

PRIVACY POLICY
Regulation (EU) 2016/679

Disclosure to Data Subjects – Whistleblowing pursuant to art 6 of Legislative Decree no. 231/2001

Pursuant to and to the effects of articles 13 and 14 of Regulation (EU) 2016/679, the "General Data Protection Regulation," we inform you that Siav S.p.A. processes the personal data provided and freely disclosed by you.

Siav S.p.A. guarantees that your personal data is processed with respect for fundamental freedoms and rights, as well as for your dignity, with particular reference to confidentiality, personal identity, and the right to the protection of personal data.

1. Purposes of the processing of personal data (Art. 13.1.c, Regulation (EU) 2016/679)

All the personal data of the data subjects, and where applicable the data belonging to special categories pursuant to art. 9 of the EU Regulation or relating criminal convictions and offences pursuant to art. 10 of the EU Regulation, are processed by the Controller on the basis of one or more of the following conditions for lawfulness:

- compliance with obligations provided for by law, rules, and EU regulations, and for the performance of institutional functions (article 6.1.c, Regulation (EU) 2016/679);
- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject (article 9.2.b, Regulation (EU) 2016/679).

The following is a list of the purposes for which the data subject's personal data will be processed:

- entry into the corporate computer databases and registries dedicated to whistleblowing;
- complete management of the proceedings relating to the reporting of unlawful conduct in compliance with the relevant regulations in force;
- for the transmission of the result of the verification for investigatory analyses or for the adoption of the relevant measures by the supervisory Body and/or by the Compliance Office if, at the outcome of the verification, elements of non-manifest lack of foundation of the reported event are recognized. In these cases, the following documentation may be transmitted using the following link <https://siav.integrityline.com/>
 - or by sending a letter to the address SIAV SPA VIA ROSSI 5N 35030 RUBANO, PADOVA indicating on the envelope "RESERVED FOR THE COMPLIANCE FUNCTION" if the report concerns a member of the OdV
 - Or, in all other cases, by sending a letter to the address GALLERIA BRANCALEON 2 35137 PADOVA to the attention of Dr. Silvia QuagliaThe names of the members of OdV and the name of the person holding the position of Compliance Function are indicated on the company website.
- defence in court of a right of the controller;
- collaboration with the Judicial Authority;
- meeting specific requests of the data subject.

2. Personal data processing procedures

Your personal data shall be processed at the main office and at the offices of the Controller, or, should it be necessary, c/o the parties indicated in paragraph 4 below, using both hardcopy and computer media, both by telephone and telematically, also through the use of automated tools suitable for storing, managing, and transmitting these data, with observation of every precautionary measure guaranteeing the security and confidentiality thereof.

The processing shall be done in such a way as to reduce to a minimum the risk of destruction or loss, of unauthorized access, and of processing not in keeping with the purposes for which the data were collected. Your personal data are processed:

- in keeping with the principle of minimization pursuant to articles 5.1.c and 25.2 of Regulation (EU) 2016/679;
- lawfully and fairly.

Your data:

- are collected for explicit and legitimate determined purposes;
- are exact, and are updated if necessary;
- are pertinent, complete, and not excessive in relation to the purposes of the processing.



3. Nature of the collection and consequences of failure to confer the personal data (Art. 13.2.e, Regulation (EU) 2016/679)

The conferral of your personal data is mandatory for the purposes stated in paragraph 1 above. Failure to confer the data will result in undelivered or improperly performed service, and the non-fulfilment of legal obligations.

Your data are stored at the offices of Siav S.p.A. and with external keepers. If necessary, your data may also be stored by the other parties indicated in paragraph 4.

4. Disclosure and dissemination of personal data (Art. 13.1.e, Regulation (EU) 2016/679)

If necessary, your personal data may be disclosed (with this term to be understood as making them known to one or more determinate parties), to:

- parties whose ability to access the data is recognized by provisions of law and by secondary and EU regulations;
- the competent bodies and departments of the Company, so that they might adopt any additional measures and/or actions deemed necessary, also for the Controller's protection;
- suppliers, including the Data Protection Officers designated pursuant to art. 28 of Regulation (EU) 2016/679, that act on the Controller's behalf;
- The collected personal data are also processed by the Controller's personnel such as the Supervisory Body and Compliance Office, acting on the basis of specific instructions provided as to the purposes and procedures for the processing against which the whistleblower's right to anonymity cannot be raised

Your personal data are in no case disseminated (with this term to be understood as making them known in any way to a plurality of indeterminate parties), without prejudice to the obligations of law.

5. Personal data controller (Art. 13.1.a, Regulation (EU) 2016/679)

The Personal Data Controller is Siav S.p.A. At present, all information relating to the Controller, along with the updated list of designated Officers and system Administrators, is available at the Main office of Siav S.p.A. Via Rossi 5N 35030 Rubano, Padua. Certified e-mail: siav@pec.siav.it

Data Protection Officer (DPO) (Art. 13.1.b Regulation (EU) 2016/679)

The Data Protection Officer identified by the entity is the following:

DPO	VAT registration no.	Address	Postal code	Municipality	Contact
LTA Srl	14243311009	Via della Conciliazione, 10	00193	Rome	Luigi Recupero

The Data Protection Officer is available at the main office of SIAV Spa at Via Rossi, 5/n - 35030 Rubano (Padua). In the event of written applications/communication to be sent digitally, the Data Protection Officer may be reached via the SIAV Spa contacts listed at www.siav.com/it.

6. Criteria used to determine the period for which the data will be stored (Art. 13.2.a, Regulation (EU) 2016/679)

The data subject's personal data subject to processing shall be stored for the period necessary to comply with the storage periods established by law, and at any rate no longer than the time necessary for the management of the activities and for the management of reports of the violation.

The storage term will be 5 (five) years from the closure of the report (art.14 Legislative Decree 24/2023)

7. Rights of the data subject (Art. 13.2.b, Regulation (EU) 2016/679)

You are informed that, at any time, the data subject may exercise:

- the right to obtain from the controller, pursuant to Art. 15, Reg. 679/2016/UE, access to personal data concerning him or her;



- the right to obtain from the controller, pursuant to Art. 16, Reg. 679/2016/UE, the rectification of personal data concerning him or her, where this does not conflict with the regulations in force on the storing of these data;
- the right to obtain from the controller, pursuant to Art. 17, Reg. 679/2016/UE, the erasure of personal data concerning him or her, where this does not conflict with the regulations in force on the storing of these data
- the right to obtain from the controller, pursuant to Art. 18, Reg. 679/2016/UE, restriction of processing of personal data concerning him or her;
- right to object to processing, pursuant to Art. 21, Reg. 679/2016/UE.

The rights may be exercised pursuant to Article 13 paragraph 3 of Legislative Decree 24/2023 within the limits of Article 2 undecies of Legislative Decree 196/03

8. Right to lodge a complaint (Art. 13.2.d, Regulation (EU) 2016/679)

The data subject is informed that he or she has the right to lodge a complaint with a supervisory authority (in particular, Autorità Garante per la protezione dei dati personali italiana: www.garanteprivacy.it).

9. Source from which the data originate (Art. 14 Regulation (EU) 2016/679)

The personal data that were not obtained from the data subject were acquired as a matter of course from the Controller or third parties.