



INFORMATION ON THE PROCESSING OF PERSONAL DATA

PURSUANT TO ARTICLES 13 AND 14 OF EU REG. NO. 2016/679

In compliance with Lgs. D. 24/2023 of 'Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and on provisions concerning the protection of persons who report breaches of national laws' ('Legislative Decree. 24/2023'), RBM SPA has activated a platform to allow the transmission of reports of violations pursuant to Leg. 24/2023 by persons envisaged by the legislation itself, so-called Reporting parties.

The channel also allows the anonymous transmission of reports. However, if the Reporting party chooses to transmit his or her personal data, if documents, attachments or the report contains personal data referring to the Reporting party, the reported person and/or third parties, the company will process the personal data contained therein for the purpose of handling the report.

Therefore, we wish to inform you in advance, pursuant to Art. 13 and 14 of Reg. EU 2016/679, this processing will be based on the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, limitation of retention, integrity and confidentiality and accountability, as well as protection of privacy and rights.

1. DATA CONTROLLER

The data controller is RBM SPA - with registered office in S.Giovanni di Polaveno (BS), via Industriale n.23 - CAP 25060 (tax code 00293730172), in the person of its legal representative pro tempore, email: privacy@rbm.eu

2. TYPE OF DATA PROCESSED

The receipt and management of reports, gives rise to the processing of so-called 'common' personal data (e.g. personal details, contact details, data relating to work activity) and/or any other information connected with the alleged or founded unlawful conduct, as well as may give rise, depending on the content of the reports and the acts and documents annexed thereto, to the processing of so-called 'sensitive' personal data (data relating to health, sexual orientation, political opinions or trade union membership, as referred to in Art. 9 GDPR) and personal data relating to criminal convictions and offences (referred to in Art. 10 GDPR).

RBM S.p.A.

Sede legale:

Via Industriale, 23
25060 S. Giovanni di Polaveno (BS)

Sede amministrativa:

Via S. Giuseppe, 1
25075 Nave (BS)

C.S. i.v. € 17.000.000

Reg. imprese BS 00293730172

P.IVA 00551250988

SDI: A4707H7

Soggetta a direzione e coordinamento

ex art. 2497-bis c.c. di GLBS S.r.l. a socio unico

T. +39 030 2537211

F. +39 030 2531798

www.rbm.eu

info@rbm.eu



3. PURPOSE OF DATA PROCESSING AND LEGAL BASIS FOR DATA PROCESSING

Personal data are processed for the following purposes:

- a) to enable you to make a Report in accordance with the applicable whistleblowing legislation;
- b) to handle Reports in accordance with the applicable whistleblowing legislation, including the investigative activities aimed at verifying the justification of the fact which is the subject of the Report and the adoption of the consequent measures;
- c) to comply with any requests from the Judicial Authorities, the ANAC or the Data Protection Authority;
- d) to ascertain, exercise or defend in judicial and/or extrajudicial proceedings the rights or interests of the Controller or of third parties.

In particular, for the purposes set out in points a) and b), taking into account the reference legislation (Legislative Decree no. 24/2023), the legal basis is the fulfilment of a legal obligation that the data controller is subject to (Legislative Decree no. 24/2023).

The processing of special data is permitted under Art. 9 par. 2 lett. B) of the GDPR.

The processing of judicial data is permitted pursuant to Art. 10 paragraph of the GDPR, as authorised by a provision of law (Legislative Decree 24 of 2023).

For the purposes referred to in points c) and d), the legal basis for the processing is the pursuit of a legitimate interest of the data controller or of a third party.

4. NATURE OF DATA PROVISION

The provision of your personal data is optional, as the company platform allows the transmission of reports also in anonymous form, as provided for by Legislative Decree 24 of 2023.

In the cases referred to in Art. 12 paragraph 2 of Legislative Decree 24/2023, the identity of the Reporting party and any other information from which such identity may be inferred, directly or indirectly, may be disclosed, only with the express consent of the reporting person himself/herself, to persons other than those competent to receive or follow up the Reports, who are expressly authorised to process such data.

5. DATA RETENTION AND TRANSFER PERIOD

Personal data are retained for as long as necessary for the management of the Report and in any case no longer than five years from the date of communication of the final outcome of the reporting procedure, unless the retention is necessary to comply with a legal obligation or an order of the Authority.

Your personal data will be processed within the EU.

6. METHOD OF PROCESSING

The processing will be carried out by manual and computerised means.

Specific security measures are observed to prevent loss of data, unlawful or incorrect use and unauthorised access.

The Data Controller takes appropriate security measures to protect your data and ensure the confidentiality of your report.

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7. AUTOMATED DECISIONS AND DISSEMINATION OF DATA

There is no automated decision-making process. The personal data processed will not be disseminated.

8. RECIPIENTS OF PROCESSING

Your personal data may be shared with:

- the Whistleblowing Committee of the Whistleblowing Manager;
- the supplier of the dedicated web platform for Reporting;
- the Platform Developer for maintenance activities
- in the event of consent, internal functions involved in the investigation/discovery of the facts that are the subject of the Report;
- external consultants, who may be involved in the investigation and management of the Report;
- parties, bodies, entities or authorities to which disclosure is mandatory by law or regulation.

In the cases provided for, these persons will be appointed as external data processors pursuant to Art. 28 of the GDPR or authorised for processing pursuant to Art. 29 of the GDPR and Art. 2 quaterdecies of Legislative Decree No. 196/2003. A list of appointed data controllers is available from the Data Controller.

9. EXERCISE OF THE DATA SUBJECT'S RIGHTS

Note that, pursuant to Articles 15 to 22 of the GDPR, it is possible to exercise, within the limits of Article 2-undecies of the Privacy Code and Legislative Decree 24 of 2023, the right to:

- a) access personal data;
- b) their rectification in the event of inaccuracy;
- c) deletion of data;
- d) limitation of processing;
- e) the right to data portability, i.e. to receive in a structured, machine-readable format, the personal data provided and to have them transferred to another data controller without hindrance;
- f) the right to object to processing, if the conditions are met.

Furthermore, it is possible for the person concerned to lodge a complaint with the Data Protection Authority. Requests may be addressed to the Controller's addresses.

Nave, 06/12/2023

Data Controller
RBM S.P.A.

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