (LC), VAT Number 01946180138, and can be contacted at phone 039999121 or at mail elemaster@elemaster.com.</p>
	<p>C. SOURCE OF PERSONAL DATA: personal data held by the Controller are collected directly from the data subject. Subsequently, the Data Controller may collect other data during the investigation phase.</p>
	<p>D. PURPOSE OF DATA PROCESSING AND LEGAL BASIS personal data are processed by the Data Controller in order to pursue the following purposes:</p> <ul style="list-style-type: none">• Purposes related to legal obligations, Legislative Decree 24/2023, concerning the protection of persons who report violations of Union law and national regulatory provisions. Personal data are processed as part of the management of "whistleblowing" reports, exclusively for the purposes of investigating and ascertaining the reported facts and taking any related actions.
	<p>E. RECIPIENTS OF THE DATA: within the limits pertinent to the purposes, your data are communicated to Supervisory Board, which manages the signaling channel; to the National Anticorruption Authority; to the ordinary judicial authority or to the accounting judicial authority, in the cases provided for by the regulations. In addition, after adopting appropriate measures to ensure the confidentiality of the identity of the reporter and any further element of the report, to the company that provides computer services that enable the operation of the computer tools that allow the report, duly appointed as data processor ex art. 28 GDPR; to other subjects related to the processing activities; to public and private entities by legal obligation; to law firms or other professionals qualified for the purpose of the study and resolution of any legal issues; to trade unions in the cases provided for by the provisions of law and contract and to other subjects functional to the achievement of the purposes set out above. Your data will not be disseminated in any way.</p>
	<p>F. TRANSFER OF PERSONAL DATA BETWEEN COUNTRIES: the data collected are not subject to transfer to third countries outside the European Economic Space.</p>
	<p>G. RETENTION PERIOD: the data collected will be retained for a period of time necessary for the processing of the report and in any case not more than five years from the date of the communication of the final outcome of the reporting procedure. Verification of the obsolescence of retained data in relation to the purposes for which they were collected is carried out periodically.</p>
	<p>H. RIGHTS OF THE DATA SUBJECT: the rights referred to in Articles from 15 to 22 of Regulation (EU) 2016/679 may be exercised within the limits of the provisions of Article 2-undecies of Legislative Decree No. 196 of June 30, 2003, to which reference is made.</p>
	<p>I. OBLIGATION OF THE DATA SUBJECT TO PROVIDE PERSONAL DATA: the provision of personal data is optional. However, failure to provide it may affect the investigation of the report.</p>

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J. METHODS OF DATA PROCESSING:

The data subject has an internal signaling channel available.

Internal reporting channel through internal platform: the use of the channel ensures suitable measures that guarantee the confidentiality of the information being reported. The platform provider is unable to identify the whistleblower: the system does not store data of the devices used to make the report such as IP address and browsing data, the communication channel adopts RSA encryption, and the database is encrypted.

The face-to-face meeting, upon request, will be held at the manager's premises in a manner that ensures confidentiality and the minutes of the meeting will be forwarded via the platform.



K. AUTOMATED DECISION-MAKING PROCESSES: No automated decision-making processes are performed