

PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA

Rotair S.p.a. provides, below, information on the processing of personal data carried out in relation to the management of reports, governed by the Whistleblowing Procedure.

1. DATA CONTROLLER

The data controller is Rotair S.p.a. with registered office at Via Bernezzo, 67 – 12023 Caraglio (CN), VAT Number 00210890042.

2. PURPOSE OF PROCESSING AND SOURCE OF PROCESSED DATA

The personal data processed are:

- Personal data of the reporter (in the case of non-anonymous reports), such as: personal details (e.g., name, surname, date, and place of birth), contact details (e.g., landline and/or mobile phone number, postal address/email).
- Personal data and information about the reported party, as well as any individuals involved or mentioned in the report.

3. PURPOSES AND LEGAL BASIS OF PROCESSING

Personal data provided by you are processed by the data controller for the following purposes: a. Receipt, handling, and subsequent management of the report made under Legislative Decree No. 24/2023, received according to the provisions of the Whistleblowing policy. b. Fulfillment of obligations required by law or EU regulations The legal basis for processing is the fulfillment of a legal obligation to which the data controller is subject (Article 6, paragraph 1, letter c) of the GDPR). The provision of data is necessary to achieve the aforementioned purposes; failure to provide, partial, or inaccurate provision may result in the impossibility of managing the report.

4. PROCESSING METHODS AND DATA RETENTION

Data processing and storage may take place at the operational offices of the data controller or in any other location where the parties involved in the processing are located. Data processing is carried out manually and/or through automated computerized and telematic tools with logic related to the aforementioned purposes and, in any case, in such a way as to guarantee their security and confidentiality. The Whistleblowing management system ensures, at every stage, the confidentiality of the identity of the reporter, individuals involved and/or mentioned in the report, the content of the report, and related documentation, except as provided in Article 12 of Legislative Decree No. 24/2023. The management of reports is entrusted to an internal committee with autonomous powers of initiative and control and specifically authorized to process personal data, in the persons of Lorella Donadio and Luca Degiovanni. The data controller retains personal data as provided for in Article 14 of Legislative Decree No. 24/2023, i.e., for the time necessary for the processing of the report and in any case not beyond 5 years from the date of communication of the final outcome of the report. Personal data that is manifestly not useful for the processing of a specific report is not collected or, if collected accidentally, promptly deleted.

5. DISCLOSURE AND COMMUNICATION OF DATA

To achieve the aforementioned purposes, the personal data provided may only be made accessible to those who are competent to receive or follow up on activities of analysis, investigation, and management of reports and any resulting actions. These subjects are adequately instructed to avoid loss, access to data by unauthorized persons, or unauthorized processing of the data itself, and, more generally, in relation to obligations regarding the protection of personal data. Finally, personal data may also be transmitted to other independent data controllers, based on laws or regulations (e.g. Public Authorities, Judiciary, etc.). The identity of the reporting person and any other information from which their identity can be directly or indirectly inferred may be disclosed to individuals other than those competent to receive or follow up on reports only with the express consent of the reporting person in accordance with Legislative Decree No. 24/2023.

6. DATA TRANSFER

The data controller does not transfer personal data to third countries or international organizations. However, it reserves the right to use cloud services; in this case, service providers will be selected from those who provide adequate guarantees.

7. RIGHTS OF THE DATA SUBJECT

Under GDPR 2016/679, the data subject has the right of access (Article 15), right to rectification (Article 16), right to erasure (Article 17), right to restriction of processing (Article 18), right to data portability (Article 20), right to object (Article 21), right to object to automated decision-making (Article 22), right to lodge a complaint with the supervisory authority of the state of residence (Article 77). In order to exercise their rights, the data subject can contact the data controller specifying the subject of their request and the right they intend to exercise at the following email address: info@rotairspa.com

8. AUTOMATED DECISION-MAKING PROCESSES

The data controller does not carry out processing consisting of automated decision-making on the data.