

GIMET BRASS S.R.L.

Strada C n.8 Loc. San Zeno – 52100 Arezzo (AR)

VAT number 01755230511

Email: gimetbrass@gimetbrass.it



**Information on the Processing of Personal Data with reference to
"whistleblowing" – Reporting Entity**

INF-WB-S1

PURSUANT TO AND FOR THE PURPOSES OF ART. 13 OF EU REGULATION 2016/679

Premise

With this policy, GIMET BRASS S.R.L., as the Data Controller of Personal Data, wishes to inform you about the processing of your personal data necessary for the management of reports under whistleblowing legislation. This institution, recently updated in our legal system, guarantees that those who, whether they are employees, suppliers or professionals, report illegal conduct or irregularities of which they have become aware by virtue of their service relationship, enjoy specific protections.

In the following, we provide you with the information required pursuant to art. 13 of Regulation (EU) 2016/679 (hereinafter "Regulation" or "GDPR") concerning the processing of personal data of whistleblowers in accordance with Legislative Decree no. 24 of 10 March 2023, implementing Directive (EU) 2019/1937 of the European Parliament and of the Council, dated 23 October 2019.

1. PERSONAL DATA CONTROLLER

The Data Controller of Personal Data is the company GIMET BRASS S.R.L. with registered office in Strada C n.8 Loc. San Zeno, 52100 Arezzo (AR) in the person of the legal representative PAGLICCI MARIO.

Contacts: gimetbrass@gimetbrass.it Telephone: 0575 99394

2. CATEGORIES OF PERSONAL DATA

Personal data: *any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more characteristic features of its physical, physiological, genetic, psychic, economic, cultural or social identity (C26, C27, C30).*

GIMET BRASS S.R.L.

Strada C n.8 Loc. San Zeno – 52100 Arezzo (AR)

VAT number 01755230511

Email: gimetbrass@gimetbrass.it



Information on the Processing of Personal Data with reference to "whistleblowing" – Reporting Entity

INF-WB-S1

PURSUANT TO AND FOR THE PURPOSES OF ART. 13 OF EU REGULATION 2016/679

The common Personal Data referred to in art. 4, point 1, of the GDPR of the Whistleblower (in the case of non-anonymous Reports) as well as of any Persons involved or mentioned in the Report and Facilitators, as defined by the Whistleblowing Procedure.

The data subject of this processing is the "person involved": the natural person who reports illegible (art. 2, paragraph 1, letter l), of Legislative Decree no. 24/2023), i.e. the reporting person (so-called whistleblower).

3. SOURCE OF PERSONAL DATA

The source from which the personal data originates is the *report made by the reporting party (t. 3, paragraphs 3 and 4, of Legislative Decree no. 24/2023) and by other parties during the investigations.*

4. PURPOSE OF THE PROCESSING AND LEGAL BASIS

The Data Controller will process your personal identification data, in the event that the Report is not made anonymously, as well as information relating to the reported conduct and any additional data that you may provide, depending on the nature of the Report and the conduct complained of, or that are relevant in relation to the reported event. In addition, the Data Controller may process information collected during the necessary investigation activities aimed at verifying and resolving the Report for the following purposes:

at. Management of the Report, based on the whistleblower's complaint.

The Data Controller will use the data exclusively for purposes strictly necessary for the application and management of the reporting procedure. This includes verifying the facts that are the subject of the report, resolving it, preparing the finding, adopting any support or compensation measures for the whistleblowers, and instituting proceedings, including disciplinary proceedings.

The processing of data is necessary to comply with a legal obligation pursuant to Legislative Decree no. 24/2023, of which GIMET BRASS S.R.L. is subject. In fact, according to art. 2, letter g of

GIMET BRASS S.R.L.

Strada C n.8 Loc. San Zeno – 52100 Arezzo (AR)

VAT number 01755230511

Email: gimetbrass@gimetbrass.it



Information on the Processing of Personal Data with reference to "whistleblowing" – Reporting Entity

INF-WB-S1

PURSUANT TO AND FOR THE PURPOSES OF ART. 13 OF EU REGULATION 2016/679

Legislative Decree 24/2023, companies with more than 50 employees must implement internal reporting systems that allow the emergence of illegal conduct and guarantee the confidentiality and protection of whistleblowers from any retaliation, with the aim of encouraging the emergence and preventing situations harmful to the company (Article 2, paragraph 1, letters p) and q) of Legislative Decree 24/2023).

Therefore, the legal basis for the data processing is identifiable pursuant to art. 6, par. 1, letter c) of the General Data Protection Regulation (GDPR), which states that "the processing is necessary for compliance with a legal obligation to which the data controller is subject". The management of the report also includes all activities related to the Data Controller's obligation to provide updates on the status of the report itself.

5. METHODS OF PROCESSING PERSONAL DATA

The processing of personal data will be entrusted to the company Autem S.r.l., which has received specific training on the discipline of Whistleblowing and operates independently, thus ensuring independence and impartiality in the management of reports by S.R.L. The designated company may, subject to appropriate authorization, manage the reports with the exclusively operational support of the competent administrative offices. The data will be processed through the use of procedures, including computerized ones, equipped with encryption tools, to ensure the confidentiality of the identity of the whistleblower, the content of the reports and the related documentation. Appropriate technical and organisational measures will be taken to protect such information against unauthorised or unlawful access, as well as destruction, loss of integrity and confidentiality, including accidentally.

The previously mentioned IT platform, based on dedicated software, allows data to be stored on servers located within the territory of the European Union and is equipped with an encryption protocol

GIMET BRASS S.R.L.

Strada C n.8 Loc. San Zeno – 52100 Arezzo (AR)

VAT number 01755230511

Email: gimetbrass@gimetbrass.it



Information on the Processing of Personal Data with reference to "whistleblowing" – Reporting Entity

INF-WB-S1

PURSUANT TO AND FOR THE PURPOSES OF ART. 13 OF EU REGULATION 2016/679

that guarantees the separation of the identity of the whistleblower from the content of the report. Only when strictly necessary for verification activities or at the request of external authorities, the Whistleblower GIMET BRASS S.R.L. may, by providing adequate justification, associate the report with the identity of the whistleblower. In such circumstances, except in situations in which there may be liability for slander or defamation pursuant to the Criminal Code or art. 2043 of the Civil Code, and in cases where anonymity is not enforceable by law (such as in criminal, tax or administrative investigations, or in inspections by control bodies), the identity of the whistleblower will be protected at every stage following the report. In addition, all subjects of GIMET BRASS S.R.L. involved in the receipt or handling of the report are obliged to keep this information confidential.

6. COMMUNICATION OF PERSONAL DATA

For the purposes indicated in point 4.a., your personal data may only be accessible to the person responsible for managing reports, *Dr. Niccolò Paperini of the company Autem S.r.l.*, and, if necessary, to operational support structures duly trained and authorized through a specific act of appointment pursuant to art. 29 of the General Data Protection Regulation (R.G.P.D.). GIMET BRASS S.R.L. it may also communicate the personal data collected to third parties, if this is necessary for the pursuit of the purposes of the processing and on the basis of the same lawfulness conditions indicated above. The categories of third parties to whom the data may be disclosed include:

- National Anti-Corruption Authority (ANAC);
- Ordinary Judicial Authority;
- Judicial Police Forces.

These subjects will act as Independent Data Controllers.

7. TRANSFER TO NON-EU COUNTRIES

GIMET BRASS S.R.L.

Strada C n.8 Loc. San Zeno – 52100 Arezzo (AR)

VAT number 01755230511

Email: gimetbrass@gimetbrass.it



Information on the Processing of Personal Data with reference to "whistleblowing" – Reporting Entity

INF-WB-S1

PURSUANT TO AND FOR THE PURPOSES OF ART. 13 OF EU REGULATION 2016/679

Personal Data collected, processed and stored by GIMET BRASS S.R.L. will not be transferred outside the Economic Area of the European Union in any way.

8. RETENTION OF PERSONAL DATA

Your Personal Data are stored for the time strictly necessary for the processing of the report and, *in any case, no longer than 5 years from the date of communication of the final outcome of the reporting procedure (Article 14 of Legislative Decree No. 24/2023).*

In the event that a trial is instituted, the aforementioned term is extended until the exhaustion of the levels of judgment.

Personal data that is manifestly not useful for the processing of a specific report is not collected or, if collected accidentally, is deleted immediately.

9. NATURE OF THE PROVISION

The provision of Personal Data is necessary to allow the Data Controller to execute the obligations of the law in force Legislative Decree 24/2023.

10. RIGHTS OF THE DATA SUBJECTS

Whistleblowers have the right to request and obtain access from the organisation, in the cases provided for,

to your personal data and the rectification or erasure of the same or the restriction of processing concerning them or to object to the processing (Articles 15 et seq. of the GDPR), within the limits provided for

by art. 22 of Legislative Decree 24/2023 (Waivers and settlements). In any case, the possible exercise of other rights provided for by European and national law, with reference to art. 15-21 GDPR and Art. 2-undecies of the Code of Legislative Decree 196/2003 (as amended) is subject to exceptions and limitations to the exercise by the reported person.

GIMET BRASS S.R.L.

Strada C n.8 Loc. San Zeno – 52100 Arezzo (AR)

VAT number 01755230511

Email: gimetbrass@gimetbrass.it



**Information on the Processing of Personal Data with reference to
"whistleblowing" – Reporting Entity**

INF-WB-S1

PURSUANT TO AND FOR THE PURPOSES OF ART. 13 OF EU REGULATION 2016/679

How you can exercise your rights

Data subjects who wish to exercise their rights can send an e-mail to the ordinary e-mail address:

gimetbrass@gimetbrass.it or by paper mail to the registered office.

Data subjects who also believe that the processing of personal data relating to them carried out by the organization is in violation of the provisions of the Regulation, have the right to

lodge a complaint pursuant to art. 77 GDPR to the Data Protection Authority

personal (e-mail: protocollo@gpdp.it – www.garanteprivacy.it)

Last Updated

05/12/2023