

PRIVACY POLICY

(Art. 13-14 EU Data Protection Regulation no. 679 of 27 April 2016 "GDPR")

Dear Data Subject,

Pursuant to European Regulation 2016/679, we inform you that your data will be processed in accordance with the principles of "lawfulness, fairness and transparency" (art. 5(a)) and we provide you with the following information:

- Data Controller: **Rovatti A. & Figli Pompe S.p.a. Via Trento 22/24, 42042 Fabbrico (RE)**
- The Data Controller is responsible to you for the lawful and proper use of your personal data and may be contacted for any information or request regarding the processing operations listed below:

Management of whistleblowing reports		
Purpose of the processing and its legal basis	<u>Purpose</u>	<u>Legal basis</u>
	Handling of Reports made pursuant to Italian Legislative Decree no. 24/2023	<i>Legal obligation (Art. 6(c))</i>
	Protection of the company's integrity against alleged misconduct	<i>Legal obligation (Art. 6(c))</i>
Processing methods and automated decision-making	The data will be processed digitally. There will be no automated decision-making processes.	
Type of data processed	Personal data of the Whistleblower in the case of non-anonymous reports, as well as of any parties involved or mentioned in the Report, and Facilitators as defined by the Guidelines approved by Resolution 311 of 12 July 2023, such as: common information, e.g. personal data (name, surname, etc.), contact data (phone and/or mobile number, postal/email address, etc.) or special data (racial origin, religious belief, etc.).	
Categories of recipients	<i>For legal obligations or activities necessary for the performance of the assignment, the data collected may be disclosed to the following categories of recipients:</i> judicial authorities, self-employed persons, external consultants.	
Data transfer	<i>We inform you that the data will not be disseminated and will not be transferred to any non-EU country or international organisation.</i>	
Retention periods by category of personal data	<u>Category</u>	<u>Retention period</u>
	Report contents	<i>5 years from the date of communication of the final outcome of the whistleblowing procedure</i>
		<i>Any data that are manifestly not useful for the assessment of the report will be deleted immediately</i>

RIGHTS OF THE DATA SUBJECT

We also inform you of the following rights you may have vis-à-vis the Data Controller:

- **Right of access:** In accordance with Article 15 of the GDPR, the data subject has the right to ask the data controller for access to their personal data.
- **Right of rectification:** In accordance with Article 16 of the GDPR, the data subject has the right to ask the data controller for rectification of their personal data.
- **Right of erasure:** In accordance with Article 17 of the GDPR, the data subject has the right to ask the data controller for the erasure of their personal data.
- **Right of restriction:** In accordance with Article 18 of the GDPR, the data subject has the right to ask the data controller for the restriction of the data concerning them.
- **Right to object:** In accordance with Article 21 of the GDPR, the data subject has the right to object to their processing.
- **Right to lodge a complaint:** In accordance with Article 77 of the GDPR, the data subject may also lodge a complaint with a supervisory authority (for example, the Personal Data Protection Authority).

The rights referred to in Articles 15 to 22 of the Regulation may not be exercised where actual concrete detriment may result from their exercise (Art. 2(j) New Privacy Code - Italian Legislative Decree 196/2003 updated to Italian Legislative Decree 101/2018)

CONTACTS FOR EXERCISING RIGHTS

Requests for the exercise of one's rights may be addressed to the Data Controller as follows:

Address	Via Trento 22/24, 42042 Fabbrico (RE)	Contacts	Tel: +39 0522-665000 E-mail: info@rovatti.it
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