



## PRIVACY

### PRIVACY NOTICE PURSUANT TO ARTICLES 13-14 OF THE GDPR (GENERAL DATA PROTECTION REGULATION) REGULATION (EU) 2016/679

Dear “Data Subject”, we wish to inform you that the “Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data” (hereinafter “GDPR”) provides for the protection of individuals and other entities with regard to the processing of personal data.

#### CONTROLLER

Ge.S.A.C. S.p.A., “Controller” of the personal data, informs you, in accordance with Article 13 of the GDPR, that it will process the personal data you provide in the following ways:

The data you provide at the time of registration and in the reporting will be processed in accordance with the principles of correctness, lawfulness, transparency and protection of confidentiality and rights, both yours and those of all data subjects, in compliance with the obligations of confidentiality under the legislation on privacy and the law on whistleblowing.

#### PURPOSE AND LEGAL BASIS OF DATA PROCESSING

The data you provide will be processed in relation to the obligations of Law 179/2017 on Whistleblowing. The primary legal basis for the processing is the legitimate interest of the Controller [Article 6 paragraph 1 letter f GDPR] in complying its Organisation, Management and Control Model (MOG), adopted pursuant to Legislative Decree No. 231/2001, with amendments to the aforementioned law with regard to the requirements of the MOG (see Article 6, paragraph 2-bis et seq. of Legislative Decree 231/01 introduced by Article 2 of Law No. 179/2017), without prejudice to the consent of the whistleblower to the processing of personal data provided during registration [Article 6 paragraph 1(a) GDPR].

#### PROCESSED DATA

The platform <https://whistleblowinggesac.segnalazioni.net> of Ge.S.A.C. S.p.A. collects only your registration data and those communicated in the reporting. Among the data you have voluntarily provided, the following personal data may be acquired:

Name, email address and contents of the reporting. Your personal data, related to the profile, are not directly viewable in the reporting.



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### NATURE OF THE PROVISION OF DATA AND CONSENT

We inform you that, taking into account the purposes of the processing as described above, the provision of your data during registration (name and email address) is optional, as there is also the possibility of making a reporting without registration, but failure to provide such data results in the inability to create a whistleblower (reporting subject) recorded in the system.

Therefore, the consent to the processing of data by ticking the appropriate box is essential to proceed with the registration.

With regard to the person reported or any persons involved in the reporting, the processing of personal data is lawful even without the consent of the data subject, as necessary to pursue a legitimate interest of the Controller, as the latter's interest in combating unlawful conduct prevails over the interests and rights of the person reported involved.

### METHODS OF DATA PROCESSING

The processing shall be carried out with IT and screen-based tools with logic of organization and processing strictly related to the purposes mentioned above and in any case in order to ensure the security, integrity and confidentiality of the data in compliance with organizational, physical and logical measures provided by the provisions in force. Please note that your personal data provided in the registration form (name and email address) are separated from your possible reporting and that the association of your identity with the reporting can only be made by the "Person in charge" of the management of reporting (SB).

### STORAGE PERIOD

The personal data relating to reporting are kept and maintained for as long as necessary to carry out any proceedings arising from the management of the reporting (disciplinary, criminal, accounting), in accordance with the relevant company procedures.

### DATA RECIPIENTS

The recipients of the reporting is the current Supervisory Body appointed pursuant to Legislative Decree 231/2001.

During the checks, the Supervisory Board may supported by the company functions competent from time to time and, where deemed appropriate, by external consultants specialised in the field of the reporting received and whose involvement serves the purpose of ascertaining the reporting, ensuring the confidentiality and, where possible, the anonymisation of any personal data contained in the reporting.



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### RIGHTS OF THE DATA SUBJECT – WHISTLEBLOWER

You may exercise your rights at any time:

- of access to personal data;
- to obtain the rectification or erasure of the same (except for the contents of the reporting);
- to revoke consent, where applicable: revocation of consent does not affect the lawfulness of the processing based on the consent given before revocation; revocation of consent results in the impossibility to access your profile, you can still view the reports through their codes; revocation is not provided for in any case if the processing is necessary to comply with a legal obligation with which the controller shall comply;
- to lodge a complaint with the supervisory authority (Italian Data Protection Authority).

### COOKIES

No personal user data is implicitly acquired by the platform.

We do not use cookies to transmit personal information, nor do we use persistent cookies to track users.

Only technical cookies are used to the extent strictly necessary for the proper and efficient use of the platform.

The use of session cookies, which are not permanently stored on the user's computer and disappear when the browser is closed, is strictly limited to the transmission of session identifiers, consisting of random numbers generated by the server, necessary to enable secure and efficient exploration of the platform.

### CONTACTS

The “Controller” is Ge.S.A.C. S.p.A. Certified email: [protocollo@gesac.legalmail.it](mailto:protocollo@gesac.legalmail.it) with registered office at Uffici Direzionali GESAC - Capodichino Airport - 80144 Naples

The “Data Protection Officer”, you may consult to exercise the rights referred to in Article 13 and/or for any clarifications regarding the protection of personal data, is Maurizio delloRusso and can be contacted at the address: [privacy@gesac.it](mailto:privacy@gesac.it)