

## DATA PROCESSING DISCLOSURE



Information on the processing of personal data of persons reporting breaches of European Union law or of national regulatory provisions, of persons involved, of persons mentioned and of facilitators.

FABA SRL, as the data controller of personal data (hereinafter "FABA"), issues this disclosure to the whistle-blower, to the persons involved, to the persons mentioned and to facilitators in compliance with the European and Italian regulations on the protection of personal data.

FABA has appointed a Data Protection Officer (DPO), who can be contacted at the following address: [dpo@myfaba.com](mailto:dpo@myfaba.com).

## Purpose and legal basis of the processing

FABA processes personal data in order to perform the necessary investigative activities aimed at verifying the validity of the reported fact and at adopting the consequent measures.

Consent is not required because the processing is necessary for the fulfilment of the regulatory obligations imposed on FABA on the basis of the provisions of Legislative Decree no. 24 of 10 March 2023.

## Categories of data and their sources

FABA processes data of a common nature (first name, surname, qualification, etc.), data of a particular nature (data relating to health, trade union membership, etc.) and/or data relating to criminal convictions, crimes and security measures: this information may be collected directly from the person to whom they refer (hereinafter "Data Subject") and/or from third parties (e.g. when the whistle-blower provides information on the person involved and/or on other persons mentioned and/or on the facilitator, or when during the investigation further information/official documents are acquired from other FABA areas).

## Retention period of collected data

The data collected are kept for the time necessary to process the report and for the period necessary to implement the related administrative procedure or any judgement established and in any



case no later than 5 years from the date of communication of the final outcome of the reporting procedure.

## Nature of data provision and consequences in case of refusal

The provision of personal data is optional, but necessary for the management of reports and related activities, with the consequence that any refusal prevents this from proceeding.



## Categories of recipients

During management of the report, personal data may be processed by internal figures specifically authorised for the purposes indicated, as well as by service providers or by other external parties (e.g. operators of platforms used for the management of reports), who will process the data as data processors on behalf of FABA.

If the details exist, personal data may be transmitted to third parties to whom communication is required by law (e.g. Judicial Authority, National Anti-Corruption Authority, etc.).

Under no circumstances will personal data be disclosed.

## Data transfer to a third country and/or to an international organisation

Personal data are not transferred either to non-European third countries or to international organisations.

## Rights of Data Subjects

Data Subjects have the right to obtain access to their personal data, updating (or correction, if inaccurate), deletion of the same or limitation of the processing that concerns them, when the respective conditions are met and in particular within the limits of

what is provided for by art. 2-*undecies* of Legislative Decree no. 196/2003.

To exercise their rights, the Data Subject may use the form available at the link

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and forward it to the person

responsible for managing the report, contacting the same via the channel used for the report, or at FABA S.r.l., with registered office at Via G. Bortolan, 28 – 31050 Vascon di Carbonera (TV). The data subject also has the right to lodge a complaint with the competent supervisory authority, the Data Protection Authority.

([www.garanteprivacy.it](http://www.garanteprivacy.it)).

