

INFORMATION ON THE PROCESSING OF PERSONAL DATA

The company **SEIM S.r.l.** (hereinafter, for the sake of brevity, "SEIM" or the "Company") informs you that the personal data acquired will be processed in compliance with the law on the protection of personal data and according to the methods indicated in this information (provided pursuant to Article 13 of EU Regulation no. 679/2016 – so-called "SEIM"). GDPR):

1. Data of the Data Controller

SEIM S.r.l., VAT no. 02311450155, with registered office in Via Alessandro Volta no. 17 – 20090 Cusago (MI), is the Data Controller of the personal data of users who consult this web page.

The Company can be contacted at the e-mail address privacy@seim.it.

2. Types of data collected

By filling out the form on the portal used to send Whistleblowing reports, the Data Subject voluntarily sends the following personal data:

- description of the report;
- further data relating to the same or requests for clarification;
- further documentation relating to the same;
- role held within the company;
- Master data;
- contact details.
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3. Purpose and legal basis of the processing

The data collected and processed by SEIM will be processed for the following purposes:

- a) comply with the legal obligation deriving from the provisions of art. 6 of Legislative Decree no. 231 of 2001, as amended by Law no. 179 of 2017, containing "Provisions for the protection of those who report crimes or irregularities of which they have become aware in the context of a public or private employment relationship". The legal basis that legitimizes this purpose of the processing is to be identified in art. 6, par. 1, letter c) GDPR, i.e. compliance with a legal obligation of the Data Controller

4. Data retention period

Personal data collected through the reporting portal will be stored for 5 years and then immediately deleted.

5. Processing methods

The personal data collected will be processed, stored and processed with electronic tools and will be stored both on computer and paper supports, organized in databases, and on any other type of suitable support.

Specific security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorized access.

The processing of personal data carried out by SEIM does not involve automated decision-making.

6. Communication of personal data

The communication of the Data Subject's data through the portal for the management of Whistleblowing reports is a necessary requirement for taking charge of the report and, therefore, it is the obligation of the Data Subject to provide such data.

Failure to communicate the personal data identified above will make it impossible for SEIM to proceed with the evaluation of the same.

7. Subjects to whom personal data may be communicated

The personal data collected will be communicated to employees in charge of the investigation of Whistleblowing reports and members of the Supervisory Body pursuant to Legislative Decree 231/2001. In addition, considering that Whistleblowing reports are forwarded through the My Whistleblowing software, your personal data may also be accessed by the provider of the aforementioned application, appointed for this purpose as data processor pursuant to Article 28 of the GDPR. It is understood that, in line with the principle of protection of the confidentiality of the whistleblower pursuant to Law 179/2017, the sharing of your personal data will be limited to what is strictly necessary in order to guarantee your confidentiality.

8. Transfer of data outside the European Economic Area or to international organizations

As part of the processing operations described in this policy, SEIM does not transfer personal data outside the European Economic Area or to international organizations.

9. Rights of the data subject

In relation to the data processing regulated by this policy, the Data Subject has the right to exercise the rights provided for by EU Regulation no. 679/2016 (GDPR) at any time.

- **Right to be informed** of any processing of your personal data. The Data Subject has the right to obtain confirmation as to whether or not his or her personal data is being processed and, if so, must be informed about any aspect relating to the processing operations, including, for example, information about:

- the Data Processors and any other recipients of the data (to whom the personal data may be disclosed),
- the purpose and legal basis,
- the types of data processed and their retention period,
- the transfer of personal data to third countries or international organisations.
- **The right to access** your personal data, the right to rectification of inaccurate data as well as the right to the integration of incomplete data.
- **Right to erasure** (so-called "Erasure"). *right to be forgotten*) under the conditions established by art. 17 GDPR, for example, when your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
- **Right to restriction of processing** to the purposes and/or manner for which your personal data was collected, under the conditions set out in Article 18 of the GDPR.
- **Right to data portability**, i.e. the right to receive a copy of all personal data that you have provided to the Data Controller or to transmit such data to another Data Controller without hindrance.
- **Right to withdraw consent**, when expressed to legitimize the processing of your personal data. This right can be exercised at any time, without prejudice to the lawfulness of the processing based on the consent given before its withdrawal.
- **The right to lodge a complaint** with a Supervisory Authority, in the event that he/she believes that the processing concerning him/her violates the legislation in force. In this case, he must contact the authority of the Member State in which he or she habitually resides, works or the place where the alleged violation occurred. The contact details of the Italian Supervisory Authority (Garante per la Protezione dei Dati Personali) can be found on [its website](#).

In addition, **the Data Subject has the right to object** to the processing of his or her personal data when processing:

- is necessary for the performance of a task carried out in the public interest,
- it is necessary for the pursuit of a legitimate interest of the controller,
- it has direct marketing purposes, including profiling.

To exercise the rights listed above, the Data Subject may send a request by email to privacy@seim.it
The Company will respond to the User's requests within a maximum period of 30 days.