

INFORMATION NOTICE “REPORTING PERSONS AND FACILITATORS”

Data Controller

The Data Controller is Itap S.p.A., with registered office in Lumezzane (BS) – 25065, Via Ruca, no. 19/21, Tax Code: 00452940174, VAT No.: 00563960988, Tel. +39 030 8927011.

Categories of Personal Data Processed

The categories of personal data processed relating to the Reporting Person and, where applicable, the facilitator, are as follows:

- identifying personal data;
- contact personal data;
- common or special categories of personal data freely provided within the report.

Purposes, Legal Bases and Retention Period

The processing of personal data is necessary in order to:

1. allow the Reporting Person to submit a report relating to one of the violations provided for by Legislative Decree No. 24/2023;
2. follow up on the report and, in particular, assess the existence of the reported facts, the outcome of the investigations and any measures adopted;
3. inform the Reporting Person of the follow-up given or intended to be given to the report;
4. inform the Reporting Person of the reasons why it is necessary to disclose confidential data and/or the reasons why it is essential, also for the purposes of the defence of the person concerned, to disclose the identity of the Reporting Person;
5. disclose, subject to the Reporting Person’s consent, their personal data for the proper management of the report.

In relation to the purposes described above:

- the legal basis for purposes 1 to 4 is Article 6(1)(c), as the processing is necessary for compliance with a legal obligation to which the Data Controller is subject;
- the legal basis for purpose 5 is Article 6(1)(a), as the processing is based on the data subject’s consent.

Personal data shall be retained 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.

Consequences of Failure to Provide Data

The provision of personal data indicated as mandatory is necessary in order to achieve the stated purposes: failure to provide such data makes it impossible to carry out the processing. The provision of other personal data is optional.

Categories of Recipients of Personal Data and Scope of Communication or Disclosure

Within the limits of the obligations, tasks or purposes indicated above:

- personal data shall be processed exclusively by persons authorised to process data pursuant to Article 29 GDPR, for the purposes indicated above, as well as by third parties appointed as Data Processors pursuant to Article 28 GDPR, in compliance with applicable law, including with regard to security measures for the protection and safeguarding of such data;
- the data shall not be disclosed in any way, except with the consent of the data subject;
- the data shall not be transferred outside the territory of the European Union.

The list of Data Processors may be requested from the Data Controller.

The Data Controller may communicate personal data to third parties acting as independent data controllers solely for the purpose of complying with legal obligations.

Data Subject's Rights

The data subject to whom the personal data relate has the right to request and obtain, at any time, from the Data Controller, access (Art. 15 EU Regulation), rectification (Art. 16 EU Regulation) and erasure (right to be forgotten) (Art. 17 EU Regulation) of their personal data. The data subject also has the right to restriction of processing (Art. 18 EU Regulation), the right to data portability (Art. 20 EU Regulation), as well as the right to object, on legitimate grounds, to the processing (Art. 21 EU Regulation).

In any case, the data subject has the right to lodge a complaint with the Supervisory Authority, as provided for by Article 77 EU Regulation, or to seek judicial remedies pursuant to Article 79 EU Regulation, where they consider that the processing of personal data relating to them is carried out in breach of the EU Regulation.

Methods for Exercising Rights

The data subject may exercise the rights identified above at any time by sending, to the attention of the Internal Privacy Officer: an email to paghe@itap.it or a registered letter with return receipt to Itap S.p.A., Lumezzane (BS) – 25065, Via Ruca, no. 19/21.