

PRIVACY DISCLAIMER

relating to the processing of personal data of those submitting reports via My Whistleblowing

This disclaimer is provided Pursuant to art. 13 of the Legislative Decree. n° 196/2003 of the Code regarding protection of personal data (hereinafter also the "Privacy Code") and pursuant to art. 13 of the European Regulation n. 679/2016 (hereinafter also the "GDPR").

THE DATA CONTROLLER.

The data controller is CIEM S.p.A. with registered office in Cassino (FR), Via Cerro Tartari Fisc code and VAT ID no. IT01501750606 e-mail privacy@ciemgroup.com

PLACE OF DATA PROCESSING.

The related processing takes place in Italy and there is no transfer nor dissemination activity abroad or to non-EU countries. No data is communicated or disseminated, except for statistical survey purposes and in any case in an anonymous and/or aggregate manner.

PURPOSE OF DATA PROCESSING.

The provided personal data are used for the sole purpose of managing the submitted Whistleblowing report.

PROCESSED DATA

The personal processed data are exclusively:

- First name;
- Surname;
- Email address.

LEGAL PROCESSING BASIS

The legal basis on which the personal data are processed is given by the legal obligation deriving from the provisions of art. 6 of the Legislative Decree. n. 231 of 2001, as amended by Law no. 179 of 2017, containing "Provisions for the protection of those reporting crimes or irregularities that they have become aware of in the context of a public or private employment relationship".

STORAGE PERIOD

The provided personal data will be deleted within 1 year from their collection date.

WHOM WE SHARE THE COLLECTED DATA WITH

Employees in charge of investigating Whistleblowing reports and members of the Supervisory Body, pursuant to Legislative Decree 231/2001, may have access to your personal data. Furthermore, considering that Whistleblowing reports are forwarded via the My Whistleblowing software, the provider of the aforementioned application, appointed for this purpose as data controller pursuant to art. 28 of the GDPR, may also have access to your personal data. It is understood that, in line with the principle of protection of the whistleblower's confidentiality referred to in Law 179/2017, sharing of your personal data shall be limited to what is strictly necessary to guarantee your confidentiality.

PROCESSING METHODS.

Personal data is processed both with automated and manual tools and for the purposes indicated above. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

RIGHTS OF INTERESTED PARTIES.

Under certain conditions you have the right to exercise the rights provided for by the art. 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:

- to access your personal data;
- a copy of the personal data that you have provided (so-called portability);
- rectification of the data in our possession;
- deletion of any data for which we no longer have any legal basis for processing;
- opposition to processing where required by applicable law;
- revocation of your consent, in the event that the processing is based on consent;
- limitation of the way in which personal data is processed, within the limits established by the legislation for personal data protection.

Exercising these rights is subject to some exceptions aimed at safeguarding the public interest (for example the prevention or identification of crimes) and our interests (for example maintenance of professional secrecy). In the event that you exercise any of the aforementioned rights, it will be our responsibility to verify that you are entitled to do so, and we will usually respond within one month.

Anyone who has doubts regarding compliance with the privacy protection policy adopted by CIEM S.p.A., its application, the accuracy of their personal data or use of the information collected can contact us by e-mail at: privacy@ciemgroup.com. However, if you wish, you can forward your complaints or reports, pursuant to art. 77 of the GDPR, to the authority responsible for data protection, using the relevant contact details:

Guarantor for the protection of personal data - Piazza Venezia n. 11 - 00187 Rome - Fax: (+39) 06.69677.3785
- Telephone: (+39) 06.696771 - E-mail: protocollo@gpdp.it - Certified mail: protocollo@pec.gpdp.it.