



PRIVACY POLICY
pursuant to Articles 13 of the EU Regulation No. 679/2016

AG Digital Media S.p.A. Informs you of the following regarding the processing of personal data carried out as part of the relation between You and the Company, pursuant to current data protection legislation and, in particular, Article 13 of EU Regulation No. 2016/679 ("GDPR").



Who decides how and why your Data is processed?

The data controller of your personal data is AG Digital Media S.p.A., with a registered office in Corso Italia, 22, 20122, Milan, Italy, tax code and VAT 09568760962, e-mail privacy@freedamedia.com (hereinafter the "**Company**" or "**Freeda**" or "**Data Controller**").



Data Protection Officer (DPO)

The Controller has appointed a Data Protection Officer (DPO) who can be contacted by writing to dpo@freedamedia.com



What is the source of your Data?

Your data will be collected directly from you.



What data do we process?

Freeda processes personal data about you, including:

- **identification data:** name and surname
- any other additional data provided by you by sending it to the reporting collection channel used.



Why do we process your Data and based on what conditions of lawfulness are we entitled to do so?

Your Data will be processed for the following purposes and on the basis of the following conditions of lawfulness:

- **Management of reports** (verification of the facts covered by the report). The legal basis of the treatment is the regulatory obligation established by the legislative decree 24 of 10 March 2023;
- **Management of any disciplinary measures based in whole or in part on the report.** In order to guarantee the right of defense of the reported, the information contained in the report may be used, together with any other elements of external feedback, in the context of the disciplinary measures initiated against the reported. The identity of the reporting person cannot be disclosed, where the dispute of the disciplinary charge is based on separate and additional investigations with respect to the report, even if consequent to the itself. If the dispute is based, in whole or in part, on reporting and knowledge of the identity of the reporting person is indispensable for the defense of the accused, the report will be used for the purposes of the disciplinary procedure only in the presence of consent expressed by the reporting person upon revealing his or her identity. Therefore, in this case not provide it will make it impossible to proceed against the reported person.



How do we process your data and how long do we keep them?

The processing of your Data will be based on the principles of lawfulness, fairness, transparency, purpose limitation and storage, data minimisation, accuracy, integrity and confidentiality, in accordance with the GDPR and current national data protection legislation. Your Data will be processed with the support of computerised and paper means and are protected by appropriate security measures to ensure their confidentiality, integrity and availability.

We retain your Data only **for as long as necessary to achieve the purposes for which it was collected or for any other legitimate related purposes.**

In particular, we will retain your Data for a period **not exceeding 5 years after its collection** by the Company. Once this retention period has expired, your Data will be deleted.



Who do we share your Data with?

Your Data will be processed by authorised and trained personnel, who will operate in accordance with the principles of fairness, loyalty and transparency and will protect the confidentiality of your Data by means of technical and organisational security measures suitable to guarantee an adequate level of protection.

Furthermore, the Data may also be communicated to authorities and institutions to which the faculty of access to them is granted by provisions of the law or regulations (e.g. public authorities security and police forces).

Furthermore, the Data is also communicated by the supplier Audit People Srl, manager of the reporting channels, appointed as data controllers.

You can request a list of the data processors and further information on the recipients of your Data by writing to privacy@freedamedia.com



Will your data be transferred outside the EU?

The Data Controller stores personal data on servers located within the European Union but may transfer your data outside the EU only if the third country has been deemed adequate by the European Commission (e.g. UK), or, in the absence of an adequacy decision, if Freedada has signed with the non-EU data importer the Standard Contractual Clauses approved by the European Commission, possibly supplemented by additional technical/organisational/legal measures necessary to ensure that the level of protection of personal data is equivalent to that of the European Union.

You may contact the Data Controller at any time by sending an e-mail to privacy@freedamedia.com asking which entities your personal data is being transferred to and to receive a copy of the safeguards adopted for the transfer.



What are your rights in relation to your Data?

You may exercise, in relation to the processing of your Data, the rights provided by the GDPR, (art. 15-21 GDPR) and in particular:

- receive confirmation of the existence of your Personal Data and access to its content (right of access);
- update, amend and/or correct your Data (right of rectification);
- request the deletion of your Data (right to be forgotten);
- request the restriction of the processing of your Data (right to restriction of processing);
- revoke the consent given, in cases where the processing is carried out based on the same, without prejudice to the lawfulness of the processing based on the consent given before revocation;
- in the cases provided for, receive a copy of the data in electronic format concerning you rendered in the context of the contract and request that such data be transmitted to another data controller (right to data portability).

In addition, you have the right to object in whole or in part to the processing of your data (right to object), provided that the requirements of the data protection legislation are met.

Should you exercise any of the aforementioned rights, it will be the responsibility of the Company to verify that you are entitled to exercise them, and you will be acknowledged, as a rule, within one month.

To exercise these rights and obtain further information on the processing of your Data, you may send an e-mail to privacy@freedamedia.com



What other rights can you exercise in relation to your Data?

Should you consider that the processing of Data relating to you is in breach of the applicable data protection legislation, you have the right to lodge a complaint with the Guarantor for the protection of personal data, using the references available on the website www.garanteprivacy.it

Last update: May 2022

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