
	file: IP 04 Information on data processing - Whistleblowing		Ed. 1 Rev. 0
	Sisam Agenti Srl Scali Cerere, 15 57122 Livorno	Sisam Agenti Srl via dei Conciatori, 9/11 70123 Modugno (BA)	06.12.2023
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**INFORMATION ON THE PROCESSING OF PERSONAL DATA
pursuant to Articles 13 and 14 of Regulation (EU) 2016/679
IN RELATION TO WHISTLEBLOWING REPORTS and ORDINARY REPORTS**

Sisam Agenti Srl hereby wishes to inform the whistleblower about the processing of personal data relating to "Whistleblowing" reports and ordinary reports pursuant to Article 13 of EU Reg. 2016/679 and any subjects involved in the report pursuant to Article 14 of EU Reg. 2016/79.

DATA CONTROLLER	The Data Controller is Sisam Agenti Srl with registered office in Scali Cerere, 15 - 57122 Livorno (LI) which you can contact by writing to the following e-mail address: privacy@sisam.it or by calling +39 0586 243814.
DATA PROTECTION OFFICER (DPO)	The designated Data Protection Officer is Pratika S.r.l., (contact person Alex Stellini) who can be contacted by writing to the following e-mail address: dpo@gruppopk.com , or by calling the +39 0432 807545.
PERSONAL DATA PROCESSED	<p>In principle, the reporting method indicated in the procedure can be used - to the extent permitted by law and by the procedure to which this policy refers - without providing personal data. However, as part of the reporting process, you may voluntarily disclose personal data, in particular information about your identity, first and last name, country of residence, telephone number or e-mail address.</p> <p>The receipt and management of reports, based on the content entered by the whistleblower, may give rise to the processing of special categories of personal data, such as information on racial and/or ethnic origin, religious and/or ideological beliefs, trade union membership or sexual orientation.</p> <p>The report may also contain personal data of third parties. Interested parties have the opportunity to comment on the report. In this case, we will inform the persons concerned about the information. The confidentiality of the whistleblower will be preserved, as the person concerned will not receive any information about his or her identity - as far as legally possible - and the information will be used in such a way as not to endanger anonymity.</p> <p>Data that are not useful for reporting will be immediately deleted in order to comply with the principles of purpose and minimization of processing.</p>
PURPOSE OF THE PROCESSING	<p>The data directly provided by the whistleblower to communicate alleged unlawful conduct of which he/she has become aware due to his/her employment, service or supply relationship with the Data Controller, will be processed by the Entity itself to manage such situations.</p> <p>Personal data are acquired as they are contained in the report and/or in deeds and documents attached to it, refer to the reporting party and may also refer to persons indicated as possible responsible for the unlawful conduct, as well as to those involved in various ways in the reported events.</p> <p>The data, therefore, will be processed to carry out the necessary investigative activities aimed at verifying the validity of what has been reported, as well as, if necessary, to adopt appropriate corrective measures and take the appropriate</p>

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	disciplinary and/or judicial actions against those responsible for the illegal conduct.
DATA RETENTION PERIOD	Personal data will be stored for a period of five years from the date of communication of the final outcome of the reporting procedure.
LEGAL BASIS	The processing of personal data, whether "common", particular pursuant to Article 9 of the GDPR or judicial, is necessary to implement the legal obligations provided for by the whistleblowing regulations, compliance with which is a condition for the lawfulness of the processing pursuant to Article 6, paragraph 1, letter c) and par. 2 and 3, art. 9, par. 2, lett. b) and art. 10 and 88 of the GDPR.
PROVISION OF DATA	In order to classify the report as whistleblowing, the identification data of the whistleblower (name, surname) must be provided; In the event that the whistleblower wishes to proceed with an anonymous report, the latter will be considered as an ordinary report.
DATA RECIPIENTS	<p>Personal data will be processed by the recipient, identified in the procedure to which this policy refers.</p> <p>The personal data of the whistleblower and those of the persons indicated as possible responsible for the unlawful conduct, as well as of the persons involved in various ways in the reported events, will not be disseminated, however, if necessary, at their request, they may be transmitted to the Judicial Authority as an independent Data Controller.</p> <p>In the context of any criminal proceedings instituted, the identity of the whistleblower will be covered by secrecy in the manner and within the limits provided for by art. 329 c.p.p.; In the context of disciplinary proceedings, the identity of the whistleblower will not be revealed in all cases in which the challenge to the disciplinary charge is based on separate and additional investigations with respect to the report, even if consequent to the same, while it may be revealed where three conditions are met, namely:</p> <ul style="list-style-type: none"> (a) that the dispute is based, in whole or in part, on the report, (b) that knowledge of the identity of the whistleblower is indispensable for the defence of the accused, (c) that the whistleblower has given specific consent to the disclosure of his/her identity.
PERSONS AUTHORISED TO PROCESS DATA	Only the receiving entity is able to associate the reports with the identities of the whistleblowers. If investigative requirements require that other parties must be made aware of the content of the report or of the documentation attached to it, the identity of the whistleblower will never be revealed, nor will elements that could, even indirectly, allow the identification of the same. These subjects, since they may in any case become aware of other personal data, are in any case all formally authorized to process and specifically instructed and trained for this, as well as required to maintain the secrecy of what they have learned due to their duties, without prejudice to the reporting and reporting obligations pursuant to art. 331 of the Code of Criminal Procedure.

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PROCESSING METHODS

The data may be processed in analog or computerized form according to the methods identified by the company as communication channels and identified in the procedure referred to in this policy.

In any case, personal data will be processed in compliance with the regulations provided for by the GDPR and in particular ensuring compliance with the principles of transparency, purpose limitation, minimization, storage limitation, integrity and confidentiality.

RIGHTS OF THE DATA SUBJECT AND COMPLAINT

In accordance with the provisions of Legislative Decree no. 24/2023, the classic rights of the data subject provided for by the GDPR in art. 15-22, may be exercised within the limits of the provisions of art. 2-undecies of the Privacy Code. The latter article states that the aforementioned rights – including the right of access – cannot be exercised if there is an actual and concrete prejudice to the confidentiality of the identity of the person reporting violations (paragraph 1, letter f).

If the whistleblower has provided personal data, he/she has the right to information, correction and erasure of personal data. You may also restrict the processing or request that it be transferred to another responsible entity.

In addition, you have the right to object at any time to the processing of your personal data on grounds arising from your particular situation.

The whistleblower has the right to withdraw consent at any time. The withdrawal of consent does not affect the lawfulness of the processing carried out up to the revocation.

The exercise of these rights can be activated by contacting the recipient of the report or the person responsible for the protection of personal data referred to above. If you exercise your right to rectification, erasure or restriction of processing, the Data Controller is obliged to inform all recipients to whom the personal data have been disclosed, unless this proves impossible or involves a disproportionate effort.

You have the right to lodge a complaint with the competent supervisory authority in the Member State in which you habitually reside or work or in the State where the alleged infringement occurred.