

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA pursuant to Art. 13 of EU Reg. 679/2016**

### **a) Ownership and Purposes of Data Processing**

With this document, Italtrepreziosi spa intends to provide adequate information on the processing of personal data implemented as part of the company's complaint management system. Complaints will be handled in accordance with the "Complaint/Whistleblowing Policy" adopted by the companies and made available on their respective websites.

Personal data collected by Italtrepreziosi S.p.A., based in Arezzo, loc. San Zeno, Strada A n. 32, as data controller, are collected, processed and stored, in accordance with the provisions of Legislative Decree no. 196/2003 and EU Regulation no. 679/2016, for the following purposes:

- Execution of whistleblowing legislation, collection of reports and complaints covered by the legislation;
- personal data of the reporting subject and data of the reporting subject and other categories of data subjects, such as persons involved in and/or connected to the reporting process and/or the reported facts.

### **b) Object of Data Processing**

The data subject to processing may include common personal data (e.g. personal details, contact details, data relating to the work activity of the data subject, other data contained in the report and/or documentation attached or collected during the report management process, etc.) and, to the extent strictly necessary for the purposes of processing, personal data belonging to special categories referred to in Article 9 GDPR (e.g. data relating to health, trade union membership, data relating to the work activity of the data subject, etc.) and, to the extent strictly necessary to pursue the purpose of the processing, personal data belonging to special categories referred to in Article 9 of the GDPR (e.g. data relating to health, trade union membership, data disclosing racial origin, political opinions, religious or philosophical beliefs of the data subject, etc.), data relating to criminal convictions and offences referred to in Article 10 of the GDPR, acts or facts that could constitute a report of an offence or crime.

### **c) Data Processing modalities**

The processing of the data will always be based on the principles of correctness, lawfulness and transparency and the protection of the confidentiality and rights of the data controller, in such a way as to guarantee security and confidentiality, in accordance with the aforementioned legislation. Personal data will be processed for the purpose of handling the report and taking the consequent measures in compliance with legal or regulatory obligations on whistleblowing.

Personal data will be processed by paper or computer, in such a way as to guarantee their security and confidentiality and to prevent unauthorised persons, by means of the necessary security, technical and organisational measures, from tracing the identity of the whistleblower, in compliance with the applicable legal provisions and the Whistleblowing Procedure. Complaints will only be handled by authorised personnel and, if requested, the data controller will always guarantee the anonymity of the report.

#### **d) Legal basis for Data Processing**

The processing of the Data Subject's personal data is represented by the need to comply with the obligations imposed by the whistleblowing legislation and will be carried out on the basis of one or more of the following conditions of legitimacy provided for by the said legislation:

- consent of the data subject;
- the need to execute requests for the provision of a service by the data subject;
- to the extent proportionate and necessary, the legitimate interest of the Data Controller, as in the case of processing for the above-mentioned purposes.

#### **e) Data transfer, profiling and retention**

The personal data collected will not be disseminated and/or communicated without the express consent of the data subject. The personal data collected will be kept for the period of time necessary to achieve the purposes of the processing. The Data Controller may also be obliged to keep personal data for a longer period, in compliance with a legal obligation, or to keep it on the basis of its legitimate interest for the possible management of ongoing litigation or pre-litigation.

#### **g) Rights of Data Subjects**

Data subjects may at any time request information on the data collected, they may ask to know the origin of the data, they may request its modification and rectification, and they may request its deletion by writing an e-mail to [gdpr@italpreziosi.it](mailto:gdpr@italpreziosi.it) or by post to the company's registered office, provided that such deletion is not contrary to legal requirements.

Data subjects may also at any time revoke any consent they may have given for information and marketing activities carried out by Italtreziosi towards them, or in any case for all those activities that do not involve the processing of data as compulsory by law or necessary for the performance of the contract.

#### **h) Right to complain to the Control Authority**

If the data subject considers that the processing concerning him or her violates the provisions of the Data Protection Regulation, he or she has the right to lodge a complaint with the Supervisory Authorities, following the procedures and indications published on the relevant websites.