

Privacy Notice - Reporting Person

Pursuant to Article 13 of Regulation (EU) 2016/679 concerning the processing of personal data in the context of reporting violations under Legislative Decree 24/23

Pursuant to Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter "GDPR") and the applicable legislation on personal data protection, we inform you that the personal data provided by you as the Reporting Person (hereinafter also the "Data Subject") through this "Reporting Form" or otherwise provided in case of an internal report of a violation pursuant to Legislative Decree No. 24/2023, will be processed, in compliance with the aforementioned legislation and in accordance with the principles of fairness, lawfulness, and transparency by personnel authorized by TEF Bridge s.r.l. pursuant to Article 29 of the GDPR and Article 2- *quaterdecies* of the Code regarding the protection of personal data (Legislative Decree 196/2003).

1. Data Controller

The Data Controller of personal data is TEF Bridge s.r.l. (hereinafter also the "Controller"), with registered office in Via Giovanni Durando 39 Milan, Italy 20158, IT.

2. Data Protection Officer (DPO)

The Controller has appointed a Data Protection Officer (DPO) who can be contacted at the following addresses:

- **Address:** Via Giovanni Durando 39 Milan, Italy 20158, IT
- **Email:** [omissis]
- **Certified Email (PEC):** [omissis]

3. Purpose of Processing

The personal data are processed exclusively for the purpose of managing the internal report, carrying out preliminary verification activities, conducting the investigation related to the violation reported under Legislative Decree No. 24/2023, and taking the resulting measures, including disciplinary actions.

4. Legal Basis of Processing

The processing of personal data is based on the necessity of fulfilling a **legal obligation** to which the Data Controller is subject, specifically the provisions of Legislative Decree No. 24/2023, as specified in Article 6, paragraph 1, letter c) of the GDPR.

5. Categories of Data Processed

The Controller processes the personal data of the Data Subject and third parties (e.g., the Involved Person) provided in the report, including:

- Identifying data (first name, last name, contact details, role, function, employment relationship with the Controller).
- Information related to the reported violation (details, context, time, place).
- Where applicable and strictly necessary for the purposes of the investigation, information that may include special categories of personal data (Art. 9 of the GDPR), or personal data relating to criminal convictions and offenses (Art. 10 of the GDPR), if included in the report.

6. Nature of the Provision of Data

The provision of data is **optional**. However, if the Reporting Person chooses to remain anonymous, the possibility of the Controller conducting a thorough investigation to ascertain the reported facts may be severely limited or impossible.

7. Processing Methods and Data Retention Period

Personal data is processed using computerized and/or paper-based tools, exclusively by authorized personnel of the Controller, ensuring the security, integrity, and confidentiality of the data, in compliance with the provisions of the GDPR.

The processing ensures the **confidentiality of the Reporting Person's identity** as required by Article 4 of Legislative Decree 24/2023, except for the cases provided for by the Decree itself (e.g., when consent is required, or when the report is subject to the provisions of Article 12, paragraph 2, of the Decree).

The data related to the report are stored for the time necessary to manage the report and, in any case, **not beyond five years** from the date of the final conclusion of the reporting procedure, in compliance with the principle of minimization of data retention (Article 2 *undecies* of Legislative Decree 196/2003, as amended).

8. Recipients of Personal Data

The personal data collected may be shared with or accessed by the following categories of subjects for the purposes described:

- The **Supervisory Body (OdV)**, which manages the internal reporting channel.
- The **Board of Directors (CdA)**, only in cases where the report concerns a member of the OdV.
- Subjects in charge of internal audit/control functions.
- External subjects appointed as Data Processors (e.g., legal or technical consultants) who assist the Controller in the investigation, subject to specific instructions and contractual obligations of confidentiality.
- The **National Anti-Corruption Authority (ANAC)**, the judicial authority, or the accounting authority, in the cases provided for by law.

The identity of the Reporting Person and the information contained in the report are not disclosed to persons other than those authorized to manage the reporting channel and the investigation, unless otherwise required by law (e.g., in the context of criminal proceedings).

9. Transfer of Data

The personal data will be processed on servers located within the European Union and will not be transferred outside the European Economic Area (EEA).

10. Rights of the Data Subject

The Data Subject, where applicable, has the right to:

1. Obtain confirmation as to whether or not personal data concerning them are being processed, and access the data (Right of Access).
2. Obtain the rectification of inaccurate personal data or the integration of incomplete data (Right to Rectification).
3. Obtain the erasure of personal data (Right to Erasure - Right to be Forgotten).
4. Obtain the restriction of processing (Right to Restriction of Processing).
5. Object to the processing of personal data (Right to Object).
6. Receive personal data concerning them in a structured, commonly used, and machine-readable format and transmit those data to another controller (Right to Data Portability).

The aforementioned rights may be exercised by contacting the Data Protection Officer at the addresses indicated in point 2.

The Data Subject also has the right to file a complaint pursuant to Article 77 of the GDPR with the Supervisory Authority (Data Protection Authority), where the exercise of such rights may cause actual and concrete prejudice to the confidentiality of the identity of the person reporting violations of which they became aware by reason of their employment relationship or the functions performed.

The exercise of the aforementioned rights may, in any case, be delayed, limited, or excluded with a motivated communication made by the Controller without delay, unless the communication may compromise the purpose of the limitation, for the time and within the limits in which this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the Reporting Person, the Involved Person, or the persons involved in the reports for various reasons. In such cases, pursuant to Article 2-*undecies*, paragraph 3, of Legislative Decree No. 196/2003, the Data Subject has the right to exercise the aforementioned rights through the Supervisory Authority in the manner set out in Article 160 of the aforementioned legislative decree.

In cases where it is believed that the processing of personal data occurs in violation of the provisions of the GDPR, it is possible to file a complaint with the Supervisory Authority, as provided for by Article 77 of the GDPR itself (excluding the limitations on the exercise of rights mentioned above and provided for by Article 2-*undecies*, paragraph 3, of Legislative Decree No. 196/2003), or to appeal to the judicial authority.