

## INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF THE EU REGULATION 2016/679

This information is provided by the Data Controller regarding the processing of personal data carried out through the dedicated channel for reporting violations or irregularities, commonly known as Whistleblowing. If the report is submitted by an individual who has an employment or collaboration relationship with the Data Controller, this information should be understood as supplementary and not as a replacement for the information provided to personnel for the management of the employment relationship.

### Data subjects

Suppliers and contact persons of supplying companies.

### Data Controller

DocFlow Italia S.p.A. ubicate in Centro Direzionale Milanofiori, Strada 1 Palazzo F8 – 20057 Assago (MI), VAT IT11325150156, contact mail: [marketing@docflow.it](mailto:marketing@docflow.it)

### Data Protection Officer

According to Article 37 of the GDPR, the Data Controller has appointed a Data Protection Officer who can be contacted at the email address: [dpo@docflow.it](mailto:dpo@docflow.it)

### Purpose of data processing

your data will be processed for the following purposes based on the relevant legal bases:

n°	Purpose	Legal Bases
1	The management of reports resulting from the application of Italian Legislative Decree 231/01, Directive 2019/1937, and Italian Legislative Decree 24/2023 entails that the identity of the whistleblower cannot be disclosed. However, in the event of initiating a disciplinary procedure where the whistleblower's identity is essential for the defense of the accused party, the whistleblower may choose whether or not to consent to the disclosure of their identity, enabling their report to be used for the proceedings. Alternatively, the confidentiality of the whistleblower's identity may be waived within the scope of a criminal proceeding, in accordance with the provisions of Article 329 of the Italian Code of Criminal Procedure (c.p.p.).	Processing is necessary for satisfying the legal obligation to which the controller is subject. Art. 6 par. 1 letter c)

In no way will an automated decision-making process (profiling) be applied to your personal data.

### Type of personal data processed:

- Data relating to an identifier, such as a name, location, contact details, etc.;
- Data contained in the report that may potentially be of a sensitive and/or judicial nature

### Method of processing

The personal data collected will primarily be processed by:

- The reports submitted are received and remain solely in the possession of the Supervisory Body appointed in accordance with Legislative Decree 231/01.

### Method of processing

The personal data may be disclosed to:

- Institutions and/or Public Authorities, Judiciary, Law Enforcement Bodies;
- External consultants (e.g., law firms) potentially involved in the investigative phase of the report.

The above-mentioned entities process the data as independent data controllers.

### Personal data disclosure

Your personal data will not be disclosed.

### Transfers of personal data to third countries

The personal data collected will be processed within European Union.

### Data retention

Your personal data will be kept according to the following:

Purposes	Data retention
<b>Retention of report contents</b>	<p>The personal data collected is stored for a period not exceeding five years from the date of receiving the report. Additionally, it is retained for the entire duration necessary for the handling of any proceedings arising from the management of the report (disciplinary, criminal, accounting).</p> <p>The storage of personal data, including sensitive data, may be extended beyond the specified period within the limits of the statute of limitations for legal rights, in relation to defense-related requirements in the event of disputes.</p>

### Rights of the data subjects

Under Articles 15-22 of the GDPR, the data subject can request the Data Controller to exercise the right of access, rectification, erasure (right to be forgotten), restriction of processing, data portability, objection to processing, and withdrawal of consent.

For more information regarding the data subject's rights, please visit the website [www.garanteprivacy.it](http://www.garanteprivacy.it).

According to Article 77 of the GDPR, the data subject has the right to lodge a complaint or report to the supervisory authority, the Garante per la protezione dei dati personali, located at Piazza Venezia, 11 - 00186 Rome, email: [urp@gpdp.it](mailto:urp@gpdp.it).

According to Article 2-undecies of the Privacy Code (implemented by Article 23 of the GDPR), it is informed that the aforementioned rights cannot be exercised by the data subjects (through a request to the Data Controller or a complaint under Article 77 of the GDPR) if exercising these rights could result in an actual and concrete prejudice to the confidentiality of the whistleblower's identity.

In particular, the exercise of these rights: • will be carried out in accordance with the provisions of the law or regulations governing the sector (including Legislative Decree 231/2001 as amended by Law No. 179/2017);

- may be delayed, limited, or excluded with a motivated communication provided without delay to the data subject unless such communication compromises the purpose of the limitation, to the extent that it constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the data subject, to safeguard the confidentiality of the whistleblower's identity;
- in such cases, the data subject's rights may also be exercised through the Garante, in accordance with the procedures set forth in Article 160 of the Privacy Code.
- In such cases, the Garante informs the data subject that all necessary checks or reviews have been carried out and informs them of their right to seek judicial remedies.

For further information and to submit your request, please contact the Data Controller at the provided contact address.