

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF INDIVIDUALS REPORTING VIOLATIONS OF EU LAW OR NATIONAL LEGISLATION, INVOLVED INDIVIDUALS, MENTIONED INDIVIDUALS, AND FACILITATORS (WHISTLEBLOWING)

This information is provided by SOFTEAM S.p.A. in accordance with the Legislative Decree 196/2003 "Personal Data Protection Code" and subsequent amendments, and articles 13-14 of EU Regulation 2016/679 "General Data Protection Regulation" (hereinafter, GDPR). It describes the processing carried out through the reporting channel for illegal activities and irregularities introduced by art. 2 co. 1 L. 179/2017 (so-called "whistleblowing") and regulated, among others, by Legislative Decree 24/2023.

1. Data Controller

The Data Controller is the company SOFTEAM S.p.A., located at C.so Emanuele Filiberto, 16/A I – 23900 Lecco, represented by its legal representative pro tempore.

The Controller has identified an external entity with autonomy and independence as the manager of the whistleblowing process, located at the company's registered office.

2. Brief Description of Data Processing

TYPE OF COLLECTED DATA	PURPOSES OF PROCESSING	LEGAL BASIS	PERIOD AND PLACE OF RETENTION
<p>The processed data includes exclusively the personal data provided by the whistleblower and those communicated in the reports.</p> <p>Among the voluntarily provided data, the following personal information may be collected: name, surname, date of birth, place, tax code, residence, phone number, email address, etc., contained in the reports.</p>	<p>"a) management of the report made in accordance with Legislative Decree no. 24/2023;</p> <p>b) fulfillment of obligations provided by law or European regulations;</p> <p>c) defense or enforcement of one's own right in civil, administrative, or criminal litigation.</p>	<p>The legal basis for processing, with respect to the reported information, lies in the legitimate interest of the data controller and in the fulfillment of legal obligations under Legislative Decree no. 24/2023;</p>	<p>The processed personal data are stored in the systems for the time necessary for handling the report and, in any case, not exceeding five years from the date of communication of the final outcome of the reporting procedure. After this period, the data will be deleted unless their retention is required for other and different purposes provided for by specific legal provisions.</p> <p>Personal data that are evidently not useful for the processing of a specific report are not collected or, if collected accidentally, are promptly deleted</p>

3. Processing Methods

The personal data will be processed in accordance with the principles of fairness, lawfulness, transparency, protection of privacy, and the rights of the data subject, as established by Article 5 of EU Regulation 2016/679.

The Whistleblowing management system ensures, at every stage, the confidentiality of the identity of the Reporting Party, individuals involved and/or mentioned in the Report, the content of the Report, and its related documentation, except as provided for in Article 12 of Legislative Decree No. 24/2023."

4. Obligatory, Optional Nature, or Refusal of Data Provision

Providing personal data is not obligatory. The legislation allows the reporter who makes themselves recognizable to avail themselves of the protection measures provided by Legislative Decree 24/2023. However, users who choose not to provide their personal data can still submit anonymous reports.



5. Data Recipients

During the management of the report, personal data may be processed by internally designated individuals for the stated purposes, as well as by service providers or other external parties (e.g., managers of platforms used for report management), who will process the data as data processors on behalf of the data controller. Personal data may be transmitted to third parties when required by law (e.g., Judicial Authority, National Anti-Corruption Authority, etc.). Personal data will not be disclosed in any case.

6. Rights of the Data Subject

The data subject may exercise, at any time and in accordance with Legislative Decree 196/2003 and subsequent amendments and articles 15-22 of EU Regulation 2016/679, by contacting the Data Controller via email at privacy@softeam.it.

For example, the data subject has the right to:

1. Access their data to confirm whether processing is ongoing (art. 15 GDPR).
2. Verify and rectify their data (art. 16 GDPR).
3. Obtain erasure (Right to be forgotten) (art. 17 GDPR).
4. Obtain the limitation of processing (art. 18 GDPR).
5. Obtain data portability.
6. Object to data processing.
7. Lodge a complaint.
8. Object to automated decision-making, if applicable.
9. Withdraw consent at any time.

It is clarified that the person involved or mentioned in the report concerning their personal data processed within the reporting, public disclosure, or complaint cannot exercise the aforementioned rights.

7. Transfer of Data to Third Countries

For all the purposes indicated in this information, the personal common data of the data subject may be communicated to all companies belonging to the group, controlled, connected, etc., located both inside and outside the European Union, respecting the rights and guarantees provided by current legislation, after verifying that the country in question guarantees an "adequate" level of protection.

Personal data is not transferred to non-European third countries or international organizations.

The company also reserves the right to use cloud services, ensuring that service providers are selected from those providing adequate guarantees, as provided by art. 46 of EU Regulation 2016/679 "General Data Protection Regulation."

8. Privacy Information Amendment

The Data Controller reserves the right to modify, update, add, or remove parts of this privacy information at its discretion and at any time, providing notice.

Data Controller
SOFTEAM S.p.A.