PRIVACY POLICY
PURSUANT TO ART. 13 AND 14 OF REGULATION (EU) NO. 2016/679

In compliance with Legislative Decree 24/2023 on the "Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report violations of Union law and provisions on the protection of persons who report violations of national legislative provisions" ("Legislative Decree 24/2023"), Marvon S.r.l. has activated a platform to allow the reporting of violations under Legislative Decree 24/2023 by individuals provided for by the legislation, known as whistleblowers.
The channel also allows for the transmission of anonymous reports. However, if the Whistleblower chooses to transmit their personal data, if documents, attachments, or the report contain personal data relating to the Whistleblower, the reported party, and/or third parties, the company will process the personal data contained therein for the management of the whistleblowing reports.
Therefore, we would like to inform you in advance, in accordance with Articles 13 and 14 of Regulation (EU) 2016/679, that this processing will be based on the principles of lawfulness, fairness, and transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, confidentiality, and accountability, as well as the protection of your privacy and your rights.

1. DATA CONTROLLER

The data controller is Marvon S.r.l., with registered office at Via Gargnà 6, 25078 Vestone (BS) EMAIL: marvon@marvon.com.

2. TYPES OF DATA PROCESSED

The receipt and management of reports involve the processing of personal data, common data (personal data, contact details, data related to work activity, and/or any other information related to the alleged or presumed illicit conduct), as well as, depending on the content of the reports and the acts and documents attached to them, the processing of so-called "special" personal data (data concerning health, sexual orientation, political opinions, or trade union membership, as referred to in Article 9 of the GDPR) and personal data relating to criminal convictions and offenses (as referred to in Article 10 of the GDPR).

3. PURPOSE OF THE PROCESSING FOR WHICH THE DATA ARE INTENDED AND BASE GIURIDICA DEL TRATTAMENTO DATI

The personal data is processed for the following purposes:
a) to allow you to make a Report in accordance with the current whistleblowing legislation;

b) the management of Reports in accordance with the current whistleblowing legislation, including investigative activities aimed at verifying the validity of the reported facts and the adoption of consequent measures;
c) to comply with any requests from the Judicial Authorities, ANAC or the Data Protection Authority;
d) to ascertain, exercise or defend in court and/or out-of-court the rights or interests of the Data Controller or third parties.
For the purposes mentioned in points a) and b), considering the applicable legislation (Legislative Decree no. 24/2023), the legal basis is therefore represented by the fulfillment of a legal obligation to which the data controller is subject (Legislative Decree no. 24/2023).
The processing of special categories of personal data is allowed under Article 9(2)(b) of the GDPR.
The processing of judicial data is allowed under Article 10 of the GDPR, as it is authorized by a Law (Legislative Decree no. 24/2023).
For the purposes mentioned in points c) and d), the legal basis for the processing is the pursuit of a legitimate interest of the data controller or third parties.

4. NATURE OF DATA PROVISION

The provision of personal data is optional as the company's platform allows for the transmission of anonymous reports as provided for by Legislative Decree 24/2023.

In cases referred to in Article 12(2) of Legislative Decree 24/2023, the identity of the Whistleblower and any other information from which their identity can be directly or indirectly inferred may only be disclosed with the express consent of the Whistleblower itself to persons other than those competent to receive or follow up on the Reports, expressly authorized to process such data.

5. DATA RETENTION PERIOD AND TRANSEFR

Personal data is kept for the time necessary for the management of the whistleblowing and in any case no longer than five years from the date of communication of the final outcome of the whistleblowing procedure, unless retention is necessary to fulfill a legal obligation or an order from the Authority.
Your personal data will be processed within the EU.

6. PROCESSING METHODS

The processing will be carried out manually and electronically.
Specific security measures are observed to prevent data loss, unlawful or incorrect use, and unauthorized access.
The Data Controller adopts appropriate security measures to protect your data and ensure the confidentiality of the report.

7. AUTOMATED DECISION-MAKING AND DATA DISCLOSURE

There is no automated decision-making process. The personal data processed will not be disclosed.

8. RECIPIENTS OF THE PROCESSING

Your personal data may be shared with:

• The Company's Whistleblowing Committee;

• The provider that offers the dedicated web platform for whistleblowing;

• In case of consent, internal functions involved in the investigation/verification of the reported facts;

• External consultants, if involved in the investigation and management of the whistleblowing;

• Subjects, bodies, entities, or Authorities to whom communication is mandatory under the provisions of law or regulation.

In such cases, these subjects will be appointed as external data processors pursuant to Article 28 of the GDPR or authorized to process data pursuant to Article 29 of the GDPR and Article 2 *quaterdecies* of Legislative Decree 196/2003. A list of appointed data processors is available from the Data Controller.

9. EXERCISE OF DATA SUBJECTS RIGHTS

Please note that, in accordance with Articles 15 to 22 of the GDPR, it is possible to exercise, within the limits set out in Article 2-undecies of the Privacy Code and Legislative Decree 24/2023, the right to:

a) access personal data;

b) rectify them in case of inaccuracy;

c) erase the data;

d) restrict processing;

e) the right to data portability, i.e. to receive the personal data provided in a structured, commonly used, and machine-readable format and to transmit them to another data controller without hindrance;

f) the right to object to processing, where applicable.

Furthermore, data subjects have the right to lodge a complaint with the Data Protection Authority.

Requests can be addressed to the Data Controller's contact details.

Data Controller
Marvon S.r.l.