



MMV – Minuteria Meccanica Valsesiana S.r.l.  
Via Varallo n. 2  
13027 Scopa (VC)  
Tel. 0163 71124  
<http://www.mmv-srl.it>  
e-mail: [tosifratelli@mmv-srl.it](mailto:tosifratelli@mmv-srl.it) pec: [mmvsrl@pec.tosi.it](mailto:mmvsrl@pec.tosi.it)  
Cap. Soc. € 46.800 i.v. - R.E.A. n. VC-128638  
CCIAA Monte Rosa Laghi Alto Piemonte  
Cod. Fisc. e P.IVA 01236940027  
Cod. Id. CEE IT01236940027

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## INFORMATION ON THE PROCESSING OF PERSONAL DATA

Pursuant to Article 13 of the EU Regulation 679/2016 (hereinafter the "GDPR"), MMV - Minuteria Meccanica Valsesiana S.r.l., (hereinafter the "Company") provides the following information regarding the processing of personal data (hereinafter the "Data") carried out in relation to the reporting service in accordance with Legislative Decree 24/2023.

### DATA CONTROLLER

The Data Controller is MMV - Minuteria Meccanica Valsesiana S.r.l., con sede in Scopa (VC), Via Varallo, 2, who can be contacted by mail at the above address or by e-mail at the following addresses: [privacy@mmv-srl.it](mailto:privacy@mmv-srl.it).

### DATA PROCESSED, LEGAL BASIS, NATURE, AND PURPOSE OF PROCESSING

The data processed in the handling of the report is:

- contact, identification or contact details provided by the reporter.
- Information (identification data, professional data, financial data) on the reported person contained in the report or acquired during the investigation;
- Information (identification data, professional data, financial data) relating to third parties that may be included in the report and in any documents attached or acquired during the investigation.

The data provided will be processed for the following purposes:

1. Handling of reports (ascertaining the facts that are the subject of the report). The legal basis for the processing is the regulatory obligation under Legislative Decree 24 of 10 March 2023.
2. Management of any disciplinary proceedings based in whole or in part on the report. To guarantee the whistleblower's right of defense, the information contained in the report may be used, together with any other external evidence, in the disciplinary proceedings initiated against the whistleblower. The identity of the person making the report may not be disclosed, where the allegation of the disciplinary charge is based on investigations that are separate from and additional to the report, even if consequent to it. If the charge is based, in whole or in part, on the report and knowledge of the identity of the person reporting the matter is indispensable for the accused's "defense, the report shall be usable for the purposes of disciplinary proceedings only if the person reporting the matter has expressly consented to the disclosure of his/her identity. Therefore, in this case, failure to do so will make it impossible to proceed against the person making the report.

The personal data identifying the reporter is processed and stored in such a way as to be visible only to the body in charge of handling the report. The company adopts all the guarantees provided for by law to protect the confidentiality of the reporter's identity, so that it is not disclosed to third parties without the reporter's express consent, except in the case of bad faith or defamatory reports.

### RECIPIENTS OF DATA

Data may be shared with:

- 1) supervisory body, if any, of the company for the data of the reporter only;
- 2) internal employees of the Data Controller or persons, bodies or authorities to whom it is mandatory to disclose the Data by virtue of legal provisions or orders of the authorities for the data to be reported;
- 3) parties that typically act as data controllers within the meaning of Article 28 GDPR, i.e., parties that cooperate with the Company for the pursuit of the above purposes.



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### **DATA TRANSFER ABROAD**

Your data will be processed in Italy, in accordance with current data protection regulations.

Should you request processing to be carried out outside the national territory, the Data may be transferred outside the Italian territory; in this case, you will be provided with specific information.

### **DATA RETENTION**

Personal data relating to reports and the relevant documentation are retained and kept for the period necessary to complete the verification of the facts set out in the report and for 5 years after the report is closed, except for any proceedings arising from the handling of the report (disciplinary, criminal, accounting) against the reported person or the reporter (bad faith, false or defamatory statements). In this case, they will be kept for the duration of the proceedings and until the expiry of the time limit for challenging the relevant measure. Personal data that is clearly not useful for the processing of a specific report is not collected or, if accidentally collected, is deleted immediately.

### **RIGHTS OF THE DATA SUBJECTS**

The interested parties may, at any time, request to know the origin, purpose and methods on which the processing is based, to obtain access to the same, to update, rectify, integrate, delete, transform into anonymous form, limit processing, order the blocking of data processed in violation of the law and obtain a copy of them in a structured format, commonly used and machine-readable or to transmit such data to another controller without hindrance. Data subjects may also lodge a complaint with the Supervisory Authority, represented in Italy by the Guarantor for the Protection of Personal Data. For further information, please visit the Garante's website at [www.garanteprivacy.it](http://www.garanteprivacy.it).

To exercise their rights, interested parties may write to the e-mail [privacy@mmv-srl.it](mailto:privacy@mmv-srl.it) (alternatively, by writing to the Data Controller MMV - Minuteria Meccanica Valsesiana S.r.l., with registered office in Scopa (VC), Via Varallo, 2).

### **DATA PROTECTION OFFICER**

The Data Protection Officer (DPO) has not been appointed.