



# VISOTTICA

GROUP

## **WHISTLEBLOWING PRIVACY NOTICE CONCERNING THE PROCESSING OF PERSONAL DATA OF THE PERSONS WHO REPORT VIOLATIONS OF EUROPEAN UNION OR NATIONAL LAWS, PERSONS INVOLVED, PERSONS MENTIONED, AND FACILITATORS**

**Visottica Industrie S.p.A.**, identified with tax ID 01531210308 and VAT Reg. No. 03486160264, with its registered office in Susegana (TV), via Vecchia Trevigiana n. 11, and **Ideal S.r.l.** with tax ID 00843530254 and VAT Reg. No. P.IVA 00843530254, based Via A. Redusio, n. 6/8/10, 32038 Quero Vas, Belluno, as joint data controllers in the processing of personal data (hereinafter "Joint Controllers"), supply this privacy notice to the whistleblower, as well as to any persons involved in the reporting, any persons mentioned in the reporting, and any facilitators pursuant to the European and Italian regulations governing the protection of personal data.

### **Purposes and Legal Basis of the Processing**

The Joint Controllers process personal data for the purpose of conducting the preliminary investigations required to confirm that the reporting is well-founded and to adopt any subsequent measures. Consent is not required as the processing of data is necessary to fulfil the legal obligations imposed on the Joint Controllers pursuant to the provisions of Italian Legislative Decree No. 24 of 10 March 2023.

### **Categories of Data and Data Sources**

The Joint Controllers may process general data (such as first name, family name, role, etc.), sensitive data (such as data concerning health, trade union membership, etc.), and/or data concerning criminal offenses, criminal convictions or security measures: all of these data may be collected directly from the person they refer to (hereinafter, the "Data Subject") and/or from third parties (e.g., when the whistleblower provides data concerning the reported person and/or other persons mentioned in the reporting and/or the facilitator, as well as during the initial investigation, when further information/documents are acquired *ex officio* from any Joint Controllers' organizations).

### **Data Retention Period**

The data collected are stored for the time necessary to process the reporting, as well as to fulfil any related administrative procedures or filed lawsuits for a period of up to 5 years from the date on which the final outcome of the reporting procedure has been communicated.

### **Nature of the Provision of Data and Consequences of Refusal**

Personal data are provided on a voluntary basis; however, their provision is necessary to the handling of reports and of any related activities. As a consequence, any refusal prevents such actions from being taken.

### **Categories of Recipients**

During the handling of reports, personal data may be processed by internal personnel who have been specifically authorized for the purposes indicated, as well as by external service providers or other parties (e.g., providers of platform services for the handling of reports), who shall act as data processors on behalf of the Joint Controllers. If prerequisites are met, personal data may be transmitted to third parties to whom communication is required by law (e.g., the Judicial Authority, the National Anti-Corruption Authority, etc.). In no event shall personal data be disseminated or disclosed to other parties.

### **Transfers of Personal Data to a Third Country and/or International Organization**

Personal data shall not be transferred to third countries outside of Europe or to international organizations.

### **Rights of Data Subjects**

Data Subjects have the right to access their personal data, have them updated (or rectified, in case of inaccuracies) and erased, as well as restrict processing, if the applicable requirements are met and specifically within the limits of the provisions of Article 2-*undecies* of Italian Legislative Decree no. 196/2003. Finally, Data Subjects have the right to know the essential content of the agreement that the Joint Controllers have entered into for the processing of personal data.

In order to exercise their rights, Data Subjects can use the form available at <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and submit it to the person in charge of managing the reporting, by contacting said person through the same channel used for the reporting, or send an e-mail to Visottica at the address [privacy@visotticacomotec.com](mailto:privacy@visotticacomotec.com). Moreover, Data Subjects have the right to lodge a complaint with the competent authority, i.e. the Italian data protection authority (Garante per la protezione dei dati personali) ([www.garanteprivacy.it](http://www.garanteprivacy.it)).