

## **PRIVACY NOTICE**

### **concerning the processing of personal data of individuals involved in reports submitted via TrueSpeak.eu**

Pursuant to Article 13 of Legislative Decree No. 196/2003 of the Code on the protection of personal data (hereinafter also referred to as the “Privacy Code”) and pursuant to Article 13 of European Regulation No. 679/2016 (hereinafter also referred to as the “GDPR”), we provide you with this notice.

#### **The data controller**

The data controller is Bureau Plattner, with its registered office at Via Leonardo da Vinci, 12 – 39100 Bolzano, VAT No. 00547870212 (“the Firm”), email [bureau.plattner@bplm.it](mailto:bureau.plattner@bplm.it). This policy is addressed to “Whistleblowers” and, where applicable, to “Facilitators” (hereinafter both referred to as “**Data Subjects**”) within the whistleblowing system pursuant to Legislative Decree 24/2023, as amended.

#### **Place of data processing**

The related processing operations take place in Italy and there is no transfer or disclosure of data abroad or to countries outside the EU. No data is disclosed or disseminated, except for statistical purposes and, in any case, in an anonymous and/or aggregated form.

#### **Purposes of data processing**

The personal data of data subjects is processed for the following purposes:

- a) to follow up on the report, and in particular to assess the validity of the facts reported, the outcome of the investigations and any measures taken;
- b) to consult the data subject, including at their request, possibly also by way of a written procedure involving the collection of written comments and documents.

With regard to each of the purposes described above:

- the legal basis is Article 6(1)(c) of the GDPR, as the processing is necessary for compliance with a legal obligation to which the Data Controller is subject.

#### **Data processed**

The categories of data processed, relating to the data subjects, are as follows:

- personal identification and contact details of the person involved;
- personal data – whether general, special categories or relating to criminal convictions – concerning the person involved that has come to light during the reporting process;
- further personal data – whether general, special or relating to criminal convictions – shared by the person involved.

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## **Retention periods**

Personal data will be retained for the time necessary to process the report and, in any event, for no longer than 5 years from the date of notification of the final outcome of the reporting procedure.

## **Communication and disclosure of processing**

Personal data will be processed exclusively by employees and collaborators of the Data Controller, as well as by third parties appointed as data processors in accordance with Article 28 of the GDPR. In particular, given that whistleblowing reports are submitted via the TrueSpeak.eu software, access is also granted to the provider of the aforementioned application, who has been appointed for this purpose as a data processor in accordance with Article 28 of the GDPR.

Personal data will not be disclosed in any way, unless the data subject has given their consent. The Data Controller may disclose the data subject's personal data to third parties, who are independent data controllers, subject to the data subject's consent and solely for the purpose of processing the report.

## **Methods of processing**

Personal data is processed using both electronic and paper-based means in the manner necessary to achieve the purposes set out above. Data processing is carried out using procedures designed to safeguard confidentiality and will consist of the collection, recording, organisation, storage, retrieval, processing, modification, selection, extraction, comparison, use, interconnection, blocking, disclosure, deletion and destruction of such data, including the combination of two or more of the aforementioned activities.

Specific security measures are in place to prevent data loss, unlawful or improper use, and unauthorised access.

## **Rights of data subjects**

Under certain conditions, you have the right to exercise the rights provided for in Articles 7, 8, 9 and 10 of the Privacy Code and Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR and, in particular, to ask us:

- access to your personal data,
- a copy of the personal data you have provided to us (so-called 'data portability'),
- the rectification of the data in our possession,
- Deletion of any data for which we no longer have a legal basis for processing,
- the right to object to processing where provided for by applicable legislation
- the withdrawal of your consent, where the processing is based on consent;
- restriction of the way in which we process your personal data, within the limits set out in data protection legislation.

The exercise of these rights is subject to certain exceptions designed to safeguard the public interest (for example, the prevention or detection of crime) and our own interests (for example, the maintenance of professional secrecy).

Should you exercise any of the aforementioned rights, it will be our responsibility to verify that you are entitled to do so, and we will, as a rule, respond within one month.

Anyone with concerns regarding compliance with Bureau Plattner's privacy policy, its application, the accuracy of their personal data or the use of the information collected may contact us by email at: [bureau.plattner@bplm.it](mailto:bureau.plattner@bplm.it).

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Any data subject may lodge a complaint or report, in accordance with Article 77 of the GDPR, with the data protection authority, using the relevant contact details:

Italian Data Protection Authority – Piazza di Monte Citorio 121 – 00186 ROME  
- Fax: (+39) 06 69677 3785 - Telephone: (+39) 06 696771 - Email: [garante@gpdp.it](mailto:garante@gpdp.it) -  
Certified email: [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it)