



## ALUMINIUM EXTRUSIONS AND DRAWN PRODUCTS

ALUMINIUM SEMI-FINISHED EXTRUDED AND DRAWN PRODUCTS  
DEMI PRODUITS FILES ET ETIRES EN ALUMINIUM  
GEZOGENE UND GEPRESSTE HALBZEUGE AUS ALUMINIUM  
CALIBRATED AND EXTRUDED ALUMINIUM SEMIPRODUCTS

LEGAL HEAD OFFICE AND LOCATION: Via S. Andrea, 3 - 25038 Rovato (Brescia) Italy Part. IVA / VAT: 00566100988 - C.F.: 00481190171 R.E.A.C.C.I.A.Brescia:162925-Cap.Soc: € 10.000.000 Telephone 0307725011 (ric aut) Fax Customer Accounts Department 0307701228 - 0307702837 Fax Sales Office 0307701228 - 0307702847 Raccordo FF.SS. and Motorway Station: Rovato (BS)  
FOUNDRY:  
Via E. Mattei, 10 - 25026 Pontevedo (Brescia) Italy Tel. 0309307321 (aut.rece.) - Fax 0309930036 Motorway station: Pontevedo  
Website: www.eural.com - email: eural@eural.com

NS. REF. 15/01/01 1586	VS. REF.
---------------------------	----------

Rovato 29/05/2024

### INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATING TO WHISTLEBLOWING ACTIVITIES THROUGH INTERNAL CHANNELS (WHISTLEBLOWING) PURSUANT TO ART. 13 & 14 EU REG. 679/2016 AND LEGISLATIVE DECREE 196/2003 AND SUBSEQUENT AMENDMENTS

In order to conduct a fair and transparent processing, Eural Gnutti S.p.A. ("Company") - makes the following disclosure - drafted pursuant to Articles 13 and 14 of the EU Regulation 679/2016 on the "Protection of Individuals with regard to the Processing of Personal Data" ("GDPR") and Legislative Decree 196/2003 ("Privacy Code"), as amended by Legislative Decree 101/2018 - regarding the personal data collected and processed as part of the whistleblowing reporting procedure by means of the dedicated email segnalazioni.odv.eural@gmail.com.

#### 1. Data controller

The Data Controller is Eural Gnutti S.p.A. C.F.00481190171 /P.IVA00566100988 and registration number with the Brescia Chamber of Commerce Register of Companies no. 262925 - registered office in via Sant'Andrea 3, 25038, Rovato (BS), Italy - e-mail: eural@eural.com, and in the person of its legal representative pro tempore guarantees compliance with the regulations on the protection of personal data by providing the following information on the processing of the data communicated or otherwise collected.

#### 2. Purpose and method of processing, source of data

The sending, receipt and handling of reports may give rise to the processing of the following so-called *common* personal data: first name, surname, date and place of birth, address, e-mail address, telephone number, job position, department/sector, IP address, registration of activities on the site's dedicated page, date and time of interactions.

In addition, depending on the content of the reports and the documents that may be attached to them, to the processing of so-called *'special'* personal data (data relating to health conditions, sexual orientation or trade union membership, pursuant to Article 9 GDPR) and personal data *relating to criminal convictions and offences* (pursuant to Article 10 GDPR).

Personal data are acquired insofar as they are contained in the report and/or in any documents annexed thereto and may refer both to the reporting person and to other persons indicated as possibly responsible for the violations or, in any case, involved in various ways in the events reported.

The personal data communicated by the data subject will be collected and processed by computer and, if necessary, on paper for the purpose of managing the reporting procedure and any consequent actions that may result from it.

### **3. Purpose and legal basis of processing**

In compliance with the principles of lawfulness, fairness, transparency, appropriateness, relevance and necessity set out in Article 5(1) of the GDPR, the Data Controller will process the personal data provided when submitting a breach report for the following purposes:

- a. Receiving, investigating and handling the report;
- b. (only possible) Acquisition of signalling by voice recording;
- c. Preliminary investigation for possible subsequent measures (disciplinary or judicial action).

For the above-mentioned purposes:

- a. processing of 'common' data (with the exception of the item under b) below) is based on the fulfilment of a legal obligation to which the data controller is subject, pursuant to Article 6(1)(c) of the GDPR;
- b. the processing of 'special' data is based on the fulfilment of obligations and the exercise of specific rights of the data controller or the data subject in the field of employment law, pursuant to Article 9(2)(b) of the GDPR;
- c. the processing of data relating to criminal convictions or offences is based on the fulfilment of a legal obligation to which the controller is subject, pursuant to Article 6(1)(c) of the GDPR.

It is, in fact, the obligation of the Reporting Parties under Legislative Decree 24/2023 (i) to allow the persons entitled to report any violations of which they have become aware in the course of their employment; (ii) to maintain contact with the reporting parties; (iii) to follow up the reports properly; and (iv) to provide feedback on the reports.

The provision of personal data - common, special and/or relating to criminal convictions or offences - for these purposes is necessary and, without it, the report may be considered inadequately substantiated and/or unfounded.

### **4. Conservation period**

Pursuant to Article 14 of Legislative Decree 24/2023, internal and external reports and the related documentation are kept for the time necessary to process the report and, in any case, no longer than 5 (five) years from the date of the communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations and the principles set out in Article 5(1)(e) of the GDPR.

Personal data relating to investigations carried out and actions taken (disciplinary or judicial), will be kept for a maximum period of 10 (ten) years.

### **5. Data Communication**

In compliance with the protections envisaged by Legislative Decree 24/2023 and with particular regard to the protection of the confidentiality of the reporting party, the personal data of the data subjects will be processed exclusively by the staff and collaborators of the Data Controller - expressly appointed as data processors, pursuant to Article 29 of the GDPR and 2-quaterdecies of the Privacy Code - or by companies and professionals - expressly appointed as data processors, pursuant to Article 28 of the GDPR - which the Data Controller uses for the specific purposes set out in this notice.

More specifically, the personal data of data subjects may be communicated by the Controller exclusively to the following categories of recipients:

- a. Person(s) managing the internal reporting channel (Internal Manager, any sub-processors assisting the former, internal persons appointed as data processors);
- b. Data processors (consultants, accountants or other professionals providing functional services for the above purposes) - only in the event that disciplinary/judicial action follows the report;
- c. Persons who process data in execution of specific legal obligations;
- d. judicial or administrative authorities, for the fulfilment of legal obligations.

The personal data of the persons concerned will not under any circumstances be disseminated, i.e. they will not be disclosed to unspecified persons, in any form whatsoever, including by simply making them available or consulting them.

In any case, the identity of the reporting person and any other information from which this identity may be inferred, directly or indirectly, may not be disclosed without the express consent of the reporting person to persons other than those referred to in (a) above.

## 6. Data Transfer

Personal data collected will not be transferred to countries outside the European Union (so-called third countries).

## 7. Rights of data subjects

The GDPR guarantees data subjects some important rights that can be exercised vis-à-vis the data controller.

The rights granted to data subjects include those of:

- a. Ask the Data Controller for access to personal data and information relating to them (pursuant to Article 15 of the GDPR), the rectification of inaccurate data or the integration of incomplete data (pursuant to Article 16 of the GDPR), the deletion of personal data relating to them (upon the occurrence of one of the conditions indicated in Article 17(1) of the GDPR and in compliance with the exceptions provided for in paragraph 3 of the same article), or the restriction of the processing of personal data (upon the occurrence of one of the cases indicated in Article 18(1) of the GDPR);
- b. Withdraw consent at any time, limited to cases where the processing is based on consent for one or more specific purposes, without affecting the lawfulness of the processing based on the consent given before the withdrawal (ex Art. 13(2)(c) GDPR);
- c. To be informed without undue delay of any breach or unauthorised access by third parties to their systems containing personal data (so-called data breach - ex art. 34 GDPR);
- d. Make a complaint to a supervisory authority (Italian Data Protection Authority - [garanteprivacy.it](http://garanteprivacy.it)) (pursuant to Article 13(2)(d) of the GDPR).

Exclusions: Pursuant to Article 2-undecies of Legislative Decree 196/2003, it should be noted that the person involved and the person mentioned in the report, with reference to their personal data processed in the context of the report (as well as of a public disclosure or a complaint), cannot exercise the rights that the GDPR normally recognises for data subjects, as the exercise of such rights could result in actual and concrete prejudice to the protection of the confidentiality of the identity of the reporting person.

In such cases, therefore, the reported person or the person mentioned in the report is also precluded from addressing the Data Controller and, in the absence of a reply from the latter, from lodging a complaint with the Garante per la protezione dei dati personali if they consider that the processing that concerns them infringes these rights.

## 8. Timing and modalities of response in the event of exercise of the data subject's rights

Pursuant to Article 12 of the GDPR, the Data Controller will provide the data subject with information about the actions taken in relation to a request to exercise rights without undue delay and, in any event, within 3 (three) months of receipt of the request. If the data subject has submitted a request by electronic means, the information will be provided to him/her, where possible, by electronic means, unless he/she indicates otherwise.

The data controller is Eural Gnutti S.p.A. under the responsibility of the pro-tempore Legal Representative.

Legal Representative  
Paola Gnutti

