WHISTLEBLOWING
Information on the processing of personal data
pursuant to art. 13 and 14 of Reg. (EU) 2016/679 ("GDPR")

Premise

Hereinafter LCI – Lavorazione Carta Riciclata Italiana SRL in its capacity as Data Controller, provides information relating to the processing of personal data of data subjects carried out as part of the management of whistleblowing reports, or unlawful conduct or violations referred to in Article 2.1, letter a) of Legislative Decree 24/2023 (hereinafter, "**Whistleblowing** Decree"), including those of the organisational, management and control model pursuant to Legislative Decree 231/2001 and subsequent amendments [*in the event that there is a MOG]*

Under the GDPR, "data subjects" are the natural persons to whom the data relates. In this case, the data subjects are the whistleblowers, the reported person and any persons mentioned in the report.

Reports can be made through the channels and methods provided for in the whistleblowing procedure (hereinafter, the "**Procedure**") and in particular:

a) in written form, through the appropriate software platform available at the link https://lci.segnalazioni.info/#/;

b) orally, through the appropriate function available through the software platform referred to in the previous point, with acquisition of the relevant audio file;

c) exceptionally, at the request of the whistleblower, as part of a face-to-face meeting (to be requested in any case through the online platform).

1. Data Controller

The Data Controller is LCI SRL, C.F. e P. IVA 04139540266, with registered office in Viale della Repubblica 193/B 31100 (TV), tel. 0422 693111, e-mail address privacy@lci-srl.it (hereinafter, "**Data Controller**").

2. Data Protection Officer/Privacy Representative

The Data Protection Officer (hereinafter, "**DPO")** can be contacted at the email address privacy@lci-srl.it

3. Categories and source of processed data

The following data will be processed as part of the whistleblowing report:

- Personal and contact details of the whistleblower, if voluntarily revealed by them;
- Data relating to the reported person and other persons involved in the report, including potentially data relating to the commission of offences;
- Data relating to the work carried out within the company organization;
- Any other data (potentially also special, if relevant to the report) contained in the report or acquired during the investigation phase.

The data of the whistleblower, those of the reported person and/or third parties are provided directly by the whistleblower himself and/or acquired during the consequent preliminary activities.

4. *Purposes of processing, legal bases and data retention times*

Why is personal data processed?	What is the legal basis for the processing?
For the management of whistleblowing reports, including the preliminary activities resulting from the report.	The fulfilment of a legal obligation to which the Data Controller is subject, as provided for by art. 6, paragraph 1, letter c) of the GDPR.
If necessary, in order to adopt the measures resulting from the report and, in general, for the protection of the rights of the Data Controller.	Legitimate interest of the Data Controller pursuant to art. 6 co.1 lett. f) of the GDPR.
For the disclosure of the identity of the whistleblower (if known) only in the cases provided for by law, e.g. to allow the whistleblower to defend himself in disciplinary proceedings, (art. 12 par. 5 and 6 of the Whistleblowing Decree).	Consent of the data subject pursuant to art. 6 para. 1 letter a) of the GDPR

For the documentation of a report made through the recorded voice messaging system, by further recording on a device suitable for storage and listening or by full transcription (Article 14, paragraph 2 of the Whistleblowing Decree).	Consent of the data subject pursuant to art. 6 para. 1 letter a) of the GDPR
For the management of any data, included in the report or emerged as part of the investigation, relating to criminal convictions and offences or related security measures.	The processing is authorised by EU or Member State law (specifically, by the Whistleblowing Decree), as provided for by art. 10 of the GDPR
For the management of particular data (i.e. data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health or sex life) relevant to the case of reporting.	The processing is permitted for reasons of significant public interest (specifically, to comply with the provisions of the Whistleblowing Decree) and/or the processing is necessary to ascertain, exercise or defend a right in court, pursuant to art. 9 para. 2 letters f) and g) of the GDPR
How long does the data retain?	
The data are stored for a maximum period of 5 years from the date of communication of the final outcome of the procedure for managing the report, except for the establishment of judicial or disciplinary proceedings following the report itself. In this case, the data will be kept for the entire duration of the proceedings, until their conclusion and the expiry of the deadlines for any appeals. Personal data that is manifestly not useful for the management of a specific report are not collected or, if collected accidentally, are deleted immediately. After the expiry of the storage terms indicated above, the data will be destroyed, deleted or made anonymous, compatibly with the technical timing of deletion and backup.	

5. Nature of the provision of data

In the reporting phase, the provision of data is at the discretion of the whistleblower, it being understood that excessively generic and unsubstantiated reports cannot be managed effectively.

During the preliminary phase, the data controller may acquire additional data, requesting them from the data subjects or carrying out its own investigations.

The procedure for managing reports guarantees the confidentiality of the identity of the whistleblower (if revealed), from the moment of receipt and in any subsequent contact, as well as of the persons subject to the report or in any case mentioned in the same.

In any case, any anonymous reports will be taken into account only if they are adequately substantiated, based on concrete elements and rendered in great detail, being such as to make the reported facts appear reliable.

6. Recipients of the data

The personal data relating to the management of the above reports are processed by the following subjects:

- TMC SRL, as Reporting Manager on behalf of the Data Controller, designated as Data Processor pursuant to Article 28 of Reg. (EU) 2016/679;
- the company Siatec S.r.l.., provider of the whistleblowing software platform, designated as Data Processor pursuant to Article 28 of Reg. (EU) 2016/679.

Any sharing of the report and documentation produced by the whistleblower with other company functions or with external professionals for investigation purposes is carried out in compliance with the Whistleblowing Procedure and Decree, with the utmost attention to protecting the confidentiality of the whistleblower and the reported, omitting any communication of data that is not strictly necessary.

It is understood that the identity of the whistleblower (and any other information from which it can be inferred, directly or indirectly) will not be revealed, without the consent of the same, to parties other than the Whistleblower Managers and (when necessary) to the professionals who assist them in the preliminary activity, without prejudice to the provisions of the applicable legislation.

The data may be communicated to the Judicial Authority and to other public bodies entitled to receive them, such as ANAC, in the cases and in the manner provided for by the Whistleblowing Decree and the Procedure.

In the context of any criminal proceedings, the identity of the reporting person is covered by secrecy in the manner and within the limits provided for in Article 329 of the Code of Criminal Procedure.

In the context of any proceedings before the Court of Auditors, the identity of the reporting person may not be revealed until the conclusion of the investigation phase.

7. Extra-EU data transfers

The data is not transferred outside the European Union.

8. Features of the software platform for sending reports

The platform for sending reports has the following features:

- It uses the open source software Globaleaks, developed following the OWASP development guidelines and already used by ANAC for the creation of its OpenWhistleblowing portal;
- it is supplied and maintained by the supplier Siatec S.r.l., without the participation of the Data Controller's Information Systems;
- only generates anonymous logs in relation to the activities carried out by the whistleblower, in order to prevent their identification;
- It is protected by security measures appropriate to the risk, including first of all the encryption of the data stored.

9. Rights of the data subjects

It is possible to exercise, in relation to the data processing described above, the rights recognized by the GDPR to the data subjects, including the right to:

- request access to the data and information referred to in art. 15 (purposes of processing, categories of personal data, etc.);
- obtain the correction of inaccurate data or the integration of incomplete data pursuant to art. 16;
- request the deletion of personal data in the cases provided for by art. 17, if the Data Controller no longer has the right to process them;
- obtain the limitation of processing (i.e. the temporary subjection of the data to the sole storage operation), in the cases provided for by art. 18 GDPR;
- object at any time, on grounds relating to special situations, to the processing of their personal data on the basis of legitimate interest pursuant to Article 6.1 lit. f) GDPR.

To exercise your rights, you can contact the DPO by sending an e-mail to the address privacy@lci-srl.it or, at the discretion of the data subjects, to the Whistleblowing Managers, through the Platform or to the info@siatec.it address .

Data subjects have the right to lodge a complaint with the Guarantor for the Protection of Personal Data or to take legal action if they believe that the processing of their personal data is contrary to current legislation.

It should be noted that, pursuant to art. 2-undecies of Legislative Decree no. 196/2003 ("Privacy Code"), the rights referred to in articles 15 to 22 of the GDPR cannot be exercised if the exercise of the same may result in an actual and concrete prejudice to the confidentiality of the identity of the whistleblower. In this case, the rights in question can be exercised through the Guarantor for the Protection of Personal Data, in the manner referred to in art. 160 of the Privacy Code.