











**PRIVACY - REPORTED (WHISTLEBLOWING –D.LGS. N. 24/2023)**






**Information document in accordance with and for the purposes of Article 14 Regulation (EU) 2016/679 (GDPR)**

	<p><b>WHY THIS INFORMATION</b></p> <p><b>1. WHO IS THE DATA CONTROLLER? HOW TO CONTACT HIM?</b>                  The Data Controller is Battaglia srl, with registered office in Via Turati, 16 - Misinto, 20826 (MB), in the person of its pro-tempore Legal Representative, who can be contacted for any information through the number: 0296328971 or the e-mail address: <a href="mailto:mail@battagliacontract.com">mail@battagliacontract.com</a></p>
	<p><b>2. TYPE OF DATA THAT CAN BE PROCESSED</b></p> <p>Personal data: any information relating to an identified or identifiable natural person (“data subject”); an identifiable person is one who can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more characteristic elements of his or her physical, physiological, genetic, mental, economic, cultural or social identity; (C26, C27, C30).</p> <p>The data processed will be those related to the reports made by whistleblowers, which may include data related to third parties, i.e., the reported individuals.</p> <ul style="list-style-type: none"> <li>- Data related to the whistleblower, which may be provided by the whistleblower: First name, last name, or other information identifying the person to whom the reported facts can be attributed;;</li> <li>- Other personal information such as telephone number, e-mail address, social security number;</li> <li>- Other information disclosed by the reporter;</li> <li>- Any Special Data (see Art. 9 GDPR): personal data capable of revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to a person’s health or sex life or sexual orientation;</li> <li>- Any Data relating to criminal convictions and offenses or related security measures (see Art. 10 GDPR): personal data capable of revealing measures referred to in Article 3, paragraph 1, letters a) to o) and r) to u), of Presidential Decree No. 313 of November 14, 2002, on criminal records, registry of administrative sanctions dependent on crime and related pending charges, or the quality of accused or suspected person under Articles 60 and 61 of the Code of Criminal Procedure.</li> </ul> <p>Category of data subjects: The data subjects of this processing are: i) Reported person: the natural person or legal entity mentioned in the internal report as the person to whom the violation is attributed or as a person otherwise involved in the reported violation (art. 2, paragraph 1, lett. l), of Leg. No. 24/2023); as well as persons in various capacities involved in the reported events: ii) Facilitator: the natural person who assists a reporting person in the reporting process, operating within the same work context and whose assistance must be kept confidential; iii) Person informed of the facts.</p>

**3. PURPOSE OF PROCESSING, LEGAL BASIS, STORAGE PERIOD, DATA SOURCE**

 <p><b>PURPOSE OF PROCESSING</b></p>	 <p><b>LEGAL BASIS</b></p>	 <p><b>DATA RETENTION PERIOD</b></p>	 <p><b>SOURCE OF DATA</b></p>
<p>A) Management of whistleblowing reports. In particular, use of your personal data collected as a result of the submission of reports against you regarding conduct, acts or omissions that harm the public interest or the integrity of the public administration or private entity, pursuant to Article 2, paragraph 1 letter a) of Legislative Decree No. 24/2023.</p>	<p>The processing is necessary to fulfill a legal obligation (pursuant to Legislative Decree No. 24/2023) to which the data controller is subject (C45).</p> <p>Art. 6(1)(c), GDPR</p> <p>The processing of “special” data is based on the fulfillment of obligations and the exercise of specific rights of the Data Controller and the Data Subject in the</p>	<p>For the time strictly necessary for the processing of the report and, in any case, no longer than 5 years from the date of the communication of the final outcome of the reporting procedure (Article 14 of Legislative Decree No. 24/2023).</p> <p>In the event that a lawsuit is instituted, the aforementioned period shall be extended until</p>	<p>The source from which personal data originates is the report made by the reporting party (Art. 3, paragraphs 3 and 4, of Legislative Decree No. 24/2023) and others during the investigation.</p>

 <b>PURPOSE OF PROCESSING</b>	 <b>LEGAL BASIS</b>	 <b>DATA RETENTION PERIOD</b>	 <b>SOURCE OF DATA</b>
	field of labor law (Art. 9(2)(b), GDPR;  The processing of data relating to criminal convictions and offenses, taking into account the provisions of Art. 10 GDPR, is based on the legal obligation to which the Data Controller is subject (Art. 6(1)(c))	the exhaustion of the levels of judgment.  Personal data that are manifestly not useful for the processing of a specific report shall not be collected or, if accidentally collected, shall be deleted immediately.	

	<p><b>4. TO WHOM WILL PERSONAL DATA BE DISCLOSED? RECIPIENTS OF THE DATA</b></p> <p>Personal data will be communicated to parties who will process the data as autonomous Data Controllers or Data Processors (Art. 28 GDPR) and will be processed by individuals (Art. 29 GDPR and/or Art. 2-quaterdecies Legislative Decree No. 196/2003) acting under the authority of the Data Controller and Data Processors on the basis of specific instructions provided regarding the purposes and methods of processing.</p> <p>The data will be communicated to recipients belonging to the following categories:</p> <ul style="list-style-type: none"> <li>- the person or internal office or external party entrusted with the management of the internal whistleblowing channel;</li> <li>- third parties for the provision of the whistleblowing platform adopted by the Data Controller; - Judicial authorities and public authorities (including ANAC).</li> </ul>
	<p><b>5. IS THERE A DATA TRANSFER TO A COUNTRY OUTSIDE SEE?</b></p> <p>Personal data will not be transferred to countries outside the EEA.</p>
	<p><b>6. IS THERE AN AUTOMATED PROCESS?</b></p> <p>Personal data will undergo traditional manual, electronic and automated processing. It should be noted that fully automated decision-making processes are not carried out.</p>
	<p><b>7. RIGHTS OF INTERESTED PARTIES</b></p> <p>You may assert your rights as expressed in Art. 15 et seq. GDPR, by contacting the Data Controller at the e-mail address <a href="mailto:mail@battagliacontract.com">mail@battagliacontract.com</a>, or at the contacts listed above. You have the right, at any time, to request rectification (Art. 16) and access to your personal data (Art. 15). These rights may not be exercised if it may result in actual and concrete prejudice to the confidentiality of the identity of the person who reports violations of which he or she has become aware by reason of his or her employment relationship or duties performed, pursuant to Legislative Decree No. 24/2023 (art. 2-undecies Legislative Decree No. 196/2003, as amended by art. 24, paragraph 4, of Legislative Decree No. 24/2023).</p> <p>In the event that the data subject considers that the processing of personal data carried out by the Data Controller occurs in violation of the provisions of Regulation (EU) 2016/679, the data subject has the right to lodge a complaint with the Supervisory Authority, in particular in the Member State where he or she normally resides or works or in the place where the alleged violation of the regulation occurred (Privacy Guarantor <a href="https://www.garanteprivacy.it/">https://www.garanteprivacy.it/</a>), or to take appropriate legal action.</p>
	<p><b>8. CHANGES POLICY</b></p> <p>The Data controller may change, modify, add or remove any part of this Notice. In order to facilitate verification of any changes, the Disclosure will contain an indication of the date the Disclosure was updated.</p>

Updated Date: 05.12.2023

**The Data Controller**

  
**Battaglia srl**