

Information for those concerned with the Whistleblowing procedure on the processing of personal data
Pursuant to Articles 13 and 14 of the EU Regulation No. 679/2016 (GDPR) and Legislative Decree No. 24/2023

 DATA CONTROLLER	SANDENVENDO EUROPE S.P.A. registered office in Regione Cavallino, no. 2 - 15030 Coniolo (AL) e-mail address: info@sandenvendo.it								
 WHY THIS INFORMATION IS GIVEN	SandenVendo Europe S.p.A. wishes to inform you about the processing of your personal data and, if applicable, the personal data of persons involved in or named in the whistleblowing and facilitators in connection with the Whistleblowing procedure.								
 WHICH DATA WE PROCESS (COMMON DATA AND SPECIAL DATA)	The personal data processed are: <ul style="list-style-type: none"> - identifying details data: name, surname, date and place of birth. - contact data: telephone number, e-mail address. - any special data included in the report. - further data voluntarily provided by the person concerned in the report. 								
 WHY DO WE PROCESS YOUR DATA? (PURPOSES OF THE PROCESSING AND LEGAL BASIS)									
<table border="1"> <thead> <tr> <th style="text-align: center;">Purposes of the processing:</th> <th style="text-align: center;">Legal basis:</th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;"> 1. Mandatory fulfilments required by law or Community legislation </td><td> Legal obligation <i>(art.6 (1) (c) of GDPR)</i> <i>(art.9 (2) (b) of GDPR, in case of processing of special categories of personal data)</i> <i>(Legislative Decree No. 24/2023)</i> </td></tr> <tr> <td style="vertical-align: top;"> 2. Handling of reports pursuant to Legislative Decree No. 24/2023 </td><td> Legal obligation <i>(art.6 (1) (c) of GDPR)</i> <i>(art.9 (2) (b) of GDPR, in case of processing of special categories of personal data)</i> <i>(Legislative Decree No. 24/2023)</i> </td></tr> <tr> <td style="vertical-align: top;"> 3. Possible legal dispute management in court </td><td> Overriding legitimate interest <i>(art. 6 (1) (f) of GDPR)</i> </td></tr> </tbody> </table>		Purposes of the processing:	Legal basis:	1. Mandatory fulfilments required by law or Community legislation	Legal obligation <i>(art.6 (1) (c) of GDPR)</i> <i>(art.9 (2) (b) of GDPR, in case of processing of special categories of personal data)</i> <i>(Legislative Decree No. 24/2023)</i>	2. Handling of reports pursuant to Legislative Decree No. 24/2023	Legal obligation <i>(art.6 (1) (c) of GDPR)</i> <i>(art.9 (2) (b) of GDPR, in case of processing of special categories of personal data)</i> <i>(Legislative Decree No. 24/2023)</i>	3. Possible legal dispute management in court	Overriding legitimate interest <i>(art. 6 (1) (f) of GDPR)</i>
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 METHOD OF PROCESSING AND DATA RETENTION	The data will be processed with the aid of electronic tools. The data will be retained in accordance with the terms set out in Article 14 of Legislative Decree No. 24/2023, i.e. for as long as necessary for the processing of the report and in any case no longer than five years from the date of the communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set out in Article 12 of this Decree and the principle set out in Article 5(1)(e) of the GDPR and Article 3(1)(e) of Legislative Decree No. 51 of 2018.								

 RECIPIENTS OF THE DATA	<p>Personal data may be disclosed to: <i>i</i>) consultant and freelance professionals; <i>ii</i>) subjects delegated to technical or IT maintenance on the platform used for reporting; <i>iii</i>) public and/or private subjects to whom the communication of data is mandatory for legal obligations or functional to the relationship; <i>iv</i>) person in charge delegated by SandenVendo Europe S.p.A. to processing of personal data.</p>
 RIGHTS OF DATA SUBJECT	<p>You can exercise your rights under Articles 15 and 22 of GDPR at any time, namely:</p> <ul style="list-style-type: none"> • the right to know whether your personal data is being processed and, if so, to receive a copy of it (<i>right of access</i>). • the right to correct inaccurate or outdated personal data (<i>right of rectification</i>). • if possible, the right to have your personal data erased (<i>right to erasure</i>). • if possible, the right to restrict the processing of your personal data (<i>right to restrict of processing</i>). • the right to receive and share your personal data with another data controller in a commonly used format (<i>right to data portability</i>). • if possible, the right to object to data processing based on legitimate interest (<i>right to object</i>). <p>Furthermore, the data subject can lodge a complaint with the Supervisory Authority, if he or she believes that the processing that concerns him or she violates the law in force (Article 77 of the GDPR).</p> <p>To exercise your rights, please contact us at the following e-mail address: info@sandenvendo.it.</p> <p>The rights referred to in Articles 15 to 22 of GDPR may not be exercised by request to the Data Controller or by complaint to the Supervisory Authority if the exercise of such rights may result in actual and concrete prejudice to the confidentiality of the identity of the data subject, pursuant to Article 2-undecies (1) (f) of Legislative Decree no. 196/2003, as amended by Legislative Decree no. 101/2018.</p>