



STATEMENT ON PERSONAL DATA PROCESSING

Acquisition and management of reports pursuant to Legislative Decree No. 24/2023 (so-called Reporting - Whistleblowing) - Consorzio Vacche Rosse S.C.A.

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Dear Data Subject,

the General Data Protection Regulation (GDPR) in Articles 13 and 14 imposes the obligation to inform the data subject, in case of collection of his/her data, about the basic elements of the data processing.

DATA CONTROLLER

The data controller is **Consorzio Vacche Rosse S.C.A.**, VAT Number: IT01463760353, established in Via F.lli Rosselli 41/2 42123 Reggio Emilia (RE) - ITALY, e-mail address: info@consorziovaccherosse.it (from here also "Data controller" o "Controller").

PURPOSES OF PROCESSING	LEGAL BASIS
ACQUISITION AND MANAGEMENT OF REPORTS - WHISTLEBLOWING	
Acquisition and management of reports made in compliance with the Legislative Decree No. 24/2023, concerning: A. Illegal conduct and/or violation of the Organizational and Management Model drafted pursuant to Legislative Decree; B. Conduct, acts or omissions that harm the public interest or corporate integrity specified by Legislative Decree No. 24/2023; C. Verification of the reported facts and adoption of consequent measures.	<ul style="list-style-type: none">• Compliance with legal provisions (Legislative Decree No. 24/2023);• Legitimate interest of Data Controller in protecting itself from responsibility for the commission of crimes provided for by the Legislative Decree;• Art. 9 par. 2 (b) and f) GDPR;• Art. 10 GDPR.

DATA PROCESSING METHODS, PROVISION AND E SOURCE OF DATA COLLECTED FROM THIRD PARTIES

The personal data processing activities to achieve the aforesaid purposes are performed in compliance with the rules provided for by the Legislative Decree No. 24/2023 and EU Regulation 2016/679 (GDPR).

The information provided during the submission of a whistleblowing report will be acquired through computer tools and/or through additional methods indicated within the Organizational and Management Model drafted pursuant to Legislative Decree 231/2001, and in the whistleblowing procedure. Other information can also be found on the company's website (<https://www.consorziovaccherosse.it/wp-content/uploads/Procedura-Whistleblowing.pdf>).

The reports will be processed to ensure the confidentiality of the identity of the reporting person, the person involved and the person otherwise mentioned in the report, as well as the content of the report and related documentation.

The data controller undertakes to process in a lawful, fair and transparent manner the personal data needed to manage the report, and to adopt security measures proportionate to the risk determined by the processing.

By submitting a whistleblowing report, the following types of personal data may be collected, also from third parties:

- first name, last name, and contact information (e.g., e-mail address or phone number) of the reporting person and/or persons involved;
- information about the facts and circumstances that are the subject of the whistleblowing report.

The categories of the third parties other than the data subject, who may transmit information to the data controller, are:

- facilitator, who may transmit information relating to the reporting person and/or the person involved;
- reporting person, who may transmit information relating to the person involved.

Further information and details on how the data is used can be requested at the time of collection of the information itself, or by contacting the Data Controller through the contact details within this policy.

DATA PROVISION AND CONSEQUENCES OF REFUSAL TO PROVIDE THE DATA

The provision of personal data relating to the reporting person is optional. However, failure to provide such data could affect the investigation of the report: as established by law, anonymous reports will only be considered if they are sufficiently substantiated and provided with full details, so as to bring out facts and situations related to specific contexts.

PERSONAL DATA COMMUNICATION AND TRASMISSION OF DATA TO THIRD PARTIES

Personal data provided may only be accessible to those who have a need to access and process them, due to their role/task in relation to the reporting investigations (e.g., to members of the Vigilance Committee). These subjects are appropriately trained in order to avoid loss, access to the data by unauthorized parties or unauthorized processing of the data themselves and, more generally, in relation to personal data protection obligations. If they are external to the organization, they are appointed as data processors on behalf of the data controller.

Personal data may also be transmitted to other autonomous data controllers, according to laws or regulations (e.g., Legal Authorities, ANAC).

DATA RETENTION

The reports and the documentation relating to their management will be retained for a maximum of five years from the date of communication of the final outcome of the report, unless further retention is required in case of legal proceedings or requests by the Authorities or initiation of litigation or for the different period of time prescribed by law.



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DATA SUBJECT'S RIGHTS

We inform you about the existence of your rights, particularly to request **access** to your personal data, **rectify and cancel** them, **restrict the data processing** concerning yourself, **object** to their further processing, **data portability** where applicable, analytically described and subject to the limitations set forth in Articles 15 to 22 of the GDPR and Articles 2-undecies and 2-duodecies of Legislative Decree 196/03 integrated with the amendments made by Legislative Decree 101/18 of harmonization to the GDPR. In the event that you are the Involved Person, the rights set forth in Articles 15 to 22 of the GDPR may not be exercised in case of actual and concrete prejudice to the confidentiality of the identity of the reporting person and/or to the pursuit of the objectives of compliance with the regulations on reporting misconduct.

To request more information, to exercise your rights and get acknowledge about third parties to whom data may be shared with, you can write to the following e-mail address: **info@consorziovaccherosse.it**.

In order to facilitate the detection of your requests about your rights, we suggest specifying in the e-mail subject the following statement: "Request to exercise a data subject right".

Within the communication it's important to clarify your identity, the type of your relationship with the Data Controller, the right you're asking to exercise and all the further information useful to identify the data or the processing involved in your requests. You can also use the form provided by the Italian Supervisory Authority available at the following link: <https://www.garanteprivacy.it/home/modulistica-e-servizi-online>. You can also use the form provided by the Italian Supervisory Authority available at the following link: <https://www.garanteprivacy.it/home/modulistica-e-servizi-online>.

We remind you that by law, the interested party will be provided with a response within one month, a term that can be extended up to three months in the event of a particularly complex request (notifying the data subject of this extension).

You are entitled to file your complaints with the Italian control authority at the Supervisory Authority address for the protection of personal data, by sending a certified e-mail to the address protocollo@pec.gdpd.it or a registered letter addressed to: Piazza Venezia 11, 00187 Roma (Italy), or with the control authority of another EU member country.

Reggio Emilia, 13/05/2025

Consorzio Vacche Rosse S.C.A.
(Data controller)