# Informative Report about Data Processing

Based on the provisions of the 2016/679 European Regulation ART. 13 (from now on "GDPR"), Centralfin srl companies (hereinafter "**Company**") provides the personal data processing ("**data**"), according to Law decree 24/2023 ("*Whistleblowing*").
AFC Amministrazione Finanza e Controllo srl PEC afcpec@legalmail.it
CSA SPA PEC csaspa@legalmail.it
Central Shipping Agency SPA PEC centralshippingagencyspa@legalmail.it.
Portital srl PEC portital@legalmail.it
Intermedri srl PEC intermedri@legalmail.it
Centralfin srl PEC centralfinspa@legalmail.it

**DATA CONTROLLER**
The data controller is the single company
address: 20156 Milano _Via Ludovico Breme, 25/27,
mail: privacy@csaspa.com

**DATA PROCESSING, LEGAL FUNDAMENTALS, PROVISION AND PURPOSES.**
The processed data in the management of *Whistleblowing* are:
- contact data, identification or contact details of the whistleblower;
- other information of the whistleblower contained in the *Whistleblowing* o acquired during the investigation;
- other information about third parties found in the documentation or during the investigation.

The purposes of the processing are:

1. Management reports (assessment of the facts covered by the report). The legal basis of the processing is the regulatory obligation provided by Legislation n. 24 issued on the 10th March 2023
2. Management of disciplinary action based on the *Whistleblowing*. In order to guarantee the right of defense of the whistleblower, the information contained in the report may be used, together with any other elements of external feedback, as part of the disciplinary action against the reported person.
3. The identity of the whistleblower can't be revealed, if the disciplinary action is based on specific and further investigations compared to the *Whistleblowing* , even if they are a consequence of the same. If the disciplinary action is based, in whole or in part, on the knowledge of the identity of the whistleblower and it is indispensable for the defense, the *Whistleblowing* could be used for the disciplinary action only with the consent of the whsitleblower. Therefore, without it, it will not be possible to proceed against the reported person.

The personal data of the whistleblower are processed and archived so as to be visible exclusively to the persons in charge. The company adopts all the guarantees provided by law in order to protect the confidentiality of the identity, so that it is not revealed to third parties without the express consent of the latter, except in the case of reports in bad faith or defamatory.

**DATA DIFFUSION**
Data could be shared with:

1) Board of Directors, employees or subjects, bodies or authorities to whom it is mandatory to communicate the Data pursuant to legal provisions or orders of the authorities for the data subject to the report
2) subjects who act as data controllers as per art. 28 GDPR, i.e. subjects who cooperate with the Company for the pursuit of the above-mentioned purposes

**TRANSFER OF DATA ABROAD**
Your data will be processed in Italy, in compliance with current legislation on GDPR.
If you request data processing outside the national territory, you will be provided with specific information.

**RETENTION PERIOD**
The personal data relating to the *Whistleblowing* are stored and maintained for the period necessary to complete the verification of the facts exposed in the report and for a subsequent 5 years from the closure of the report, except for any proceedings arising from the management of the report (disciplinary, criminal, accountants) towards the person reported or the reported person (bad faith, false or defamatory statements). In this case they will be stored for the entire duration of the same and until the deadline for appealing the relevant provision has expired. Useless Personal data are not collected or, if collected accidentally, are deleted immediately.

**RIGHTS OF DATA SUBJECTS**
Data Subjects can request – at any time - to know the origin, purpose and methods on which the processing is based, to obtain access to the same, updating, rectification, integration, cancellation, transformation into anonymous form, the limitation of processing, to order the blocking of data processed in violation of the law and to obtain a copy in a structured, traditional and machine-readable format or to transmit such data to another data controller without impediments. Data subjects may also lodge a complaint with the Supervisory Authority, represented in Italy by the Privacy Guarantor. For information on this you can consult the website www.garanteprivacy.it.
In order to exercise their rights, data subjects could write to the addresses mentioned above.