

Azienda Agricola Ceretto S.s.a

Loc. San Cassiano 34
12051 Alba (CN)
VAT No. 03021420041

CERETTO

Personal data processing policy pursuant to arts. 13-14 of Reg. (EU) 2016/679

Data Subjects: Whistleblower.

In its role as Data Controller for your personal data, pursuant to and in accordance with Reg. (EU) 2016/679, hereinafter the “GDPR”, Azienda Agricola Ceretto hereby informs you that the above-mentioned regulation provides for the protection of data subjects with regard to the processing of personal data and that this processing will be done in accordance with the principles of fairness, lawfulness, transparency and protection of your privacy and your rights.

Your personal data will be processed in accordance with the legislative provisions of the above-mentioned regulation and privacy obligations hereby provided for.

Furthermore, the Controller may acquire knowledge of special categories of personal data and, specifically: Common data and any special data processed as part of managing whistleblowing reports. The personal data processing for these special categories is carried out in compliance with art. 9 of the GDPR.

Purpose and legal basis for processing: in particular, your data will be processed for the following purposes connected to fulfilling legislative or contractual obligations:

- Compliance activities in the context of Legislative Decree 24/2023.

Your data will also be processed for the following purposes connected to fulfilling legislative obligations:

- Reception, analysis and management of the report, as well as to confirm the facts covered by the report and the adoption of the consequent measures, in fulfilment of the provisions referred to in Legislative Decree No. 24 of 10 March 2023.

Your personal data may, in addition and subject to your consent, be used for the following purposes:

- disclosure of your identity to persons other than those responsible for receiving or following up on reports (paragraph 2 of art. 12 of Legislative Decree 24/2023) or as part of the procedure, if the notification is founded, in whole or in part, on the report and the knowledge of your identity is indispensable for the accused's defence (paragraph 5 of art. 12 of Legislative Decree 24/2023).

Granting data for the above-mentioned purposes is optional for you. If you refuse such processing, your refusal will not compromise the continuation of the relationship or the accuracy of the processing itself.

Processing methods. Your data may be processed in the following ways:

- by means of computers with the use of software systems managed by Third parties;
- Oral processing;
- processing using electronic means;
- temporary processing in an anonymous/anonymised Form if chosen by the reporter.

All processing takes place in compliance with the methods referred to in arts. 6 and 32 of the GDPR and by adopting the appropriate security measures provided for.

Your data will only be processed by staff expressly authorised by the Controller and, in particular, by the following categories of authorised staff:

- Supervisory Board.

Communication: your data may be communicated to external parties to correctly manage the relationship and, in particular, the following categories of

Recipients, including all the duly appointed Processors:

- Judicial Authority;
- Communication to legally compulsory bodies in relation to whistleblowing regulations according to Legislative Decree 24/2023; Bodies responsible for investigations;
- Digital platform for whistleblowing management: Wallbreakers as Processor pursuant to art. 28 of the GDPR.

Dissemination: Your personal data will not be disseminated in any way.

Storage Period. We would like to inform you that, with respect to the principles of lawfulness, restriction of purposes and data minimisation, pursuant to art. 5 of the GDPR, the storage period for your personal data is:

- Your data may be stored for up to 5 years starting from the date when the final outcome of the reporting procedure is communicated (art. 14 of Legislative Decree 24/2023);
- established as a period no longer than the time it takes to fulfil the purposes for which they are collected and processed and in compliance with the mandatory time frames prescribed by law;
- established as a period no longer than the time it takes to fulfil legal obligations and for protection in litigation.

Controller: the Data Controller for your data, pursuant to law, is Azienda Agricola Ceretto Loc. San Cassiano 34, 12051 Alba (CN), VAT No. 03021420041 in the person of its pro tempore legal representative.

You are entitled to obtain the erasure (right to be forgotten), restriction, updating, rectification or portability of personal data concerning you from the Controller, or to object to its processing, as well as, in general, to exercise all the rights stipulated by arts. 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

You may also view the updated version of this policy at any time using the following link:

<https://www.privacylab.it/informativa.php?24528504067>

Reg (UE) 2016/679: Arts. 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation of the existence, or lack thereof, of personal data concerning them, even if not yet registered, their communication in an intelligible form and the possibility of filing a complaint with the Supervisory Authority.

2. The data subject has the right to obtain indication of:

- a. the origin of the personal data;
- b. the processing purposes and methods;
- c. the logic applied if processing is carried out with the aid of electronic tools;
- d. the details of the controller, processors and designated representative pursuant to article 5, paragraph 2;
- e. the parties or categories of parties to which the personal data may be communicated or who may learn about these data as designated representative within the State, of processors or appointees.

3. The data subject has the right to obtain:

- a. the updating, rectification or, when interested, the supplementation of data;
- b. the erasure, transformation into an anonymised form or blocking of data processed in breach of the law, including those for which storage is not necessary in relation to the purposes for which the data were collected or subsequently processed;
- c. certification that the operations referred to in letters a) and b) have been brought to the attention, including as far as regards their content, of those to whom the data were communicated or disseminated, except if this proves impossible to fulfil or entails using means clearly disproportionate with respect to the right being protected;
- d. the portability of data.

4. The data subject has the right to object, in whole or in part:

- a. on legitimate grounds to the processing of personal data concerning them, even if pertinent to the purpose of collection;
- b. to the processing of personal data concerning them for the purposes of sending advertising or direct sales material or for conducting market research or commercial communications.

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Data subject consent form

Date : Place :

Name, Surname:

Do you consent to the processing of personal data for the optional purposes listed below?

☐ YES

☐ NO disclosure of your identity to persons other than those responsible for receiving or following up on reports (paragraph 2 of art. 12 of Legislative Decree 24/2023) or as part of the procedure, if the notification is founded, in whole or in part, on the report and the knowledge of your identity is indispensable for the accused's defence (paragraph 5 of art. 12 of Legislative Decree 24/2023).

The data subject:
