

# Privacy policy “whistleblowing”

## (pursuant to It. Legislative Decree no. 24/2023)

The term **whistleblowing** refers to the procedure by which a person may report, disclose or denounce, anonymously or expressly, violations of national or European Union law which harm the public interest or the integrity of the public administration of which he/she has become aware in the context of public or private employment.



### 1. Data controller

**Storti S.p.A.**, with registered office in Via Francesco Dioli, 11, 26045 Motta Baluffi (CR), Tax ID and VAT 00765230198, hereinafter referred to as “**Data Controller**”, guarantees compliance with personal data protection regulations by providing the following information on the processing of data pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation - GDPR) as amended.



### 2. Data processed, purpose and legal basis for processing

The personal data being processed may consist in:

- in the sole case of non-anonymous reports, common personal data provided by the “whistleblowers” through the reporting channel, such as personal data (e.g. name, surname, date and place of birth) and contact data (e.g. landline and/or mobile phone number, postal/e-mail address);
- (*any*) common or special data (as referred to in Art. 9) of the GDPR) of persons involved or mentioned in the report.

The aforementioned personal data are processed by the Controller for the following purposes:

- a) management of the report made pursuant to (It.) Legislative Decree no. 24/2023;
- b) fulfilment of obligations provided for by law or EU regulations;
- c) defence or establishment of its rights in civil, administrative or criminal litigation.

The legal basis legitimising the processing:

- with respect to the purposes set out under 2 letters a) and b) is the fulfilment of a legal obligation (Art. 6.1 letter c) of the GDPR);
- with respect to the purposes under point 2 letter c) is the legitimate interest of the Controller. 6.1 letter f) of the GDPR).



### 3. Nature of the provision

Providing personal data is optional and reporting may also be anonymous. Failure to provide any personal data will have no consequences for the reporting person, but may nevertheless prejudice the investigation of the report.

Indeed, anonymous reports will only be taken into account if they are properly substantiated, so as to bring to light facts and situations related to specific contexts.



### 4. Locations and methods of data processing and storage times

The data collected through the SignalEthic software are processed at the Data Controller's registered office and at the data centre of Sanmarco Informatica S.p.A., as the provider of the software delivery and operational management service, duly appointed as Data Processor.

The data collected will be processed by electronic means or otherwise automated, computerised and telematic tools, or by means of manual processing with logic strictly related to the purposes for which the personal data were collected and, however, in such a way as to guarantee the confidentiality of the reporting person's identity and of the content of the reports and of the related documentation.

The data are stored for the time strictly necessary to manage the purposes for which the data are processed ('principle of storage limitation', Art.5, EU Regulation 2016/679) or in compliance with the deadlines set forth by current regulations and legal obligations.

However, the Data Controller applies rules that prevent the storage of data indefinitely and thus limits the storage time in compliance with the principle of minimising data processing.



### 5. Persons authorised to process, data processors and communication of data

The processing of the data collected is carried out by personnel identified for this purpose and authorised to process them in accordance with specific instructions given in compliance with the applicable regulations.

The data collected, to the extent pertinent to the indicated purposes of the processing and where necessary or instrumental to the performance of said purposes, may be processed by third parties appointed as data Processors, or, as the case may be, communicated to all subjects required for proper performance of the purposes under point 2.

The data collected may be provided in the event of a legitimate request by the Judicial Authority, solely in the cases provided for by law.

Under no circumstances and for no reason whatsoever shall your data be disseminated.



## 6. Data transfer to non-EU countries

The data collected will not be transferred abroad.



## 7. Rights of the data subject

In relation to the Personal Data provided, the data subject has the right to exercise the following rights:

- a. (Art. 7.3 EU Regulation 679/2016 - GDPR) withdrawal of consent;
- b. (Art. 15 EU Regulation 679/2016 - GDPR) access and obtain a copy;
- c. (Art. 16 EU Regulation 679/2016 - GDPR) request rectification;
- d. (Art. 17 EU Regulation 679/2016 - GDPR) request erasure ('right to be forgotten');
- e. (Art. 18 EU Regulation 679/2016 - GDPR) obtain restriction of processing;
- f. (Art. 20 EU Regulation 679/2016 - GDPR) receive them in a structured, commonly used and machine-readable format for the purpose of exercising the right to portability;
- g. (Art. 21 EU Regulation 679/2016 - GDPR) object to the processing.

The data subject may exercise his/her rights, as well as request further information regarding his/her Personal Data, by sending an e-mail to [privacy@storti.it](mailto:privacy@storti.it) specifying in the subject line the content of his/her request.

Requests relating to the exercise of the user's rights shall be processed without undue delay and, however, within one month of the request; only in cases of particular complexity and number of requests may this period be extended by a further two (2) months.

We would like to remind you that it is your right (pursuant to Art. 77 EU Regulation 679/2016 - GDPR) to file a complaint with the Data Protection Authority, whose contact details are available [here](#).

*Last updated: 20 February 2024*