



# Riva Acciaio S.p.A. Whistleblowing Notice

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This document is aimed at all potential whistle-blowers and its purpose is to inform you as to why **Riva Acciaio S.p.A.** (hereafter referred to as “Data Controller”) collects and uses your personal data in relation to whistleblowing on the matter of offences or irregularities pursuant to Legislative Decree n. 24/2023 on the “Implementation of EU directive 2019/1937”, referred to as the Whistleblowing Directive.

Riva Acciaio S.p.A., pursuant to EU Regulation 679/2016, which has been applicable since 25 May 2018 – General Data Protection Regulation (“GDPR”) and pursuant to the Legislative Decree n. 196/2003 – Code regarding the protection of personal data (“Privacy Code”), as amended by the Legislative Decree 101/2018 (hereafter, the Privacy Code and GDPR shall be referred to collectively as the “Applicable Legislation”), recognises the importance of personal data protection and considers said protection by them to be one of their priorities.

The Data Controller, pursuant to art. 4 of the Legislative Decree n° 24 of 10 March 2023, has implemented the following **channels for the management of internal whistleblowing**, which may be directed by data subjects to a third impartial and independent party that is external to the organisation (“Channel Manager”):

a) Written communication	b) Oral communication	c) Direct meeting within 15 days
by sending an email to the following email address: <a href="mailto:ra_whistleblowing@complegal.it">ra_whistleblowing@complegal.it</a>	by sending a voice message to the following number: 800 134 307	Please use the aforementioned means of communication

## 1. IDENTITY AND CONTACT DETAILS

**Riva Acciaio S.p.A.**, with registered office at Milan Viale Certosa 249, tel. 02307001, email address [privacyitalia.ra@rivagroup.com](mailto:privacyitalia.ra@rivagroup.com), is the Data Controller for data processing.

The Data Protection Officer (DPO) is GetSolution, the company of Paola General, with registered office at Via Fabio Filzi, 23 - 20124 Milan, tel. 0239661701, which can be contacted by email at [dpo-grupporiva@getsolution.it](mailto:dpo-grupporiva@getsolution.it), for any information regarding the processing of personal data by the Data Controller.

## 2. TYPE OF DATA PROCESSED

In the event that there is whistleblowing by a potential whistle-blower, according to the modalities for said whistleblowing, the personal data that is processed may belong to following categories:

**a) Written communication** by sending an email to the email address provided:

- Identification data (name and surname), email address, telephone number or postal address, existing relationship with the company (employee, associate, etc.) and whether the relationship is ongoing, whether it was terminated or whether it has not yet started.
- If need by, further information related to the unlawful conduct reported (for example: personal data regarding the whistle-blower or other persons involved in the whistleblowing).



**b) Oral communication** by sending a voice message to the assigned telephone number:

- Identification data (name and surname), email address, telephone number or postal address, existing relationship with the company (employee, associate, etc.) and whether the relationship is ongoing, whether it was terminated or whether it has not yet started.
- If need by, further information related to the unlawful conduct reported (for example: personal data regarding the whistle-blower or other persons involved in the whistleblowing).

**c) Direct meeting within 15 days**

- Identification data (name and surname), email address, telephone number or postal address, existing relationship with the company (employee, associate, etc.) and whether the relationship is ongoing, whether it was terminated or whether it has not yet started.
- If need by, further information related to the unlawful conduct reported (for example: personal data regarding the whistle-blower or other persons involved in the whistleblowing).

The Data Controller invites the Data Subject not to supply personal data that is part of the special categories of personal data under art. 9 of the GDPR (for example, data used to detect belonging to special categories), unless strictly necessary for the purpose of the whistleblowing, and/or judicial data pursuant to art. 10 of the GDPR.

For the purposes of applying the principle of definitive cancellation and minimisation of personal data, pursuant to art. 5 of the GDPR, the personal data that is not manifestly useful for the processing of the whistleblowing shall not be collected and, should said data be collected accidentally, it shall be deleted immediately.

### 3. PURPOSES AND LEGAL BASIS OF THE DATA PROCESSING

The personal data shall only be used for specific purposes and, in any case, there shall always be a legal basis that allows for said processing.

The purposes and legal bases for data processing are listed in the following table:

PROCESSING PURPOSE	LEGAL BASIS
Implementing the necessary preparation measures in order to verify the validity of the information, which is the object of the whistleblowing, and to take consequent measures as stipulated in the specific procedure provided by the Data Controller.	Fulfilling a legal obligation (pursuant to art. 6, clause 1, letr. b) of the GDPR; Legislative Decree n. 24/2023 on "Implementation of EU directive 2019/1937); any potential use of special personal data shall be pursuant to art. 9, letr. B) of the GDPR.
Exercising the right to take legal action and be defended to enforce or defend the rights of the Data Controller (including as a preventative measure).	The legitimate interest of the Data Controller (pursuant to art. 6, clause 1, letr. f) of the GDPR); for any potential Special Personal Data, please refer to art. 9, letr. F) of the GDPR.

Supplying personal data is optional. However, failing to supply said data may compromise the investigation related to the whistleblowing.

Please note that the identity of the whistle-blower and any other information that may be inferred thereof, whether directly or indirectly, may not be revealed to anyone other than the Channel Manager without the express consent of said whistle-blower.



#### **4. MODES OF PROCESSING**

Personal data shall be processed via electronic / information technology instruments in accordance with the principles and the rights of the data subject, as stipulated by the GDPR. Please also note that personal data that is not manifestly useful for the processing of the whistleblowing shall not be collected and, should said data be collected accidentally, it shall be deleted immediately.

The Data Controller has adopted a series of safety measures (both technical and organisational) to improve the protection, security, integrity and accessibility of your personal data by applying end-to-end encryption techniques to all of your data in transit and stored data in order to protect the privacy of the identity of the whistleblower, the person involved or mentioned in the whistleblowing, as well as the content of said whistleblowing and any relevant documents.

#### **5. DATA SOURCE**

The personal data acquired has been provided directly by the potential whistle-blower. Otherwise, the Data Controller may acquire further personal data from the data pool that is already available to them or for the purpose of preliminary measures to be carried out to verify the validity of the whistleblowing content, whilst always remaining compliant with legal provisions.

#### **6. DATA RECIPIENTS**

The Data Controller has employed the company Complegal S.r.l., an external, independent, autonomous and competent operator, to receive and manage any whistleblowing related to relevant unlawful conduct pursuant to applicable legislation, for the Riva Group, and Complegal S.r.l., has entered into a written agreement with the Data Controller regarding their duties as a third party, pursuant to art. 28 of the GDPR.

Unless it is necessary to begin preliminary measures following whistleblowing and to fulfil legal obligations, the personal data you provided shall be made accessible only and exclusively to those within the Company who require said data to carry out their role/task in relation to the process of receiving, analysing, investigating and managing any whistleblowing and any potential consequential measures. Said entities have been appropriately trained and authorised to carry out the data processing.

Finally, if need be and in compliance with legal requirements, the personal data may also be transmitted to other autonomous data controller entities (e.g. the judicial authority, ANAC).

#### **7. DATA STORAGE PERIOD**

The personal data related to the whistleblowing shall be stored for the period of time that is strictly necessary for the processing of said whistleblowing, in compliance with legal obligations or to allow the Data Controller to safeguard their rights and interests or the rights and interests of third parties (e.g. legal defence).

In any case, once 5 (five) years have elapsed since the date when the final outcome of the whistleblowing procedure has been communicated, the personal data shall be definitively destroyed or made anonymous in an irreversible and secure manner.

#### **8. DATA TRANSFER**

Your personal data shall be processed within the European Economic Area (EEA) and it shall be stored and protected by a server located in the EEA.

#### **9. RIGHTS OF THE DATA SUBJECT**

Data subjects have the right to obtain access to their personal data and have said data rectified or deleted, limit the processing of said data or refuse said data to be processed (art. 15 et seq of the Regulation).

Data subjects may exercise their rights over their data by using the aforementioned communication tools



(email address, telephone).

Pursuant to article 2-undecies of the Privacy Code (implementing article 23 of the GDPR), please note that the aforementioned rights may not be exercised by data subjects (upon issuing a request to the Data Controller or issuing a complaint pursuant to article 77 of the GDPR) in the event that exercising said rights may jeopardise the confidentiality of the identity of the whistle-blower in real and actual terms, or in the event that said rights jeopardise the exercise of a right in a judicial court or the performance of investigations for defence purposes. The data subjects, who deem that the processing of their personal data, which was reported to them to have been carried out through this website, represents a violation of the provisions stipulated in the Regulation, have the right to lodge a complaint, as provided for in art. 77 of said Regulation, or to take action before the competent courts (art. 79 of the Regulation).

The company does not process data using automated decision-making processes (art. 22 of the GDPR), or profiling techniques.

#### **UPDATES**

This Notice was updated on 12/07/2023 and may be subject to further updates.



[www.rivagroup.com](http://www.rivagroup.com)

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