



**SMITEC S.p.A. con Unico Socio**  
Società sottoposta a direzione e coordinamento da SMIGROUP S.p.A.  
Società appartenente al Gruppo Iva SMI INDUSTRIES  
**Sede amministrativa:**  
Via Carlo Ceresa, 10 - 24015 San Giovanni Bianco(BG) ITALIA  
Tel. +39 0345 40.111 - Fax: +39 0345 40.209 - <http://www.smitec.it>  
C.F. 03790400166 P. IVA IT04471940165 - R.E.A. 408704  
Iscr.Reg.Imprese 03790400166 - Cap. Soc. 200.000 i.v.  
**Sede legale:** Via Monte Grappa, 7 - 24121 Bergamo (BG) - ITALIA  
**Unità produttiva:** Viale Vittorio Veneto, 4 - 24016 San Pellegrino Terme(BG) ITALIA Tel. +39 0345 40.800 - Fax: +39 0345 40.809

## INFORMATION PURSUANT TO PERSONAL DATA PROTECTION LEGISLATION - WHISTLEBLOWING

### Introduction

Pursuant to Articles 13 and 14 of EU Regulation No. 2016/679 (General Data Protection Regulation, hereinafter GDPR) and Legislative Decree No. 24/23, Smitec S.p.A hereby informs the stakeholders about the use of their personal data, which is processed for the purposes indicated below.

### Data Controller

The Data Controller for personal data is Smitec S.p.A., based in San Pellegrino Terme (BG), via Vittorio Veneto 4, 24016.

### Data processed

1. Common personal data (referred to in Article 4 (1) of the GDPR) of the reporter, in the event of non-anonymous reports, and of any person involved or mentioned in the report.
2. Special categories of data referred to in Article 9 of the GDPR, if included in the report.

### Purpose of processing and legal basis

The data provided by the reporter, with the purpose of revealing alleged misconducts committed by individuals who interact with the Data Controller in various capacities, is processed in order to carry out all the investigations required to verify the merits of the report and to adopt the relative measures. The legal basis for the processing is Legislative Decree No. 2 of March 10, 2023 in "Implementation of Directive 2019/1937 of the European Parliament and Council of October 23, 2019 on the protection of people reporting breaches of Union law and containing provisions regarding the protection of people reporting breaches of national provisions."

### Data processing methods

Data collection is performed in accordance with the principles of relevance, comprehensiveness and not exceeding the purposes for which the data is processed. Personal data is processed in compliance with the principle of lawfulness, fairness and transparency, referred to in Article 5 of the GDPR, by means of computer systems and paper supports and adopting all the measures needed to ensure the stakeholder's confidentiality.



**SMITEC S.p.A. con Unico Socio**  
Società sottoposta a direzione e coordinamento da SMIGROUP S.p.A.  
Società appartenente al Gruppo Iva SMI INDUSTRIES  
**Sede amministrativa:**  
Via Carlo Ceresa, 10 - 24015 San Giovanni Bianco(BG) ITALIA  
Tel. +39 0345 40.111 - Fax: +39 0345 40.209 - <http://www.smitec.it>  
C.F. 03790400166 P. IVA IT04471940165 - R.E.A. 408704  
Iscr.Reg.Imprese 03790400166 - Cap. Soc. 200.000 i.v.  
**Sede legale:** Via Monte Grappa, 7 - 24121 Bergamo (BG) - ITALIA  
**Unità produttiva:** Viale Vittorio Veneto, 4 - 24016 San Pellegrino Terme(BG) ITALIA Tel. +39 0345 40.800 - Fax: +39 0345 40.809

### Categories of individuals authorized to data processing and to whom data can be disclosed

For the pursuit of the described activities, the personal data provided will be treated by the report manager as well as, if deemed necessary, by other specifically authorized subjects whose cooperation could be indispensable to the activities resulting from the report.

This is without prejudice to the communication of data requested by public security authorities, judicial authority or other public subjects for purposes of defence, State security and investigation of offences and/or alleged crimes. The aforementioned subjects act as "autonomous" Data Controllers or Data Processors pursuant to Article 28 of the GDPR.

### Retention of personal data

The reports received and the personal data provided will be archived and catalogued by the report manager and kept for up to five years after completion of the activities resulting from the report.

### Stakeholders' rights

Stakeholders, pursuant to Articles 15 to 22 of the GDPR, have the right to access their personal data at any time and to ask for the rectification or cancellation of the data or their treatment restriction; in addition, they can oppose to the treatment of their personal data. The request must be submitted to the manager using the same channels reserved to reporting. Stakeholders who believe that the processing of personal data infringe the GDPR may lodge a complaint with the European Data Protection Supervisor, as declared by Article 77 of the GDPR, or act in compliance with Article 79 of the GDPR.