






CONFIDENTIALITY	INTEGRITY	AVAILABILITY	TRACEABILITY
INTERNAL	MEDIUM	MEDIUM	LOW


Information required by Regulation (EU) 2016/679


PREMISE	
<p>Friulpress-Samp SpA considers the protection of personal data of fundamental importance, ensuring that processing takes place in full compliance with the protections and rights recognized by Regulation (EU) 2016/679 (hereinafter the "<i>Regulation</i>" or "<i>GDPR</i>"), by other national and EU rules as well as the provisions of the data Protection Authorities. The processing of personal data operated by Friulpress-Samp SpA is inspired by the principles of lawfulness, correctness and transparency and Data Controller uses the minimum set of data for the strictly necessary period of time. Friulpress-Samp SpA processes data as accurate and up to date as possible, preserving security and as established in GDPR, following principle of transparency, and provides the following information.</p>	

	<p>Data Controller</p>  <p>Friulpress-Samp SpA</p>	<p>Friulpress-Samp SpA Via zona industriale 5/1 33079 Sesto al Reghena (PN) Tel: +39 0434-693211</p>
	<p>Data Protection Officer (DPO)</p>	<p>Data Protection Officer c/o Friulpress-Samp SpA DPO@HDT-IT2.com</p>

	ORIGIN AND TYPE OF PERSONAL DATA PROCESSED
<p>The data are processed, with protection of professional secrecy, on the basis of the "<i>Whistleblowing Policy</i>" and, where provided, your identification/personal data strictly necessary to verify the validity of the Report and to allow its management will also be processed.</p> <p>The processing, however, complies with the principle of data minimization and storage limitation.</p>	

	PURPOSE	LEGAL BASIS	NOTES & RETENTION TIMES
	<p>management of reports regarding alleged irregularities or offenses of which one has become aware within the scope of the employment or collaboration relationship</p>	<p>legal obligation arising from the provisions of the art. 6 of Legislative Decree no. 231 of 2001, as amended by Law no. 179 of 2017, containing "Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship".</p>	<p>The personal data collected will be kept under our ownership for the time necessary to ascertain the validity of the Report and, if necessary, to adopt consequent disciplinary measures and/or to resolve any disputes initiated following the Report. Subsequently, such data will be destroyed or anonymized if necessary for statistical or historicization purposes.</p>
	<p>Exercise of a right in court for the defense of the interests of the Data Controller or a third party</p>	<p>ascertain, exercise or defend a right in court (art. 9.2.f).</p>	<p>The data are kept for the maximum time established by the applicable legal provisions regarding the limitation of rights and/or expiration of the action and, in any case, for the entire duration of the judgment and until the judgments in each order have become final. and grade.</p>

	MANDATORY PROVISION OF DATA
<p>The provision of your personal data is not mandatory, but any refusal could make it impossible or extremely difficult to ascertain the validity of the Report made, where the latter is not detailed, based on precise and consistent elements, does not have any object verifiable facts and/or does not contain all the useful elements to carry out the aforementioned assessment.</p>	

	RECIPIENTS AND SUBJECTS AUTHORIZED TO PROCESS
<p>Without prejudice to the communications and disseminations ordered by orders of the Authorities or foreseen by the Law, the recipient of your personal data is the Supervisory Body (" <i>OdV</i> ") whose members, in compliance with</p>	

CONFIDENTIALITY	INTEGRITY	AVAILABILITY	TRACEABILITY
INTERNAL	MEDIUM	MEDIUM	LOW

the provisions of the current legislation on the subject and the "*Whistleblowing Policy*" adopted by the Company, are required to guarantee confidentiality regarding the identity of the Whistleblower.

Whistleblower's personal data may be disclosed to the manager of the function in charge of the disciplinary proceedings and/or to the accused, exclusively in cases where:

- there is your express consent;
- or the contestation of the disciplinary charge is based solely on your Report and knowledge of the identity of the Whistleblower is absolutely indispensable for the defense of the accused.

The data may be processed either by subjects qualified as **data Controller** pursuant to art. 4.8 and art. 28 of the GDPR and by subjects **authorized to process** pursuant to art. 29, who operate under the direct authority of the Data Controller (employees and collaborators in various capacities): in fact, in the phase of ascertaining the validity of the whistleblowing, where it is necessary for carrying out the investigative activities due to the characteristics of the investigations to be carried out, Whistleblower's personal data may be forwarded to other internal/external structures. In such a case, those who have been involved in supporting the Supervisory Body and/or the **RPCT** are subject to the same duties in order to guarantee the confidentiality of the identity of the Whistleblower. In any case, Whistleblower's personal data will not be disclosed.



TRANSFER OF PERSONAL DATA TO COUNTRIES NOT BELONGING TO THE EUROPEAN UNION

The Data Controller makes use of professional services offered by some suppliers, adequately qualified as Data Processors. This may result in the data being transferred outside the EU territory but only:

- towards countries subject to an adequacy decision by the European Commission or the Guarantor (art. 45 of the GDPR);
- in countries located outside the EEA, subject to signing the Standard Contractual Clauses adopted/approved by the European Commission pursuant to art. 46, 2, letter. c) and d). In the event that this occurs, a copy of the guarantees referred to in art. 46, par. 2, letter. c) and d), used by the Data Controller can be obtained by writing an e-mail to the DPO;
- towards entities that have an international structure and which have provided for the signing, at group level, of specific Binding Corporate Rules, pursuant to art. 47 of the GDPR;
- if the Data Subject has given his/her explicit consent, in execution of a contract or pre-contractual measures, to ascertain or defend a right in court, to protect the vital interests of a Data Subject or of other persons and the Data Subject cannot provide his/hers consent (art. 49 of the GDPR).



RIGHTS OF DATA SUBJECT (ARTICLES 15-22 OF THE GDPR)

As a reporting person, you are configured as an "interested party" pursuant to the GDPR, and have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you is being processed and, possibly, to request access to personal data (art. 15 of the GDPR), rectification (art. 16 of the GDPR), cancellation (art. 17 of the GDPR) or limitation of processing (art. 18 of the GDPR), as well as having the right to the portability of data (art. 20 of the GDPR).

The interested party has the right to object to the processing carried out on the basis of the art. 6, paragraph 1 letters e (*execution of a task of public interest or connected to the exercise of public powers*) and f (*legitimate interest*), for reasons connected to your particular situation (art. 21 of the GDPR).

The interested party also has the right not to be subjected to a decision based solely on automated processing, if it produces legal effects concerning him or if it significantly affects him (art. 22 of the GDPR).

At any time, the interested party has the right to revoke the consent, without prejudice, however, to the lawfulness of the processing based on the consent given before the revocation.

Among the rights of the interested party there is also the right to lodge a complaint with a Supervisory Authority.