










**PRIVACY NOTICE - WHISTLEBLOWING**

	<p><b>A. DATA CATEGORIES:</b> The subject of processing may include your personal data such as identification, demographic, contact information, job-related data, and any additional information related to unlawful conduct and involved individuals, as well as any other personal data contained within the report and/or attached supporting documentation.</p>
	<p><b>B. DATA CONTROLLER:</b> The data controller is <b>Technoprobe Spa</b>, located at <b>Via Cavalieri di Vittorio Veneto, 2 – 23870 Cernusco Lombardone (LC)</b>, VAT Number <b>02272540135</b>, reachable by phone at 039.999251 or via email at <a href="mailto:privacy@technoprobe.com">privacy@technoprobe.com</a>.</p>
	<p><b>C. SOURCE OF PERSONAL DATA:</b> Personal data held by the Controller is collected directly from the data subject. Subsequently, the Controller may collect additional data during the investigation phase.</p>
	<p><b>D. PURPOSE OF DATA PROCESSING AND LEGAL BASIS:</b> The Controller processes personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>• <b>Purposes connected to legal obligations under Legislative Decree 24/2023</b> concerning the <i>protection of individuals reporting violations of Union law and national regulations</i>. Personal data is processed as part of the "whistleblowing" management exclusively for the purposes of investigation and verification of the reported facts and the undertaking of any related actions.</li> <li>• Purposes based on explicit <b>consent</b> to communicate personal data to a third party other than the recipient. Consent may be required at a later time if necessary.</li> </ul>
	<p><b>E. RECIPIENTS OF DATA:</b> Within the limits relevant to the purposes, your data may be shared with the Supervisory Body; the National Anti-Corruption Authority; the ordinary judicial authority or the accounting judicial authority, in cases provided by regulations. Additionally, subject to the adoption of measures ensuring the confidentiality of the whistleblower's identity and any additional elements of the report, with companies providing IT services enabling the operation of IT tools for reporting, duly appointed as data processors under Article 28 GDPR; other entities connected to processing activities; public and private entities due to legal obligations; legal firms or other qualified professionals for the study and resolution of legal issues; trade unions as provided by law and contract; and further entities instrumental to the achievement of the aforementioned purposes. Your data will not be subject to dissemination.</p>
	<p><b>F. TRANSFER OF DATA TO THIRD COUNTRIES:</b> The collected data will not be subject to transfer to third countries outside the European Economic Area.</p> <p>The collected data may be communicated to natural and/or legal persons belonging to the same business group as the Data Controller, based on an adequacy decision by the Commission or in the presence of appropriate safeguards, if necessary for the management of the report.</p>
	<p><b>G. RETENTION PERIOD:</b> The collected data will be retained for a period necessary for the processing of the report and in any case not exceeding five years from the date of communication of the final outcome of the reporting procedure. Periodic verification of data obsolescence in relation to the purposes for which they were collected is conducted.</p>
	<p><b>H. RIGHTS OF THE DATA SUBJECT:</b> The rights specified in Articles 15 to 22 of Regulation (EU) 2016/679 can be exercised within the limits of Article 2-undecies of Legislative Decree 30 June 2003, no. 196, which is hereby referred to.</p>
	<p><b>I. OBLIGATION TO PROVIDE DATA:</b> Providing personal data is not mandatory. However, failure to provide it may affect the investigation of the report.</p>

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**J. DATA PROCESSING METHODS:** The data subject has access to two/three reporting channels: one/two internal and one external channel provided by the National Anti-Corruption Authority, to be used as a residual channel/within specific conditions under Article 6 Legislative Decree 24/2023 (reference is made to the Whistleblowing procedure).

**Internal reporting channel** through the Parrot Whistleblowing platform: The use of the channel ensures adequate measures to guarantee the confidentiality of the reported information. The platform provider is unable to identify the reporting individual: the system does not save data from the devices used to make the report, such as IP address and browsing data, the communication channel is encrypted.

Therefore, data will be processed using computer tools, paper supports, and any other suitable type of support (e.g., cloud systems, storage systems, etc.), in compliance with appropriate technical and organizational security measures provided by the GDPR and current legislation on whistleblowing.



**K. DPO CONTACT DETAILS:** The Controller has appointed a Data Protection Officer (DPO), reachable via email at [dpo@technoprobe.com](mailto:dpo@technoprobe.com).



**L. AUTOMATED DECISION-MAKING:** No automated decision-making processes are envisaged.