

INFORMATION ON THE PROCESSING OF PERSONAL DATA pursuant to Articles 13 and 14 of EU Regulation 2016/679

DATA CONTROLLER

The Data Controller is FRILVAM SpA, located at Via Merlata 29, 20014 Nerviano (Milan), Italy.

Phone: +39 0331-587171

Email: frilvam@frilvam.com

LOCATION OF DATA PROCESSING

The data processing takes place in Italy, and as a general rule, personal data is not transferred or distributed to third countries.

PURPOSE OF DATA PROCESSING

The personal data provided will be used solely for the purpose of managing the whistleblowing report made by you and the subsequent investigation.

CATEGORIES OF DATA SUBJECTS AND PERSONAL DATA PROCESSED

The personal data that may be processed by the Data Controller relates to the following individuals:

- Employees, collaborators, interns, volunteers
- Individuals employed/collaborating with clients/suppliers
- Freelancers, consultants
- Independent workers providing services to the company
- Facilitators (individuals assisting a whistleblower in the reporting process within the work context, whose assistance must be kept confidential), and third parties connected to the whistleblower, such as colleagues or family members, as well as legal entities connected to the whistleblower.

From now on, all these individuals will be referred to as "**Data Subjects**" or individually as "**Data Subject**."

The personal data that may be processed includes:

- Name, surname, gender, date and place of birth, nationality, tax code, email address, phone number
- Current job position (title, role, and company details)
- Any additional information included in your report (including voice communication if provided via the platform or any optional services)
- Any other information collected or processed during the investigation process

LEGAL BASIS FOR DATA PROCESSING

The data processing is necessary to fulfill a legal obligation under Legislative Decree 24/2023, to which the Data Controller is subject (GDPR Art. 6.1(b)).

DATA RETENTION PERIOD

Without prejudice to your right to object to the processing of your personal data or request its deletion, the Data Controller will retain your personal data only for the time strictly necessary to achieve the purpose for which it was collected or to comply with legal or regulatory obligations.

Internal and external reports, along with related documentation, will be retained for the necessary duration of the investigation and, in any case, for no longer than 5 years from the date the final outcome of the reporting procedure is communicated, in compliance with confidentiality obligations under European and national data protection laws.

RECIPIENTS OF PERSONAL DATA

For the purposes outlined above and in accordance with the principles of necessity, relevance, and non-excess, your personal data may be accessed by:

- External parties authorized to manage the report evaluation process
- Internal parties authorized to handle subsequent investigation phases
- Companies, organizations, or individuals providing IT services or carrying out activities connected, instrumental, or supportive to the subject matter of the information
- External parties in compliance with legal obligations

An up-to-date list of potential external data processors is available upon request from the Data Controller.

METHODS OF DATA PROCESSING

Personal data is processed using both automated and manual tools. All processing methods are designed to ensure the security and confidentiality of personal data. Data will only be processed by authorized individuals who have been specifically trained for this purpose.

RIGHTS OF THE DATA SUBJECT

The Data Subject has the right to exercise the rights provided under Articles 13 and following of the GDPR. In particular, the Data Subject may request:

- Access to their personal data (and/or a copy of such data), as well as further information on the ongoing processing
- Rectification or updating of their personal data
- Deletion of their personal data
- Restriction of the processing of their personal data
- Data portability, i.e., obtaining their personal data in a structured, commonly used, and machine-readable format, or requesting its transmission to another Data Controller

Additionally, the Data Subject has the right to:

- Object to the processing of their personal data
- Withdraw consent for processing at any time, where applicable
- Not be subject to decisions based solely on automated processing, including profiling, which produce legal effects or significantly affect them in a similar manner
- Lodge a complaint with the competent authority, pursuant to Article 77 of the GDPR

CONTACT DETAILS OF THE DATA CONTROLLER

The Data Controller can be contacted via:

- Email: frilvam@frilvam.com
- Postal Address: Via Merlata 29, 20014 Nerviano (MI), Italy