

Subject: Information on the processing of personal data, pursuant to art. 13, EU Regulation no. 2016/679 – “GENERAL DATA PROTECTION REGULATION” (hereinafter “GDPR”)

With this information, we wish to inform you of the ways in which our company, VITE COLTE SpA, processes your personal data, communicated by you as part of the whistleblowing process. This information is available on the website www.vitecolte.it, under privacy. Unless specified, all legal articles cited in this document refer to the GDPR.

1) Data controller

The data controller is the company VITE COLTE SpA, with registered office in Via Bergesia, 6 in Barolo (CN – 12060) and VAT number: 02793640042.

2) RDP – DPO appointment

The Data Controller, not falling within the cases indicated by the Art. 37 of the GDPR, nor in those indicated in the various interpretations of the Guarantor Authority, has not deemed it necessary to appoint a Data Protection Officer.

3) Object of the treatment

The whistleblowing process adopted by the Data Controller allows you to communicate with the ODV to report any crimes or violations of regulations that you have witnessed or become aware of. This procedure requires you to submit a report, nominative or anonymous, and in this report to describe the methods and circumstances of the crime or violation referred to above.

In case of nominative reporting, the processing has as its object personal, identification and contact data (for example, name, surname, username, telephone, e-mail) hereinafter, "personal data", in addition to all the data that you decides to include in the report or subsequent communications.

In the case of anonymous reporting, the Data Controller will only process the information that you decide to share to better describe the violation or crime that is the subject of the report, obviously including information relating to other interested parties (for example names and surnames of the subjects who She intends to report).

4) Purpose of the processing, legal basis, nature of the provision.

The purpose of the processing referred to in point 3 is to make it possible to report crimes or violations, their investigation and further steps aimed at repressing the highlighted incorrect behavior. The processing of such data is legitimate by legal obligation and legitimate interest of the Data Controller (art. 6, paragraph 1, letters c and f), it is optional to the extent that you are not obliged to forward a report or necessarily forward it in nominative, but when the Data Controller receives the report, he can process the data (only for the express purposes) without your consent.

5) Treatment methods, duration of treatment

The processing of your personal data is carried out by means of the operations indicated in the Art. 4 no. 2) of the GDPR and precisely: collection, recording, organisation, conservation, consultation, use, blocking, communication, cancellation and destruction. Your personal data is subjected to electronic processing. All the data provided by you in this context are stored on the cloud server on which the system dedicated to Whistleblowing resides, and are stored for a period of 10 years from the closure of the report, unless otherwise requested by law enforcement agencies and /or judicial authorities.

6) Data access

Your data may be made accessible for the purposes referred to in point 4) to employees and collaborators of the Data Controller, in their capacity as authorized data controllers and/or system administrators, and to the Supervisory Body appointed pursuant to Legislative Decree 231 /2001, in the capacity of External Data Processor.

7) Data communication

Without the need for express consent (pursuant to art. 6 letter b), c) of the GDPR), the Data Controller may communicate your data for the purposes referred to in point 4) to supervisory bodies, judicial authorities, as well as to those subjects to whom communication is mandatory by law for the fulfillment of the aforementioned purposes. These subjects will process the data in their capacity as independent data controllers. Your information will not be disseminated.

8) Transfer of data to non-EU countries

The personal data provided, referred to in point 3) are stored in electronic format in the cloud archive of the Manager appointed by the Data Controller, within the European Union.

9) Rights of the interested party

In your capacity as an interested party, you enjoy the rights referred to in the articles. 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. In detail:

- Right of access
- Right of rectification
- Right to erasure (“right to be forgotten”)
- Right to restriction of processing
- Right to notification in the event of rectification or deletion of personal data or restriction of processing
- Right to data portability
- Right of opposition
- Rights relating to Automated Decision Making relating to natural persons, including profiling

10) Method of exercising the rights of the interested party

You can exercise your rights at any time by sending:

- a registered letter addressed to the Data Controller, referred to in point 1)
- an e-mail to the address: privacy@vitecolte.it

VITE COLTE SpA
Barolo (CN)