






## INFORMATION ON THE PROCESSING OF PERSONAL DATA

Pursuant to Regulation (EU) 2016/679 and Legislative Decree 196/2003, as amended.




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|    | <p><b>BECAUSE THIS INFORMATION</b></p> <p>This information is provided in compliance with the provisions of EU legislation (EU Regulation 2016/679 of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, hereinafter, for brevity, "GDPR") and the relevant national legislation in force. The processed data will also be subject to the forms of protection expressed in Legislative Decree 196/2003 as amended by Legislative Decree 101/2018, Legislative Decree 51/2018 and Legislative Decree 24/2023 (in particular, see Article 13).</p> |  |
|    | <p><b>DATA CONTROLLER</b></p> <p>The data controller is La Lucentezza Srl, with registered office in Bari (BA), Via Della Costituente No. 19/E<br/>         - zip code 70125, (Email: <a href="mailto:privacy@lalucentezza.it">privacy@lalucentezza.it</a>, PEC: <a href="mailto:lalucentezzasrl@postecert.it">lalucentezzasrl@postecert.it</a>, Tel.: +39 0805380228).</p>   |  |
|   | <p><b>PURPOSE OF PROCESSING</b></p>   | <p>Personal data are processed and will be used for the activities necessary to ascertain any wrongdoing inherent in violations (as defined in Article 2 of Legislative Decree 24/2023) of national or European Union regulatory provisions that harm the public interest or the integrity of the public administration reported by individuals who have become aware of them in a work context.</p> <p>Specifically, the data will be processed for:</p> <ul style="list-style-type: none"> <li>• Issue the reporting person with an acknowledgement of receipt of the report within seven days from the date of receipt;</li> <li>• maintain interlocutions with the reporting person and to request additions from the reporting person, if necessary;</li> <li>• Diligently follow up on reports received;</li> <li>• provide acknowledgement of the report within three months from the date of the acknowledgement of receipt or, in the absence of such notice, within three months from the expiration of the seven-day period from the submission of the report;</li> <li>• Carry out the necessary investigative activities aimed at verifying the merits of the reported fact;</li> <li>• The adoption of consequent measures against the offending party.</li> </ul> |
|  | <p><b>LEGAL BASIS FOR PROCESSING</b></p>  | <p>The processing is carried out in compliance with a legal obligation (EU Reg. 2016/679 art 6 par.1 lett. c).</p> <p>Should the handling of the report involve the processing of particular categories of data, the same will be done as necessary for reasons of relevant public interest (EU Reg. 2016/679 art 6 par.1 lett.g).</p>   |
|  | <p><b>RETENTION PERIOD</b></p>  | <p>Reports, internal and external, and related documentation are retained for as long as necessary for their processing and in any case no longer than five years from the date of the communication of the final outcome of the reporting procedure. Personal data that are manifestly not useful for the processing of a specific report are not collected or, if accidentally collected, would be deleted immediately.</p>  |

The processing of your personal data will take place at the registered office of the owner. The data will be processed, exclusively for the above purposes. The processing will be carried out by automated (computer/electronic) and non-automated means (e.g., in the case of a report made by telephone without being recorded) with logics designed to ensure the confidentiality, integrity and availability of the data itself with particular regard to the identity of the reporting person, the person involved and the subjects otherwise mentioned in the report, as well as the content of the report and the related documentation.

It is specified that the identity of the reporting person and any other information from which the aforementioned may be inferred, directly or indirectly, may not be disclosed, without the express consent of the reporting person, to persons other than those competent to receive or follow up on reports.

In the special case of disciplinary proceedings, the identity of the reporting person may not be disclosed, where the disciplinary charge is based on investigations that are separate and additional to the report, even if consequential to the report. Where the charge is based, in whole or in part, on the report and the knowledge of the identity of the reporting person is indispensable for the defense of the accused, the report will be usable for the purposes of disciplinary proceedings only in the presence of the express consent of the reporting person to the disclosure of his or her identity. The same guarantees are placed on the reporting person and the individuals involved.

In the cases highlighted above, in which the consent of the interested party is required in order to proceed, the latter will be requested by a separate act, or through additional modalities appropriate for the purpose, in the event that the above conditions actually occur.

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|  | <p><b>NATURE OF CONFERMENT AND REFUSAL</b></p> <p>The provision of personal data is necessary for the purpose of sending a report, failure to provide the same will make it impossible to proceed with the same therefore, any refusal, even partial, or inaccurate indication of such data determines the impossibility for the Data Controller to properly execute the procedures inherent in the management of the report and all related obligations. With reference to the purposes for which consent is required, the provision of personal data is optional. Failure to provide it, however, will result in the impossibility of pursuing the aforementioned purposes.</p>  |
|  | <p><b>RECIPIENTS OF THE DATA</b></p> <p>The data may be disclosed to other entities, public or private, which by law or regulation are required to know or may know them.</p> <p>Also for the purposes indicated, the data may be processed by subjects who carry out instrumental activities for the Data Controller, who provide adequate guarantees regarding the protection of personal data and appointed as <b>Data Processors pursuant to Article 28 of EU Regulation 2016/679</b> (e.g., companies that provide IT solutions, also accessible online, functional to make usable a channel intended for sending reports).</p> <p>To know at any time the subjects to whom your data will be disclosed, simply request an updated list of them by writing to the Data Controller at the contact details above.</p> |
|  | <p><b>AUTHORIZED SUBJECTS</b></p> <p>The management of the reporting channel is entrusted to a dedicated autonomous internal subject or office with personnel specifically trained and authorized to handle reports. The authorized individuals shall operate with the use of appropriate security measures suitable for the pursuit of the purposes recalled in the dedicated section so as to:</p> <ul style="list-style-type: none"> <li>- Ensure the confidentiality of the users to whom the data relate;</li> <li>- Prevent undue access to information by third parties or unauthorized personnel.</li> </ul>   |



#### **RIGHTS OF DATA SUBJECTS - COMPLAINT TO THE SUPERVISORY AUTHORITY**

The rights referred to in Articles 15 to 22 of Regulation (EU) 2016/679 may be exercised within the limits of the provisions of Article 2-undecies of Legislative Decree No. 196 of June 30, 2003 for as amended by Legislative Decree 101/2018. These rights may be exercised by contacting the owner at the contact details indicated above.

Specifically in relation to the data being processed herein, it is Your right:

- at any time, request from the controller access to your personal data and information relating to them (Art. 15 of the GDPR); rectification of inaccurate data or supplementation of incomplete data (Art. 16 of the GDPR); deletion of personal data concerning you (upon the occurrence of one of the conditions indicated in Art. 17, par. 1 of the GDPR and in compliance with the exceptions provided for in par. 3 of the same article); the restriction of the processing of your personal data (upon the occurrence of one of the cases indicated in art. 18, par. 1 of the GDPR);
- at any time, request and obtain from the data controller - in cases where the legal basis of the processing is contract or consent, and the processing is carried out by automated means - your personal data in a structured, machine-readable format, including for the purpose of communicating such data to another data controller (so-called right to portability of personal data art. 20 GDPR);
- at any time, object to the processing of your personal data in the event of special situations concerning you (Article 21 of the GDPR).
- at any time, revoke consent, limited to cases where processing is based on your consent for one or more specific purposes. Processing based on consent and carried out prior to the revocation of consent retains, however, its lawfulness (Art. 7(3) GDPR).

If you believe that the processing of your data is taking place in violation of the provisions of the Regulation, you may lodge a complaint with a supervisory authority (Autorità Garante per la protezione dei dati personali - [www.garanteprivacy.it](http://www.garanteprivacy.it)), as provided for in Article 77 of the GDPR, or take legal action against the appropriate judicial venues (Article 79 of the GDPR).