

**Privacy Policy for the Processing of Personal Data
(pursuant to Article 13 of the GDPR)**

Subject: Information for data subjects pursuant to the combined provisions of Article 13 of EU Regulation 679/2016 concerning the protection of individuals with regard to the processing of personal data and Article 13 of Legislative Decree no. 24 of March 10, 2023, concerning the protection of persons reporting violations of Union law and providing provisions regarding the protection of persons reporting violations of national legislative provisions (Whistleblowing).

Dear Mr./Ms.,

in your capacity as a reporter/facilitator, this Data Controller informs you about the specific purposes and methods of the processing of collected personal data, their scope of communication and dissemination, as well as the nature of their provision.

1. Preliminary Information pursuant to Article 13/679/2016 §1:

a) **Identity and contact details of the DCPD**

The Data Controller for the processing of personal data (DCPPD) is SAIVER Srl, reachable during office hours at phone number +39 039 282831 and email address: info@saiver.com

b) **Purpose and Legal Basis of the Processing**

The purposes are closely related to the reporting activities you have carried out or the public disclosure of information about violations acquired within the scope of your work context.

The legal basis consists of processing necessary for compliance with a legal obligation or the provisions of Legislative Decree 24/2023 to which the data controller is subject.

Personal data that is manifestly not useful for the processing of a specific report is not collected, or if collected accidentally, is immediately deleted.

c) **Methods of Processing Personal Data**

Your personal data is processed both by electronic/telematic means and manually, in whole or in part, for the time necessary as indicated in point 2., letter a) of this document.

d) **Security measures**

Your personal data is protected through the adoption of adequate technical and organizational measures that this controller has undertaken in accordance with the provisions of Article 24 of EU Regulation 2016/679 (GDPR).

e) **Recipients or Categories of Recipients of Personal Data (Article 4/24/2023 c. 2, 14/24/2023 c. 1, 2 e 3, ANAC guidelines)**

Recipients of your personal data may include:

☐ authorized persons who, within the internal office of the Data Controller/Processor, are involved in the management of the reporting channel.

If reports are made through recorded or unrecorded telephone lines or orally, your personal data may be processed by the aforementioned agents with your consent or your signature on the transcription content;

☐ the Supervisory Body pursuant to Legislative Decree 231/01, if appointed.;

☐ individuals involved in the proceeding initiated against the person involved following the outcome of the investigation into the report that concerned them.

The recipients of the communication initiating the proceeding are:

- direct recipients, i.e., those against whom the final act is intended to have effects;
- necessary interveners, i.e., individuals who, by law, must intervene in the proceeding;
- potential interested parties, i.e., subjects other than direct recipients who may suffer harm from the adoption of the final [provision](#), provided they are identified or easily identifiable.

f) Transfer of Data to Third Countries or International Organizations

Not applicable.

Should the transfer of personal data to third countries or international organizations become necessary, the Controller guarantees its lawfulness by conforming, as needed, to the provisions of Articles 44 to 50 of EU Regulation 2016/679.

2. Additional Information pursuant to Article 13/679/2016 §2:

a) Retention Period of Personal Data (Article 14/24/2023 c.1)

The retention period of your personal data is correlated with the retention period of documentation related to reports.

Internal and external reports, and the related documentation, are kept for the time necessary for the processing of the report and in any case, not exceeding five years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations under Article 12 of Legislative Decree 24/23 and the principle of limitation of storage under Regulation (EU) 2016/679.

b) Right of Access, Rectification, or Erasure, and Restriction of Processing of Personal Data (Article 13/24/2023 c. 3)

The data subject's rights under Articles 15 to 22 of EU Regulation 2016/679 cannot be exercised by requesting the data controller or by filing a complaint under Article 77 of the Regulation if the exercise of such rights may result in an actual and concrete prejudice, among other things, to the confidentiality of the identity of the person reporting violations that came to their knowledge due to their employment relationship or functions performed, under Legislative Decree 24/2023, in the banking sector under Articles 52-bis and 52-ter of Legislative Decree 385/93 (Consolidated Banking Act), and in the field of Financial Intermediation under Articles 4-undecies and 4-duodecies of Legislative Decree February 24, 1998, no. 58.

c) Communication of Personal Data

Your personal data is in the possession of this Controller in accordance with the provisions of Legislative Decree 24/2023 on Whistleblowing, and therefore, their communication is not necessary.