






<b>INFORMATION ON THE PROCESSING OF PERSONAL DATA</b>	
<p><b>PREMISE</b></p> 	<p>The sending of a relevant report pursuant to d.lgs. 24/2023 on whistleblowing, through the channels provided by the Company, involves the subsequent acquisition of a series of information, contained in the report or in any attached documentation. This information, necessary for the management of the report, may include personal data, in some cases, also belonging to particular categories of personal data or data relating to criminal convictions and offenses.</p> <p>In accordance with the provisions of current legislation and the Organization, Management and Control Model adopted by Phoenix Technology S.r.L., the Company undertakes to guarantee the confidentiality of the identity of the Whistleblower, also through disciplinary and contractual sanctions against those who violate the measures to protect the whistleblower. It is also recalled that:</p> <ul style="list-style-type: none"> <li>- the law protects the Reporter from acts of retaliation and discrimination, direct and indirect, directly or indirectly linked to the report;</li> <li>- Disciplinary sanctions may be applied against persons who make reports with intent or gross negligence that prove to be unfounded.</li> </ul> <p>To guarantee the Reporter, the Company has appointed the Whistleblowing Officer to manage the reports transmitted through the established channels.</p>
<p><b>DATA CONTROLLER AND CONTACT DETAILS</b></p> 	<p><b>Phoenix Technology S.r.L.</b></p> <p>privacy@photec.it</p> <p>Via Gradasso 36 - 48014 - Castel Bolognese (RA)</p>
<p><b>DATA PROTECTION OFFICER AND CONTACT DETAILS</b></p> 	<p><b>SGS Italia S.p.A.</b></p> <p>ssc@sgsitalia.postecert.it</p> <p>Via Caldera 21 - 20153 Milano</p>
<p><b>CATEGORIES AND TYPES OF DATA COLLECTED AND PROCESSED</b></p>  <p><b>NATURE OF DATA PROVISION</b></p> 	<p>The Data processed by the Company may include:</p> <p>The receipt and management of reports may involve the processing of:</p> <ul style="list-style-type: none"> <li>■ <b>COMMON PERSONAL DATA</b> (e.g. name, surname, contact details, job role, etc.),</li> <li>■ <b>depending on the content of the report</b> and / or the <b>attached documents</b>, possibly of <b>DATA belonging to SPECIAL CATEGORIES of data</b> (eg data relating to health conditions, sexual orientation or trade union membership, pursuant to art. 9 GDPR) and / or <b>data relating to criminal convictions and offenses</b> (pursuant to art. 10 GDPR).</li> </ul> <p>Each Whistleblower is responsible for independently deciding which personal data to communicate. The more details you provide with the report, the better your chances of correctly evaluating the content of the report.</p>



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<p><b>LEGAL BASIS OF PROCESSING</b></p>  <p><b>PURPOSE OF THE PROCESSING</b></p> 	<p><b>BASED ON LEGAL OBLIGATIONS</b> (Arts. 6.1.c, 9.2.b and 10 GDPR)</p>  <p><b>IN SOME CASES SUBJECT TO CONSENT</b> (Art. 6.1.a and 9.2.a GDPR)</p>  <p><b>IN THE CONTEXT OF LEGITIMATE INTERESTS</b> (Art. 6.1.f GDPR)</p> 	<p>The legal basis of the processing is given by the need to fulfill a legal obligation to which the data controller is subject pursuant to art. 6.1.c GDPR and possibly 9.2.b GDPR and 10 GDPR. The personal data communicated will in fact be used by Phoenix Technology S.r.L. to manage the report, in accordance with the provisions of current legislation.</p> <p>In the following cases, the processing may take place only in the presence of a valid consent expressed by the reporting person pursuant to art. 6.1.a GDPR and 9.2.a GDPR:</p> <ul style="list-style-type: none"> <li>• where it is necessary to disclose the identity of the reporting person and any other information from which this identity can be deduced, directly or indirectly, to persons other than those competent to receive or follow up on the report (pursuant to Article 12 paragraph 2 of Legislative Decree 24/2023);</li> <li>• in the event that knowledge of the identity of the reporting person is essential for the defense of the accused in the event of a disciplinary dispute based in whole or in part on the report (pursuant to Article 12 paragraph 5 d.l.s. 24/2023);</li> <li>• in the case of reporting made by means of a recorded telephone line or other recorded voice messaging system, to proceed to document the report, by recording on a device suitable for storage and listening or by full transcription (pursuant to Article 14 paragraph 2 of Legislative Decree 24/2023);</li> <li>• in the case of a report made orally during a meeting with the staff, to proceed to document the report, by recording on a device suitable for storage and listening or by means of a report (pursuant to Article 14 c. 4 of Legislative Decree 24/2023).</li> </ul> <p>It should be noted that the data provided, in particular cases, could also be processed for:</p> <ul style="list-style-type: none"> <li>• fulfill additional obligations under current laws (compared to those provided for in the field of whistleblowing), regulations or community legislation, or satisfy requests from the authorities. The legal basis of the processing is the obligation for the Data Controller to comply with the binding legislation pursuant to art. 6.1.c GDPR and 9.2.b GDPR;</li> <li>• needs to defend the rights of the Data Controller in the context of any disputes, including in court. The legal basis of the processing is constituted by the legitimate interest of the Data Controller to protect its rights pursuant to art. 6.1.f GDPR.</li> </ul>
<p><b>WHO HAS ACCESS TO THE DATA AND WITH WHOM IT IS SHARED</b></p> 	<p>To protect the Reporter, only the Whistleblowing Officer is authorized to manage the reports. It is required to keep the identity of the Reporter confidential.</p> <p>However, it should be noted that the processing of data could in any case involve management by:</p> <ul style="list-style-type: none"> <li>- subjects who typically act as data processors pursuant to art. 28 GDPR, as they cooperate with the Company for the pursuit of the purposes of the processing, duly bound to confidentiality;</li> <li>- persons authorized by the Company, pursuant to art. 29 GDPR, to the processing of data necessary to carry out activities strictly related to the provision of services, duly bound to confidentiality;</li> </ul>	

	<p>- subjects, bodies or authorities to whom it is mandatory to communicate the data by virtue of legal provision or orders of the authorities.</p>	
<p><b>INTERNATIONAL DATA TRANSFER</b></p> 	<p>As part of this processing, no international data transfers are envisaged. Based on the report received, there may be a need to transfer data outside the EEA. In this case, any transfer of data to countries outside the EEA will take place in accordance with one of the methods permitted by current legislation.</p>	
<p><b>HOW YOUR DATA IS PROTECTED</b></p> 	<p>The Company implements appropriate organizational and technical measures to protect the Data against unauthorized, accidental or unlawful acts of destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing.</p> <p>These security measures have been implemented considering the state of the art of the technology, their cost of implementation, the risks presented by the processing and the nature of the Data, with particular attention to sensitive ones. In particular, adequate awareness, confidentiality and training commitments are in place to ensure that the Data is not shared with or disclosed to unauthorized persons.</p>	
<p><b>HOW LONG THE DATA IS STORED</b></p> 	<p>The Data will be kept only for the time necessary to achieve the purposes of the processing, respecting the principles of limitation of conservation and minimization defined in Art. 5.1, letters c) and e) of the GDPR.</p> <p>It should be noted that:</p> <p>As for the data processed to fulfill legal obligations, they will be kept until the time provided for by the specific obligation or applicable law (for the management of the report, no later than five years from the date of communication of the final outcome of the reporting procedure pursuant to Article 14 paragraph 1 of Legislative Decree 24/2023);</p> <p>as for the data processed for the purpose of defending the rights of the Data Controller, not beyond what is provided for and permitted by Italian law to protect its interests.</p> <p>When the aforementioned reasons for processing cease, the Data will be anonymized, deleted or destroyed.</p>	
<p><b>RIGHT OF DATA SUBJECT</b></p> 	<p>Each Data Subject may exercise the following rights defined in Articles 15-22 GDPR by sending a written request to the Company to the aforementioned contact details.</p>	<p><b>Access:</b> the Data Subject can obtain information regarding the processing of his Data and a copy of the same.</p> <p><b>Erasure:</b> the Data Subject may request the cancellation of his data, within the limits permitted by law.</p> <p><b>Opposition:</b> the Data Subject may oppose the processing of Data, for reasons related to his particular situation.</p> <p><b>Rectification:</b> if the Data Subject considers that his Data are inaccurate or incomplete, he may request that they be modified accordingly.</p> <p><b>Limitation:</b> the Data Subject may request the limitation of the processing of his Data.</p> <p><b>Data portability:</b> the Data Subject can obtain a return of the Data or, where technically feasible, their transfer to a third party.</p> <p><b>Propose a complaint to the Supervisory Authority:</b> the Data Subject always has the right to lodge a complaint with the Guarantor for the protection of personal data pursuant to art. 77 GDPR if you believe that the processing of your data is contrary to current legislation.</p>