



Information pursuant to data protection legislation personal data - Whistleblowing

Rev. 0

Of
11Dec2023

Pursuant to art.13 of Regulation (EU) no. 2016/679 (General Data Protection Regulation, hereinafter GDPR) and Legislative Decree 24/2023, Mollificio Valli Srl (hereinafter Owner) provides information regarding the processing of your personal data for the management of the Report Report submitted by you to the attention of the Company.

“Report” means any communication concerning violations and conduct aimed at hide violations of which employees, interns, have become aware in the workplace collaborators of companies supplying goods or services, as well as self-employed workers, freelancers and consultants who provide their services and carry out works in favor of the Owner, in accordance with the Legislative Decree n. 24/2023, implementing Directive (EU) 2019/1937 regarding the protection of people who report violations of Union law or national regulatory provisions (so-called "Decree Whistleblowing”).

1. Owner, DPO and categories of persons authorized to process data

The Data Controller of personal data is Mollificio Valli Srl, with headquarters in Oleggio Castello-Via Ceserio 39-28040 (NO).

The Data Controller has not appointed a DPO.

The Servizi Industriali Novara S.r.l.u. has been designated as external data controller.

2. Personal data categories

- Common personal data referred to in art. 4, point 1, of the GDPR of the Reporter (in the case of non-anonymous Reports) as well as any Persons involved or mentioned in the Report and Facilitators, as defined by the Whistleblowing Procedure (hereinafter "Interested Parties"), such as: personal data (e.g. name, surname, date and place of birth), contact details (e.g. landline and/or mobile telephone number, postal address/e-mail).
- Special categories of data referred to in art. 9) of the GDPR, if included in the report.

3. Purpose of processing and related legal basis

The aforementioned personal data is processed by the Data Controller for the following purposes:

- management of the Report carried out pursuant to Legislative Decree No. 24/2023;
- fulfillment of obligations established by law or community legislation;
- defense or verification of one's right in civil, administrative or criminal disputes.

The legal basis of the processing consists of:

- for the purposes referred to in letter a), from the fulfillment of a legal obligation to which the Data Controller is subject processing (art. 6, par. 1, letter c) of the GDPR); furthermore, for registered reports collected through systems of voice messaging or in any case in oral form, by the consent of the Reporter (art. 6, par. 1, letter a) of the GDPR);
- for the purposes referred to in letter b), from the fulfillment of a legal obligation to which the Data Controller is subject (art. 6, par. 1, letter c) of the GDPR);



- for the purposes referred to in letter c), by the legitimate interest of the owner (art. 6, par. 1, letter f) of the GDPR.

The provision of data is necessary to achieve the above purposes; their failure, partial or incorrect provision could result in the impossibility of managing the report.

4. Storage of personal data

The Data Controller stores personal data according to the terms set out in the art. 14 of Legislative Decree no. 24/2023, i.e. for the time necessary to process the report and in any case for no more than 5 years from the date of communication of the final outcome of the Report.

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

5. Treatment methods

The data - where provided and collected - will also be processed with electronic tools, recorded in special ones databases, and used strictly and exclusively for the purposes indicated. These tools are suitable for guarantee the security of the processing and confidentiality of the personal data collected, as well as to avoid access unauthorized, dissemination, modifications and theft of data, thanks to the adoption of adequate measures technical and organizational safety, in compliance with the aforementioned legislation and the related obligations confidentiality and, in any case, according to the purposes and methods reported in this information.

6. Categories of third parties to whom the data could be communicated

Some processing of personal data may be carried out by third parties, to whom the Data Controller entrusts certain activities (or part of them) for the purposes referred to in point 3); these subjects will operate as independent Data Controllers or will be designated Data Controllers and are essentially included in the following categories:

- a. Consultants (CNVV, CdL, Law Firms, etc.)
- b. Companies in charge of administration and personnel management
- c. Auditing/review company
- d. Investigative agencies
- e. Institutions and/or Public Authorities, Judicial Authorities, Police Bodies.



7. Diritti degli interessati

The Report management system guarantees, at every stage, the confidentiality of the identity of the Reporter, of the Persons involved and/or otherwise mentioned in the Report, of the content of the Report and of the related documentation, without prejudice to the provisions of the art. 12 of Legislative Decree no. 24/2023.

The reporting party or the facilitator have the right to access the data concerning them at any time and exercise the rights provided for in articles 15 to 22 of the GDPR, as applicable (right of access to personal data, right to rectify them, right to obtain their deletion or the right to be forgotten, the right to limit processing, the right to portability of personal data or the right to object to processing) by sending an email to the address:privacy@mollificiovalli.it.

Furthermore, the interested party has the right to lodge a complaint with the Guarantor for the protection of personal data.

The aforementioned rights cannot be exercised by the person involved or by the person mentioned in the report, for the time and within the limits in which this constitutes a necessary and proportionate measure, pursuant to art. 2-undecies of the Privacy Code as the exercise of these rights could result in an effective and concrete prejudice to the protection of the confidentiality of the identity of the reporting person.

The Owner reserves the right to limit or delay the exercise of said rights, within the limits of what is established by the applicable legal provisions, in particular where there is a risk that harm may result effective, concrete and not otherwise justified to the confidentiality of the identity of the Reporter and that it is possible compromise the ability to effectively verify the validity of the Report or to collect the necessary tests.