

**NOTICE ON THE PROCESSING OF PERSONAL DATA  
WHISTLEBLOWING REPORTING PROCEDURE**  
Pursuant to art.13 of Regulation EU 2016/679 of 27/04/2016

Varcolor S.r.l., would like to inform you on the following:

**Data Controller and Data Protection Officer**

The Data Controller is Varcolor S.r.l., registered office at Via dell'Industria, 22 – 36050 QUINTO VICENTINO (VI). The Data Controller has appointed its Data Protection Officer who can be contacted at this email address: [dpo@varcolor.it](mailto:dpo@varcolor.it).

**Purposes of the processing and legal basis of the processing**

The personal data you provide in your report will be processed only by the manager appointed by the company with the utmost confidentiality as required by Legislative Decree 24 of 2023. In particular, all personal data in the report and which regard the reported party, the facilitator and other related parties will be handled as confidential. The personal data collected will be processed only for taking in charge the report and for the appropriate checks and investigations that will follow. Please note that anonymous reports can be entered.

The legal basis is the implementation of the legal obligation (art. 6 letter c) of Regulation EU 2016/679 and set out in Legislative Decree 24 of 2023 and Law 179 of 2017.

**Compulsory or optional nature of providing data and consequences of a refusal to provide data**

The identification data of the party filing the report are processed should the reporting party opt for a non-anonymous report; any further personal data included in the report is additional and strictly related to the content of the report itself. Personal data of special nature may therefore also be included by the reporting party.

**Data processing methods**

Personal data processing is performed through the operations specified in art. 4 no. 2) GDPR for the purposes described above, both in hard copy and electronic form, by means of electronic or otherwise automated tools, in compliance with the legislation in force in particular on confidentiality and security and in accordance with the principles of fairness, lawfulness and transparency and protection of the rights of the reporting party and of the other parties involved in the report. Processing is directly performed by the data controller's organization, by its managers and/or officers. The signalling channel is protected by encryption. Please take note that there is no tracking of signalling channels.

**Communications with third parties**

Personal data are managed only by BDO Advisory Services S.r.l. which has been appointed Data Controller for this purpose; the company has therefore opted for external management of the signalling channel.

**Retention period of personal data**

Personal data will be retained for the entire duration of the undertaking of the report and, in any case, for no longer than five years starting from the date in which the final result of the reporting procedure has been communicated.

**Transfer of data**

Personal data will be stored on servers located inside the European Union. It is in any case understood that the Controller, if necessary, will be entitled to move the servers also outside the EU. In such a case, the Data Controller hereby ensures that the transfer of data outside the EU will take place in accordance with the applicable legal provisions, subject to the conclusion of the standard contractual clauses provided for by the European Commission.

**Rights of the data subject**

In your capacity as data subject, you have the rights set out in Art. 15-21 GDPR, namely the right to access your personal data, to request its rectification or restriction, updating if incomplete or erroneous, and deletion if collected in breach of the law, as well as to object to its processing, subject to the existence of legitimate reasons on the part of the Data Controller.

If you wish to exercise your rights under Art. 15-21 of the GDPR or for any questions or information regarding the processing of your data and the security measures taken, you may in any case send your request to the following address: [privacy@varcolor.it](mailto:privacy@varcolor.it).

Quinto Vicentino, 15/12/2023