 CASTELLINI®	INFORMATIVA SULLA PRIVACY <small>(ai sensi e per gli effetti di cui all'art. 12, 13 e 14 del Reg. UE 2016/679)</small>	MDP 08.D Rev. 00 del 04/09/2023
	WHISTLEBLOWING	

Dear Interested Party,

Castellini Officine Meccaniche Srl informs you that the personal data you have provided through the use of the whistleblowing reporting system will be processed in accordance with the principles of legality and fairness, and we invite you to read this information notice:

1. Data Controller and Contact Information

1.1 The Data Controller is Castellini Officine Meccaniche Srl, located in Cazzago San Martino, Via Privata Giuseppe Castellini, no. 2, tel. 030.7256211, email personale@castellini.it, in the person of the company's Legal Representative.

2. Subject of Personal Data Processing

2.1 The following personal data will be processed: your identification data (name, surname) as a whistleblower, in case the report is made by you.

2.2 Your identification data (name, surname) as a facilitator, involved person, or connected subject if the report is forwarded by third parties.

3. Purpose and Legal Basis of Processing

3.1 The processing will be carried out for the management of the Whistleblowing procedure in accordance with current regulations, to verify the validity of the reported fact, to adopt subsequent measures, to protect a right in court, and to respond to any requests from the Judicial Authority.

3.2 The legal basis for processing, regarding the report made by you, lies in the legitimate interest of the data controller and in compliance with legal obligations.

3.3 The provision of data is necessary for the management of the Whistleblowing procedure and all subsequent compliance. Your explicit consent is not required.

3.4 Regarding cookies, please refer to the specific section of the reporting platform.

4. Recipients of Personal Data

4.1 Personal data may be accessed exclusively by subjects who have a role in the management of the Whistleblowing procedure (specifically identified internal subjects and subjects identified by these, and possibly involved external consultants). These subjects are bound by a duty of confidentiality, official appointments as External Managers, and specific instructions and regulations.

4.2 Access to personal data for strictly technical purposes related to the platform may be granted to service providers for the management of the report, who will act as data processors/system administrators based on specific instructions provided by the owner.

4.3 The Judicial Authority, the Public Authority, ANAC, and, in general, all subjects to whom communication must be made by law, may also have access to the data and information collected.

4.4 Personal data will not be communicated to parties other than those identified above, nor will it be disseminated.


4.5 The data will not be transferred to countries outside the EU.

5. Mandatory Nature of Data Provision

5.1 The provision of personal data is necessary to pursue the indicated purpose of personnel search.

6. Data Processing Methods

6.1 The data you provide will be processed using manual and computer tools, without the aid of algorithms. The data will not be disseminated and will not be transmitted outside the European Community.

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7. Rights of the Data Subject

7.1 Regulation (EU) 2016/679 recognizes the exercise of specific rights:

- You may exercise the rights provided for by the GDPR articles 15 to 22 by contacting the owner at one of the contact points indicated in this information notice, except for the situation described in point 5.3.
- You may exercise the right to lodge a complaint provided for by article 77 of the GDPR.
- As provided for by article 2-undecies of Legislative Decree 196/2003, the involved person or the person mentioned in the report, with reference to their personal data processed within the scope of the report, public disclosure, or complaint, cannot exercise – for the time and within the limits in which this constitutes a necessary and proportionate measure – the rights that normally Regulation (EU) 2016/679 recognizes to data subjects (the right of access to personal data, the right to rectify them, the right to have them deleted or the so-called right to be forgotten, the right to restrict processing, the right to data portability and the right to object to processing). The exercise of such rights could result in actual and concrete harm to the protection of the confidentiality of the identity of the reporting person.

You can find the full rights in the text of EU Regulation 2016/679 articles 15 to 22 at the link [\[https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:32016R0679&from=IT\]](https://eur-lex.europa.eu/legal-content/IT/TXT/PDF/?uri=CELEX:32016R0679&from=IT)

7.2 How to Exercise Your Rights 7.2.1 To exercise your rights, you can send a request to the email address personale@castellini.it.

7.3 Right to Withdraw Consent

7.3.1 Regarding data processing based on consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

7.3.2 Withdrawal of consent must be communicated in writing to personale@castellini.it.

7.4 Right to Lodge a Complaint with an Authority

7.4.1 You also have the right to lodge a complaint with the Personal Data Protection Authority, - pursuant to article 77 of the Regulation, if you believe that the processing concerning you violates the provisions of the EU Regulation.

8. Data Retention

8.1 Personal data may be stored for a limited period of time necessary to achieve the purposes for which they are collected.

8.2 Reports and related documentation are stored for the time necessary and in any case no longer than five years from the date of communication of the final outcome of the reporting procedure.

8.3 A further period of retention imposed by law or necessary for the protection of a right is reserved.

9. Additional Information

The data controller remains available for any need for clarification, by calling or writing to the contacts listed in point 1.

Castellini Officine Meccaniche