

Disclosure pursuant to articles 13 and 14 of Regulation (EU) 2016/679

This information describes the purposes and methods of processing the personal data of reporting persons who make reports pursuant to and for the purposes of D. Lgs. March 10, 2023, n. 24, and what are their rights under the GDPR.

1. Data controller

Depending on whether the report concerns a SECO Group company, this will act as an independent data controller ("Controller"). If the report concerns more than one SECO Group company, each of them acts as a separate data controller for their own purposes.

The following companies of the SECO Group are responsible for processing personal data:

SECO S.p.A. with registered office in Arezzo (AR) 52100, Via Achille Grandi n. 20. - privacy@seco.com.

PSM TECH S.r.l. with registered office in Arezzo (AR) 52100, Via Achille Grandi n. 18 - privacy@PSMTECH.com.

SECO Mind S.r.l., with registered office in Arezzo (AR) 52100, Via Achille Grandi n. 20 - privacy@secomind.com.

For any clarification regarding the processing of your personal data, you can contact the Data Controller by writing to the e-mail addresses listed above.

2. Purpose of processing and legal basis

The processing is aimed at receiving, analyzing, investigating and managing reports and any subsequent actions.

The legal basis of the processing is a legal obligation pursuant to art. 6, paragraph 1, lett. (b) GDPR and the legitimate interest of the Data Controller to be able to manage the reports received, pursuant to art. 6, paragraph 1, lett. (f) of the GDPR.

With particular reference to alerts made by recording a voice message, the legal basis is the consent of the informer under and for the effects of art. 6, paragraph 1, lett. (a) of the GDPR.

3. Categories of data processed

In the context of the management of the reporting of the offenses detailed by the business procedure adopted by the SECO Group, the Data Controller may collect and process the data directly provided by you, in particular:

- the personal details and identification of the reporting person (e.g. first name, surname), in cases where the option of anonymity has not been chosen;
- Identifying details of the reported person (or persons) as far as known;
- any other persons who may report the reported facts;
- contact details (i.e.: telephone number and e-mail address);
- Audio (for voice signals);
- in general, the data provided by the Whistleblower to represent alleged unlawful conduct of which he has become aware (e.g. documents, audio, video, photographs).

In addition, always for the purposes of managing the report, the Data Controller may become aware of data of a particular nature pursuant to art. 9 of the GDPR, and data related to criminal convictions, pursuant to Art. 10 of the GDPR.

4. Methods of processing

The data are collected, in compliance with the rules in force, by means of electronic, telematic and manual tools, with logics closely related to the purposes indicated above, so as to guarantee the security and confidentiality of the data. In particular, they shall be collected by the following means:

- In writing: through the online platform provided by a selected external provider that adopts a system of reporting of corporate wrongdoing compliant with the Directive (EU) 2019/1937, guaranteeing the security and protection of data as well as the confidentiality of information, through an advanced system of encryption of communications, in line with what is required by the reference legislation.
- In oral form: through the recording of voice message within the dedicated section on the online platform.

Specific technical and organisational measures, such as encryption and specific protocols, are adopted in accordance with art. 32 GDPR, to ensure the protection of the identity of data subjects, as well as the possible anonymity of the informer and complete anonymity in accessing the platform (no log).

The data collected by means of electronic/telematic tools will not be subject to fully automated processing as specified in art. 22 GDPR.

5. Retention period of personal data

The alerts and related documentation shall be kept for as long as is necessary to process the alert, but no longer than five years from the date of communication of the final outcome of the alert procedure. In compliance with confidentiality obligations.

6. Data recipients

For the purposes mentioned above, the personal data provided may be made accessible only to those who are competent to receive and follow up the analysis, investigation and management of reports and any subsequent actions.

These entities have been expressly authorised and appropriately instructed to carry out the processing operations within the scope of the above activities.

The data may also be processed by external consultants and third parties with technical functions (for example, the platform provider), who act as Data Processors and have signed a specific contract that regulates the processing entrusted to them and the obligations regarding data protection and security of processing pursuant to art. 28 of the GDPR.

Finally, personal data may also be transmitted to other autonomous subjects of the treatment, based on legal or regulatory rules (e.g. public authorities, judicial authorities, etc.).

The updated list of recipients of data can be requested from the Controller by writing to the e-mail address indicated in paragraph 1.

7. The rights of the data subject

At any time, you will be able to have full clarity on the transactions we have reported to you and exercise your rights under articles. 15 et seq. of the GDPR. You may at any time, in accordance with the procedures and limits laid down by the above legislation:

- a) right of access (Art. 15 of the GDPR);
- b) right of rectification (art. 16 of the GDPR);
- c) right to erasure (Art. 17 of the GDPR);
- d) right to restriction of processing (Art. 18 of the GDPR);
- e) right to data portability (Art. 20 of the GDPR);
- f) right to object (Art. 21 of the GDPR);
- g) the right not to be subject to a decision based solely on automated processing, including profiling (Art. 22 of the GDPR).

The above rights may be exercised against the Data Controller by writing to the e-mail address indicated in paragraph 1 above.

In the event that the exercise of the above rights may result in an actual and concrete prejudice to the protection and confidentiality of the personal data of the reporting person, the Controller may limit, delay or exclude such exercise, pursuant to art. 2-undecies, co. 1, lett. f) of the Privacy Code (D.Lgs. 196/2003), and not to give follow-up to the request. In such cases, the rights of the data subject pursuant to art. 2-undecies, co. 3 of the Privacy Code, may be exercised through the Guarantor with the modalities set out in art. 160 of the Privacy Code.

8. Right of complaint

Should you believe that the processing of your personal data is carried out in breach of the provisions of current legislation, you have the right to lodge a complaint with the Supervisory Authority, as provided by art. 77 of the GDPR, or to make a claim in the appropriate judicial offices, pursuant to art. 79 del GDPR.