



OFFICINE AMBROGIO MELESI & C. S.R.L.

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Cap.Soc./Share Cap. €500.000 i.v.
P.IVA - C.F. - R.I. Lecco:
IT 00231630138
R.E.A. n. LC-108835
N.Mecc./Export n. LC005895



INFORMATION ON THE PROCESSING OF PERSONAL DATA OF PERSONS REPORTING VIOLATIONS OF EUROPEAN UNION LAW OR NATIONAL REGULATORY PROVISIONS, PERSONS INVOLVED, PERSONS MENTIONED AND FACILITATORS (WHISTLEBLOWING)

This information is provided by **OFFICINE AMBROGIO MELESI & C. S.r.l.** pursuant to and for the purposes of Legislative Decree 196/2003 "Code regarding the protection of personal data" and subsequent amendments and additions and articles 13 - 14 of EU Regulation 2016/679 "European Regulation on the protection of personal data" (for simplicity hereinafter, GDPR) describes the processing carried out starting from the reporting channel of violations of offenses and irregularities introduced by art. 2 co. 1 L. 179/2017 (so-called "L. "whistleblowing") is regulated, among others, by Legislative Decree 24/2023.

1. Data Controller and Whistleblowing Manager

The Data Controller is the company **OFFICINE AMBROGIO MELESI & C. S.r.l., with registered office in Largo De Vecchi 11 – 23813 Cortenova (LC) in the person of its pro tempore legal representative.**

The person in charge

The Data Controller has identified an external third party identified, with characteristics of autonomy and independence, as the manager of the whistleblowing management process governed by the Whistleblowing Procedure, based at the Company's registered office.

2. Data Protection Officer

OFFICINE **AMBROGIO MELESI & C. S.r.l.** has appointed the "data protection officer" provided for by the Regulation (so-called DPO) in the company SSA SERVIZI S.r.l.. For all matters relating to the processing of your Personal Data and/or to exercise the rights provided for by the Regulation itself, you can contact the DPO at the following email addresses: gdpr@melesi.it.

3. Brief description of data processing

TYPE OF DATA COLLECTED	PURPOSE OF THE PROCESSING	LEGAL BASIS	PERIOD AND PLACE OF STORAGE
The data processed are exclusively the personal data provided by the whistleblower and those communicated in the reports. Among the data provided voluntarily, the following personal data may be acquired: name, surname, date of birth, place, tax code, residence, telephone number, e-mail address, etc., contained in the reports.	a) management of the Report carried out pursuant to Legislative Decree n. 24/2023; b) fulfilment of obligations provided for by law or EU legislation; c) defence or assertion of a right in civil, administrative or criminal litigation.	The legal basis of the processing lies, with respect to the report made, in the legitimate interest of the data controller and in the fulfilment of legal obligations pursuant to Legislative Decree n. 24/2023;	The personal data processed are stored on the systems for the time necessary to manage the report and in any case no longer than five years from the date of communication of the final outcome of the reporting procedure. After this period, the data will be deleted, unless it is necessary to store them for other and different purposes provided for by express provision of law Personal data that is clearly not useful for the processing of a specific report is not collected or, if collected accidentally, is deleted promptly.



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4. Processing methods

Personal data will be processed in accordance with the principles of correctness, lawfulness, transparency, protection of confidentiality and the rights of the Data Subject, in accordance with the provisions of art. 5 of EU Regulation 2016/679. The Whistleblowing System guarantees, at every stage, the confidentiality of the identity of the Whistleblower, of the Persons involved and/or otherwise mentioned in the Report, of the content of the Report and of the related documentation, without prejudice to the provisions of art. 12 of Legislative Decree no. No. 24/2023.

5. Mandatory, optional nature or refusal to provide data

The provision of personal data is not mandatory: the legislation provides that the whistleblower who makes himself recognizable will be able to make use of the protection measures provided for by Legislative Decree 24/2023. However, if you do not make your personal data available, you may still submit anonymous reports.

6. Recipients of the data

During the management of the report, personal data may be processed by internal figures specifically authorized for the purposes indicated, as well as by service providers or other external parties (e.g. managers of platforms used for the management of reports), who will process the data as data processors on behalf of the undersigned. If the details are met, the personal data may be transmitted to third parties to whom the communication is required by law (e.g. Judicial Authority, National Anti-Corruption Authority, etc.). Under no circumstances will personal data be disseminated.

7. Rights of the Data Subject

At any time, the Data Subject may exercise pursuant to Legislative Decree 196/2003 and subsequent amendments and amendments and articles 15 to 22 of EU Regulation 2016/679 by contacting the Data Controller, by writing to the DPO | DPO at gdpr@melesi.it.

By way of example, you have the right, at any time, to request, where applicable, to:

1. Access your data to confirm whether or not your data is being processed (art. 15 of EU Regulation 2016/679)
2. Verify and rectify your data (art. 16 of EU Regulation 2016/679)
3. Obtain erasure (Right to be forgotten) (art. 17 of EU Regulation 2016/679)
4. Obtain restriction of processing (Art. 18 GDPR)
5. Achieve data portability.
6. Object to the processing of your data.
7. Lodge a complaint.
8. Oppose automated decision-making, where it exists.
9. Withdraw your consent at any time. The Data Subject may revoke consent to the processing of data at any time. The withdrawal of consent does NOT, however, affect the lawfulness of the processing based on the consent given before its withdrawal.

It should be noted that the person involved or the person mentioned in the report, with reference to their personal data processed in the context of the report, public disclosure or complaint, cannot exercise the above rights.

8. Transfer of data to third countries

For all the purposes indicated in this policy, the personal data of a common nature of the Data Subject may be communicated to all companies belonging to the group, subsidiaries, affiliates, etc., also located abroad, inside and outside the European Union, in compliance with the rights and guarantees provided for by current legislation, subject to verification that the country in question guarantees an "adequate" level of protection.

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

The undersigned also reserves the right to use cloud services, ensuring that the service providers will be selected from among those who provide adequate guarantees, as required by art. 46 of EU Regulation 2016/679 "European Regulation on the protection of personal data".

9. Modification of the Privacy Policy

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

The Data Controller
OFFICINE AMBROGIO MELESI & C. S.r.l.