

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Pursuant to art. 13 and 14 of EU Regulation 2016/679

THE DATA CONTROLLER.

The Data Controller is **FRASCOLD S.p.A.** - Via Barbara Melzi 105 - 20027 Rescaldina (Mi), Tel. **+39.0331.742201** - e-mail: frascold@frascold.it

PLACE OF DATA PROCESSING.

The related processing takes place in Italy and as a rule the Personal Data are not transferred or disseminated to third countries.

PURPOSE OF DATA PROCESSING.

The personal data you provide are used for the sole purpose of managing the Whistleblowing report you have made and the subsequent investigation

CATEGORIES OF DATA SUBJECTS AND PERSONAL DATA PROCESSED

The personal data that may be processed by the Data Controller relate to the following subjects:

- employees, collaborators, interns, volunteers
- natural persons, employees/collaborators of customers / suppliers
- Freelancers, Consultants
- self-employed workers who carry out their service in the Company
- facilitators, i.e. those who assist "a reporting person in the reporting process in a work context and whose assistance must be confidential" and third parties connected with the reporting persons, such as colleagues or family members, as well as legal entities related to the whistleblower.

(hereinafter, all the "Data Subjects" **and individually the "Data Subject"**).

Depending on the Data Subjects, the processing may concern the following personal data, if reported/indicated:

- name, surname, gender, date and place of birth, nationality, tax code, e-mail address, telephone number;
- your current job position (title, position and company name of the company you work for);
- any other information in your report (including voice communication where provided for by the platform and/or activated as an optional service)
- any other information collected or processed in the course of conducting the investigation

LEGAL BASIS OF THE PROCESSING

The processing is necessary to comply with a legal obligation, deriving from Legislative Decree 24/2023, to which the data controller is subject [GDPR Art 6.1 lett. b)]

RETENTION TIMES

Without prejudice to your right to object to the processing of your personal data and/or to request its erasure, the Data Controller will retain your personal data only for as long as is strictly necessary to achieve the purpose for which it was collected or to comply with legal or regulatory requirements.

Internal and external reports and related documentation are kept for the time 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, in compliance with the confidentiality obligations set out in European and national legislation on the protection of personal data.

RECIPIENTS OF PERSONAL DATA.

For the purposes set out above and in compliance with the principles of necessity, relevance and non-excess, the following may have access to your Personal Data:

- external parties authorised to manage the evaluation process of the reports;
- internal subjects authorized to manage the subsequent phases of investigation;
- companies, organizations, persons who provide the Data Controller with IT services or who carry out activities connected, instrumental or supportive to the one covered by the information;
- external parties in compliance with legal obligations.

The updated list of any External Data Processors is available by contacting the Data Controller.

PROCESSING METHODS.

Personal Data is processed both by automated and manual means. All the means used for the processing are suitable to guarantee the security and confidentiality of the Personal Data and will be processed exclusively by persons authorized and specifically instructed to do so.

RIGHTS OF THE DATA SUBJECT.

The data subject has the right, if the conditions are met, to exercise the rights provided for in Articles 13 et seq. of the GDPR. In particular, the interested party may request:

- Access to your Personal Data, (and/or a copy of such Personal Data), as well as further information about the ongoing processing of your Personal Data;
- Rectification or updating of your Personal Data;
- The deletion of your personal data;
- The restriction of the processing of your personal data;
- Data portability, i.e. to obtain a copy of your personal data in a structured, commonly used and machine-readable format or to request its transmission to another Data Controller;

You also have the right to: object to the processing of your personal data; to revoke their consent to the processing at any time, where required; not to be subject to a decision based solely on automated processing, including profiling that produces legal effects concerning him or her or similarly significantly affects him/her, to lodge a complaint pursuant to art. 77 of the GDPR to the competent Authority.

CONTACT DETAILS OF THE DATA CONTROLLER.

The Data Controller can be contacted via:

- E-mail: frascold@frascold.it
- Ordinary mail: - Via Barbara Melzi 105 – 20027 Rescaldina (Mi)