

**PERSONAL DATA PROCESSING POLICY PURSUANT TO ARTICLE 13 OF  
LEGISLATIVE DECREE no. 196 DATED 30.06.2003 & ARTICLE 13 OF EUROPEAN  
REGULATION 679/2016**

**Annex B** to the Organisational Document on the Whistleblowing procedure approved by VALMAR SPECIAL EQUIPMENTS S.r.l. at its meeting on 11/12/2023

Valmar Special Equipments S.r.l. (hereinafter, for brevity, the "Company" or "Data Controller") wishes to inform you, pursuant to the applicable legislation on the protection of personal data, including European Regulation 679/2016 on the protection of personal data ("Regulation"), that the personal data communicated to you in relation to the report you have made will be processed in compliance with the legislative and contractual provisions in force for the purposes and in the manner indicated below.

**1. Identity and contact details of the Data Controller and the Data Protection Officer**

The Data Controller is Valmar Special Equipments S.r.l., with registered office in Pontenure (PC) at Via G. Natta 30/32. The Data Protection Officer is Lawyer Elisa Cappellini, domiciled for the appointment at the headquarters of the Data Controller, having email address [elisacap@cclex.it](mailto:elisacap@cclex.it) (hereinafter, the "Data Processor").

**2. Categories of personal data, purposes and legal basis for processing**

With reference to the above, the Company will mainly process the following categories of personal data:

- a) Identification data, such as, for example, name, surname;
- b) Contact details, such as email and telephone number;
- c) Data relating to your legal relationship with the Company;
- d) Data relating to the report made.

The personal data indicated above is processed exclusively to follow up on your report and on the basis of your consent.

In the event that the report should give rise to disciplinary disputes or other legal actions against

the subjects in respect of whom the report is made, the data necessary for this purpose will be processed in order to manage the related litigation and to protect the rights of the Company. In this case, the lawfulness of the processing is based on the need to pursue the legitimate interests of the Company (Article 6.1[f] of the Regulation).

### **3. Methods of processing and nature of the transfer**

The personal data will be processed by the Company, through duly-authorized and trained subjects, with computer and paper systems according to the principles of correctness, loyalty and transparency established by the applicable legislation on personal data protection and on protecting your confidentiality and your rights through the adoption of suitable technical and organisational measures to guarantee a level of security adequate to the risk.

The provision and updating of your personal data is optional but failure to provide or revoke your consent will not allow you to follow up on the report.

### **4. Data storage**

All data relating to you will be stored within the platform <https://valmar.integrityline.com/> for the time necessary to process the report and in any case no later than five years from the date of communication of the final outcome of the reporting procedure. In the event of a dispute, this data shall be retained for the entire duration of the dispute and in any case until the applicable limitation period has elapsed. This period varies according to the type of data and the possible occurrence of interruptive or suspensive causes of the prescription itself.

### **5. Data Recipients**

Your data shall not be disclosed but for the purposes indicated above and in compliance with the principles of the Regulations, may be communicated to: employees of the Company or third parties in charge of managing the reporting channel, consultants and professionals. In fulfilling legal obligations, the data may be communicated to public bodies or to the Public Authority.

It is understood that, except with your express consent, in no case will your identity be communicated to subjects other than those in charge of receiving and managing the report. In the event of a disciplinary proceeding against the subject regarding whom the report is made, your identity will be revealed only if you consent and if the complaint is based, in whole or in part, on the reporting and knowledge of your identity is essential for the defence of the accused.

## **6. Rights of the Data Subject**

In relation to the processing of the data described therein, you may exercise the rights provided for by the applicable legislation on personal data protection, including the right to:

- Receive confirmation of the existence of your personal data and access its content (Right of Access);
- Update, modify and/or correct your personal data (Right of Rectification);
- Request the erasure or limitation of the processing of data elaborated in violation of the law, including whereby retention is not necessary in relation to the purposes for which the data has been collated or otherwise processed (Right to be Forgotten and Right to Limitation);
- Oppose the processing based on the legitimate interest (Right to Opposition);
- revoke consent, where given, without prejudice to the lawfulness of the processing based on the consent given prior to revocation;
- Lodge a complaint with the Supervisory Authority in the event of a breach of the rules on personal data protection;
- Receive a copy of the data in electronic format concerning them, rendered in the context of the employment contract (for example, data relating to salaries, internal mobility services) and to request that such data be transmitted to another Data Controller (Right to Data Portability).

To exercise these rights, you can contact the Data Protection Manager at any time, sending your request to the email address [elisacap@cclex.it](mailto:elisacap@cclex.it).

The undersigned \_\_\_\_\_ declares having viewed and read all parts of the aforementioned Policy pursuant to Article 13 of the European Regulation 697/2016.

Location \_\_\_\_\_

Date \_\_\_\_\_

Signature of the Data Subject

\_\_\_\_\_

The undersigned \_\_\_\_\_ grants their consent to the processing of data for the purpose of reporting, including storage (also by means of records).

Location \_\_\_\_\_

Date \_\_\_\_\_

Signature of the Data Subject

\_\_\_\_\_

The undersigned \_\_\_\_\_ grants their consent to the disclosure of their identity.

Location \_\_\_\_\_

Date \_\_\_\_\_

Signature of the Data Subject

\_\_\_\_\_

The undersigned \_\_\_\_\_ grants their consent to the disclosure of their identity, only where necessary for the protection of the accused party in the context of a disciplinary proceeding against them.

Place \_\_\_\_\_

Date \_\_\_\_\_

Signature of the Data Subject

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