

Rev. n.	Review Date	Modification description	Drafting ( Person – Function )	Verification ( Person – Function )	Approval (Person – Function)
0	08/08/2024	Initial Draft	D.Zanzot (LE)	F.Bertolin (GQ)	M.Pizzato (DGEN)

## SUMMARY

1.	Introduction .....	2
2.	Data controller .....	2
3.	Data processed .....	2
4.	Purpose of the processing .....	2
5.	Legal basis of the processing .....	2
6.	Provision of the Data and consequences of refusal .....	3
7.	Data processing .....	3
8.	Data communication .....	3
9.	Rights of the Interested Party .....	3
10.	Retention period .....	4

Copyright © 2024 Pizzato Elettrica s.r.l.

Ogni diritto derivante dal presente documento è riservato. L'archiviazione, la riproduzione e la distribuzione, totale o parziale, a prescindere dal mezzo o dalla forma utilizzati, del materiale ivi contenuto è espressamente vietata in assenza di autorizzazione scritta da parte del titolare. All rights reserved. No part of this document can be stored, reproduced or transmitted in any form or by any means, without the prior written permission of the owner.

## 1. Introduction

---

This Policy has been drawn up to allow anyone who comes into contact with Pizzato Elettrica s.r.l. to make a Report pursuant to Legislative Decree n. 24/2023 on Whistleblowing to know the policy on the processing of personal data pursuant to EU Regulation no. 2016/679 (hereinafter '**GDPR**'), the relevant national legislation and Articles 13 and 14 of Legislative Decree n. 24/2023. This Policy constitutes an annex and is an integral part of the Whistleblowing Procedure.

It should be noted that for the purposes of this document the term '**Interested Party(ies)**' refers to the Addressees of the aforementioned Procedure and defined therein.

## 2. Data controller

---

The Data Controller is the company PIZZATO ELETTRICA SRL (P. IVA 01704080249), with registered office in Marostica, Via Torino, 1 (hereinafter also referred to as '**Data Controller**').

## 3. Data processed

---

The Data Controller may process:

- common personal data (e.g. name, surname) of the Whistleblower in case of Reports made in a non-anonymous form.
- personal data referring to the person involved in the Report and/or to the Reported and that the Whistleblower intended to provide to represent the facts described in the Report. It is specified that in this case the Data Controller is not in a position to predetermine the data that are the subject of the Report, which may therefore also include special and/or judicial data (e.g. criminal convictions, offences, etc.).

hereinafter referred to generically as '**Data**'.

## 4. Purpose of the processing

---

The Data Controller shall process the Data of the Interested Party for the management of activities connected with or instrumental to the verification of the Report received in respect of alleged unlawful conduct within the meaning of Legislative Decree n. 24/2023, of which the Interested Party has become aware by reason of his or her employment or contractual relationship with the Data Controller.

## 5. Legal basis of the processing

---

The legal basis of the processing is:

- Article 6 paragraph 1 lett. c) of the GDPR - the fulfilment of a legal obligation to which the Data Controller is subject;
- Article 6 paragraph 1 lett. c) of the GDPR - pursuit of the Data Controller's legitimate interest.

Moreover, according to article 12 of the Legislative Decree n. 24/2023, the Whistleblower whose common personal data are known, may be called upon to give its consent for the disclosure of its identity if this is necessary for the purposes of challenging the Reported in respect of the Violation that is the subject of the Report. In this case, the legal basis of the processing will be the consent given by the Whistleblower pursuant to Article 6, paragraph 1, letter a), of the GDPR.

## 6. Provision of the Data and consequences of refusal

---

The provision of his/her data by the Whistleblower is optional, since he/she may avail him/herself of the right to remain anonymous. It should be noted, though, that the identity of the latter may be disclosed during the disciplinary proceedings initiated by the Company against the Reported, only with the Whistleblower's consent and only where the disclosure is indispensable to guarantee the Reported's right of defence in disciplinary proceedings, as provided for in Article 12 of Legislative Decree n. 24/2023. In such a case, the Whistleblowing Officers will notify the Whistleblower in writing so that he/she can give his/her consent. It should be noted that in the absence of consent, the violation referred to in the Report cannot be contested to the Reported and the Report will be consequently archived.

The provision of Data of the Reported or of other persons involved in the Report is optional. However, failure to provide such Data may make it impossible to proceed with the management of the Report, if it is not otherwise possible to identify the Reported, and the Report will be consequently archived.

The provision of Data of other subjects involved in the Report by the Whistleblower is optional. However, failure to provide such Data may make it impossible to carry out further investigations with respect to the facts of the Report, therefore affecting the outcome of the same.

## 7. Data processing

---

Regarding Internal Reports pursuant to Articles 4 and 5 of Legislative Decree 24/2023, the processing of Data shall be carried out by persons, called Whistleblowing Officers, specifically appointed pursuant to Articles 28 and 29 of the GDPR by the Data Controller.

The processing will be carried out using both paper and computerised and/or telematic instruments with organisational methods and logics strictly related to the purposes indicated, in full compliance with the principles of protection provided for by the GDPR, always guaranteeing the confidentiality of the Whistleblower's Data.

The Data Controller undertakes to observe specific security measures to prevent the loss of Data, unlawful use, theft, improper use and unauthorised access, in full compliance with the laws and regulations. Processing operations shall be carried out by Data Processors and/or Persons in charge of processing designated by the Data Controller, and shall operate under the latter's direct authority, in full compliance with the instructions received.

## 8. Data communication

---

The Data may be made accessible, for the purposes indicated in Article 3, only to the subjects specifically identified by the Data Controller pursuant to Articles 28 and 29 of the GDPR to carry out the processing referred to in Legislative Decree n. 24/2023 with respect to Internal Report, as provided for in Articles 4 and 5 of the same decree.

The following entities may also become aware of the Data of the Interested Parties stored in the Data Controller's IT systems:

- Providers of electronic communication services and computer and telematic services for the storage, processing and management of Data;
- Providers of computer system maintenance services.

All subjects acting as external Data processors have received a specific appointment from the Data Controller.

In the cases expressly envisaged by Legislative Decree n. 24/2023, the Data relating to the Report may be communicated to the civil, criminal and administrative judicial authorities, which will act as independent data controller.

## 9. Rights of the Interested Party

---

By sending a request to the e-mail address [info@pizzato.com](mailto:info@pizzato.com) or by registered letter with return receipt to the postal address of the Data Controller, the Interest Party has the right to obtain from the latter:



- (art.15) access to his/her Data, the information related to the same, a possible copy of the Data being processed;
- (art. 16) the rectification of inaccurate Data or the integration of incomplete Data;
- (art. 17) the deletion of the Data concerning him/her;
- (art. 18) the limitation of the processing of the Data;
- (art. 20) the Data in a structured and machine-readable format, also for the purpose of communicating such Data to another Data Controller.

He/she also has the right:

- - (art. 21) to object at any time to the processing for reasons related to a particular situation;
- - (Art. 7, paragraph 3) to revoke, at any time, the consent given, if the processing has its legal basis therein.

This is without prejudice to the Interested Party's right to lodge a complaint with the Data Protection Authority - [www.garanteprivacy.it](http://www.garanteprivacy.it) if he or she considers that the processing violates EU Regulation 2016/679.

## 10. Retention period

---

The Data provided through the Report will be retained for as long as necessary for the processing of the Report, and in any case no longer than five years from the date of communication of the outcome of the Report procedure. In the event of legal proceedings, the aforementioned period is extended until all levels of proceedings have been exhausted.

Personal data that are clearly not useful for processing a specific Report are not collected or, if accidentally collected, are deleted.

Marostica,

PIZZATO ELETTRICA S.R.L.

### For acknowledgement:

PLACE AND DATE	NAME AND SURNAME	SIGNATURE