

**Information document pursuant to Articles 13 and 14 of Regulation
(EU) 2016/679
Information to data subjects**

In compliance with Regulation (EU) 2016/679 (the General Data Protection Regulation or GDPR) we are hereby giving you the required information on the processing of your personal data. This information is provided pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (General Data Protection Regulation) and to the national legislation implementing it **Personal data that can be processed:** «Personal data»: any information concerning an identified or identifiable natural person («data subject»); an identifiable natural person is one that can be identified, either directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online ID or one or more characteristic features of his/her physical, physiological, genetic, psychological, economic, cultural or social identity; (Recitals 26, 27 and 30)

- 1. JOINT CONTROLLERS OF THE PERSONAL DATA, pursuant to Articles 4 and 24 of Regulation (EU) 2016/679** are the entities belonging to the Ascom Group and namely:
- Ascom Parma Confcommercio – Imprese per l'Italia via Abbeveratoia 63/a 43126 – Parma, Italy Phone +39 0521-2986- e-mail: privacyascom@ascom.pr.it
 - Seacom srl via Abbeveratoia 63/a 43126 – Parma, Italy Phone + 39 0521-2986- e-mail: privacyseacom@ascom.pr.it
 - S.T.S. Centro Assistenza Tecnica S.r.l. via Abbeveratoia 63/a 43126 – Parma, Italy Phone + 39 0521-2986- e-mail: privacystscat@ascom.pr.it
 - Parma Incoming s.r.l. via Abbeveratoia 63/a 43126 Parma, Italy phone +39 0521 298883 Fax + 39 0521 298826 - e-mail: privacy@parmaincoming.it

2. DATA PROTECTION OFFICER (DPO)

Pursuant to Regulation (EU) 2016/679 the Ascom Group has appointed its Data Protection Officer (DPO), who can be contacted writing to the addresses of the Joint Controllers or to dpoascom@ascom.pr.it - dposeacom@ascom.pr.it - dpostscat@ascom.pr.it - dpo@parmaincoming.it

3. PURPOSES AND LEGAL BASIS OF DATA PROCESSING

The collected personal data shall be processed in compliance with the lawfulness conditions under Article 6(b) of Regulation (EU) 2016/679 for the purpose of managing the “Whistleblowing” internal channel pursuant to Italian Legislative Decree no. 24 of 10 March 2023 - Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and laying down provisions on the protection of persons who report breaches of national law. Therefore, the legal basis of the personal data processing is compliance with a legal obligation.

4. NATURE OF THE PROVISION OF DATA

The provision of data is necessary as it is strictly instrumental to the management of the whistleblowing internal channel.

5. RECIPIENTS OR CATEGORIES OF DATA RECIPIENTS

The personal data provided by you will be communicated to recipients, who will process the data acting as Data Processors (Article 28 of Regulation (EU) 679/2016) and/or as natural persons acting under the authority of the Data Controller and the Data Processor (Article 29 of Regulation (EU) 679/2016), for the purposes listed above. Specifically, the data will be communicated to:

- *Organismo di Vigilanza*, the body in charge of prevention of offences under Italian Legislative Decree no. 231 or 8 June 2001
- External persons managing the whistleblowing platform and acting as Data Processors

6. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY AND/OR AN INTERNATIONAL ORGANIZATION AND SAFEGUARDS

Within the scope of the purposes set out in this Information to data subjects, your personal data will be communicated/transferred to third-party recipients based in EU Member States; your data may be transferred to countries outside the EU (e.g., to the United States of America) solely in full compliance with Chapter V of the GDPR, which ensures that the level of protection of natural persons guaranteed by the GDPR is not undermined (“Article 45 Transfers on the basis of an adequacy decision, Article 46 Transfers subject to appropriate safeguards, Article 47 Binding corporate rules, Article 49 Derogations for specific situations”)

7. PERIOD OF DATA STORAGE OR CRITERIA FOR DETERMINING THE PERIOD

The processing will be carried out by automated means and manually, with methods and tools aimed at guaranteeing maximum security and privacy, by subjects specifically appointed to do so. In compliance with Article 5(1)(e) of Regulation (EU) 2016/679 the reported items and the related documents will be stored for the time necessary to process the reported item and, in any case, no longer than for 5 years after the final outcome of the procedure is reported.

8. RIGHTS OF THE DATA SUBJECTS

You can exercise your rights under Regulation (EU) 2016/679 by contacting the Ascom Group by e-mail or mail to the contract data of the Joint Controllers set out above, and your rights include the withdrawal of your consent (if given) directly through the platform used to manage the whistleblowing internal channel.

You have the right to lodge a complaint with a supervisory authority.



S.T.S.
Centro
Assistenza
Tecnica s.r.l.



To ANONYMOUSLY report any items, please use the link:

<https://my.yesnology.com/welcomenoinvitation/92317a22-2b77-4f02-832a-63119df1c4c3>

Or scan the QR-Code:



To report any items NOT ANONYMOUSLY, please use the link:

<https://my.yesnology.com/welcomenoinvitation/f936a7eb-03f5-4f38-9535-0ccb3517e266>

Or scan the QR-Code:

