

Information on the processing of personal data pursuant to articles. 13-14 EU Reg. 2016/679

#### **Interested Parties: subjects who report crimes**

PLURITEC SRL in its capacity as Data Controller of your personal data, pursuant to and for the purposes of EU Regulation 2016/679 hereinafter 'GDPR', hereby informs you that the aforementioned legislation provides for the protection of interested parties with respect to processing of personal data and that such processing will be based on the principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned legislation and the confidentiality obligations set out therein and in compliance with the provisions of Legislative Decree no. 24 of 10 March 2023 regarding Whistleblowing.

#### **Legal basis of processing:**

Personal data processed in the "whistleblowing" procedure of the reporting party and related third parties:

- common data: name, surname, job role etc., defense briefs, content of the report (b.g. legal obligation art. 6 par. 1 letter c – consent of the interested party art. 6 par. 1 letter a);
- particular data (i.e. religious or philosophical beliefs or trade union membership or relating to health (b.g. specific obligations of the Data Controller in matters of labor law art. 9 par. 2, letter b - ascertain, exercise or defend a right in judicial seat art. 9 par. 2 letter f GDPR);
- personal data relating to criminal convictions and crimes (b.g. legal obligation art. 6 par. 1 letter c - art. 10 GDPR)

**Purpose of processing:** your personal data and that of the subjects connected to the report will be processed for the following purposes related to the whistleblowing procedure:

- Compulsory obligations by law, in accordance with the provisions of Law 30 November 2017, n. 179 and subsequent amendments (b.g. legal obligation)
- Acquisition and management of reports of illicit conduct of which one has become aware due to one's employment, service or supply relationship (b.g. legal obligation)
- Investigation activities aimed at verifying the validity of the reported fact and the adoption of consequent measures (b.g. legal obligation)
- Communication of the report, as well as any personal identifying data to competent and authorized third parties or competent authorities (i.e. consent of the interested party)
- Disclosure of the identity of the whistleblower for the purposes of defense of the accused (i.e. consent of the interested party)
- Management of the report via registered telephone line or other voice messaging system, as well as in order to document the report in a direct meeting (i.e. consent of the interested party)
- Defensive investigation activity to search for and identify evidence to ascertain, exercise or defend a right in court (i.e. legitimate interest)

The processing of functional data for the fulfillment of these obligations is necessary for correct management of the report, their provision is mandatory to implement the purposes indicated above. The Data Controller also informs that any non-communication, or incorrect communication, of any of the mandatory information may make it impossible for the Data Controller to guarantee the adequacy of the processing itself.

The processing of personal data based on art. 6, paragraph 1, letter a) is not mandatory, their provision is optional and therefore you have the right to withdraw consent at any time without prejudice to the lawfulness of the processing. Failure to consent makes it impossible for the Data Controller to follow up the disciplinary procedure on the oral report and to document the report in the direct meeting.

**Processing methods:** your personal data may be processed in the following ways:

- processing by means of electronic calculators,
- manual processing using paper archives.

All processing takes place in compliance with the methods set out in the articles. 6, 32 of the GDPR and through the adoption of the appropriate security measures envisaged.

**Communication:** your data may be communicated if necessary for the performance of the requested services, to competent and duly appointed subjects for the performance of the services necessary for correct management of the report (by way of example and not limited to: manager of the report , company responsible for managing the platform); external consultants involved in the preliminary investigation activity (e.g. law firms); following the outcome of any investigation to the competent authorities for notifying the proceedings (judicial authority, Court of Auditors, ANAC) with a guarantee of protection of the rights of the interested party.

Your data will be processed only by personnel expressly authorized by the Data Controller.

**Dissemination:** Your personal data will not be disclosed in any way.

**Conservation Period:** We inform you that, in compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 of the GDPR, the retention period of your personal data is:

- the reports that have been assessed as not relevant and archived on the basis of the provisions of the company procedure will be canceled 60 days after completion of the relevant checks;
- all other reports and the documentation relating to their management will be kept for no longer than 5 years from the date of communication of the final outcome of the reporting procedure.

### **Rights of the interested party**

Pursuant to the articles. 15 and following of the GDPR, without prejudice to any limitations deriving from the mandatory provisions, or pursuant to art. 2-undecies of Legislative Decree 101/2018, it is expected that:

1. The interested party has the right to obtain confirmation of the existence or otherwise of personal data concerning him, even if not yet registered, and their communication in an intelligible form.
2. The interested party has the right to obtain the indication:
  - a. the origin of the personal data;
  - b. of the purposes and methods of processing
  - c. of the logic applied in case of processing carried out with the aid of electronic instruments;
  - d. the identification details of the owner, managers and representative designated pursuant to article 5, paragraph 2;
  - e. of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them as designated representatives in the territory of the State, managers or agents.
3. The interested party has the right to obtain:
  - a. updating, rectification or, when interested, integration of data;
  - b. the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed;
  - c. the certification that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment proves impossible or involves the use of means that are manifestly disproportionate to the protected right;
  - d. data portability.
4. The interested party has the right to object, in whole or in part:
  - a. for legitimate reasons to the processing of personal data concerning him, even if pertinent to the purpose of the collection;
5. The interested party has the right to request the limitation of processing.

You can exercise your rights by sending an email [info@pluritec.org](mailto:info@pluritec.org) or by sending a written request to the addresses specified above.

Furthermore, if the interested party believes that the processing of their data is contrary to the legislation in force, they can lodge a complaint with the Supervisory Authority for the protection of personal data pursuant to art. 77 of Regulation 2016/679 or submit a report pursuant to art. 144 of Legislative Decree 101/2018.