

## **STATEMENT ON PROCESSING OF PERSONAL DATA FOR PERSONS INVOLVED IN REPORTS OF WRONGDOING**

(Article 14 Reg (EU) 2016/679 — GDPR)

### **Controller**

The Controller is Arneg S.p.A. - Via Venezia, 58 - 35010 Campo San Martino (PD).

Tel. +39 049 9699333

email: [privacy@arneg.it](mailto:privacy@arneg.it)

### **Personal data processed, purposes of and legal basis for processing**

The Controller processes your personal data supplied by a third party when a report is submitted (through the dedicated channel) in connection with the following alleged unlawful conduct:

- administrative, accounting, civil or criminal wrongdoing;
- breaches of Union law across a very wide range of areas mentioned expressly in the Annex to Directive (EU) 2019/1937 (including: public procurement, financial services, product and transport safety, environment, food, public health, privacy, network security, competition).

Your involvement could be of whatever nature, that is to say acting as facilitator or as alleged perpetrator of the reported breach.

Processing of the data in question is required in order to fulfil the legal obligations imposed on the Data Controller by Legislative Decree n° 24 of 2023 (article 6, para 1, letter (c) of GDPR) and with regard to conducting the necessary investigative activities aimed at verifying the facts of the matter reported and the adoption of the consequent measures.

Your personal data will be processed only if pertinent to the subject of the report.

### **Methods of processing**

Data is processed via computerised procedures, or manually, by a Whistleblowing Officer who is specifically trained and authorised by the Data Controller and moreover bound by duties of confidentiality and data management in accordance with such security measures as are deemed appropriate.

## Recipients of personal data

The data collected will not be disseminated. If necessary for the fulfilment of the purpose described above, data collected and processed by the Whistleblowing Officer may be passed on to other staff appointed by the Data Controller. In addition, where appropriate, data collected in connection with a report will be forwarded to the competent authorities.

## Retention of personal data

Reports and the documentation of their investigation are kept for as long as is necessary for the report to be processed and in any event no longer than five years from the date on which the final outcome of the verification procedure is communicated, in accordance with confidentiality obligations.

If the report has importance for the purposes of legal proceedings, it will be retained for as long as may be necessary to enable the exercising of rights through the law courts.

## Rights of data subjects

As a data subject, you are entitled to exercise the following rights:

- to access your personal data and obtain information concerning the purpose of processing, the category of personal data, the recipients to whom your data have been or will be disclosed, the period for which the data will be stored, the origin of the data if not provided directly by the Data Subject, the existence of any automatic profiling system (GDPR article 15);
- to rectify data communicated previously (GDPR article 16);
- to obtain the erasure of personal data (GDPR article 17);
- to restrict the processing of the aforementioned data (GDPR article 18).

To exercise their rights, Data Subjects must submit a request to the Controller, using the contacts indicated at the top of this statement.

As envisaged under GDPR article 14, para 5, letter (b), in order to safeguard the purposes of investigative activities, the data subject with whom the report is associated may not be made aware immediately of the processing of his/her data by the Data Controller, at least while there is any risk that the steps of verifying the merits of the report effectively or of gathering the necessary evidence could be rendered impossible or seriously impaired. Any such delay is assessed on a case-by-case basis by those entrusted with the investigative activities, taking due account of the need for protection of evidence and of the broader interests at stake.

Should Data Subjects consider that the processing of their data is in breach of Regulation (EU) 2016/679 — GDPR — they are entitled to lodge a complaint with the Data Protection Authority via the contacts available on the website <https://www.garanteprivacy.it/>.

In any event, the Data Controller cautions that the above noted rights cannot be exercised by submitting a request to the Controller or by lodging a complaint pursuant to Article 77 of the GDPR if the exercise of these rights could effectively and materially prejudice confidentiality regarding the identity of the person reporting breaches of which he/she has become aware by reason of his/her employment relationship or job description (Article 2-undecies of Legislative Decree 196/2003 et seq.)

Statement on processing of personal data for persons involved in reports of wrongdoing