Privacy Policy pursuant to Regulation (EU) 2016/679

In compliance with Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR), Bluenext Srl, as data controller, provides the following information regarding the processing of personal data of potential whistleblowers, reported persons, facilitators and other individuals potentially involved in the management of reports.

1. **Purpose of Personal Data Processing**

   The processing of personal data may concern various categories of information relating to natural persons, including special categories of personal data (Article 9, GDPR) and personal data relating to criminal convictions and offences (Article 10, GDPR). The legal basis for the processing is the fulfilment of legal obligations (Art. 6, paragraph 1, letter c, GDPR) and, with regard to special and criminal data, the legal provisions indicated in Articles 9, paragraph 2, letter g) and 10, combined with Art. 2-octies, Legislative Decree 196/2003.

2. **Recipients of Personal Data**

   The reporting person's identification data will be accessible exclusively to the specialised external company, acting as data processor pursuant to Art. 28 of the GDPR, and to professional, technological or telecommunications sub-suppliers. If the reporting person expressly consents, the data may be shared with the offices of the Data Controller. No further communication of personal data is envisaged, except in cases where this is necessary to assert or defend a right of the data controller, the data processor or third parties. No personal data will be transferred or stored outside the European Economic Area.

3. **Retention of Personal Data**

   Personal data will be stored for a period not exceeding five years from the date of notification of the final outcome of the reporting procedure. Data that is not relevant to the processing of a specific report will be deleted immediately.

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4. **Rights of the Data Subject**

   Every data subject has the right to access their personal data and to exercise the rights provided for in Articles 15 et seq. of the GDPR. However, the above rights cannot be exercised if this would result in actual and concrete prejudice to the confidentiality of the identity of the reporting person. The rights to withdraw previously given consent are also reserved.

5. **Contacts and Competent Authority**

   To exercise their privacy rights, data subjects may contact the Data Controller using the contact details provided above. It is also possible to contact the Data Protection Authority. Furthermore, data subjects have the right to contact the Data Protection Authority directly for any matter relating to the processing of their personal data.

We remain available for any clarification or further information regarding this privacy policy.

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