



## **GVS SPA – PRIVACY – INFORMATION ON PERSONAL DATA PROCESSING**

### **WhistleB. platform – Whistleblowing**

In accordance with art. 13, UE Reg. 679/2016, GVS SPA, with its subsidiaries, informs of the following:

**1. CONTROLLER OF THE DATA PROCESSING:** The Controller of the data processing is GVS SPA, represented by legal representatives, address via Roma n. 50, Zola Predosa (BO), ITALY, e-mail [privacy@gvs.it](mailto:privacy@gvs.it). The WhistleB. platform is a service provided by Navex Global Inc. and its subsidiaries.

**2. PROCESSES DATA:** Whistleblowing reports – personal data of employees, suppliers, customers and others persons in business relationship with GVS.

**3. PURPOSES OF THE PROCESSING:** Compliance with laws. GVS shall process data for the following purposes: (i) to conduct investigations starting from reports and take corrective actions; (ii) to comply with legal and regulatory obligations; (iii) to pursue GVS's interest in the defense of claims or legal actions. Data may be processed electronically within IT systems, and manually, in paper form. Data will be processed and stored for its whole lifecycle, ensuring security and confidentiality of the same in compliance with principles of fairness, lawfulness and transparency and in accordance with the provisions of applicable laws and regulations. In any case, the platform accept reports in an anonymous way too.

**4. CONSEQUENCES OF FAILURE TO PROVIDE DATA:** It is not necessary to provide Data by submitting a report. However, not providing Data may prevent us from conducting investigations or make them less effective.

**5. RECIPIENTS OF PERSONAL DATA:** The GVS employees that, in compliance with GVS Whistleblowing policy, are in charge for the management of whistleblowing reports. More, Data may be shared and communicated to GVS group subsidiaries and to trusted external parties, service providers and business partners, based in and outside the European Union, which are under specific contractual obligation and may use it solely for the fulfilment of the purposes listed above. Data may be communicated to third parties to comply with legal obligations, to operate and maintain security, protect GVS's rights or property, to respond to order of Public Authorities.

**6. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY:** Only for purposes related to the compliance with laws. In order to perform Data processing activities as detailed above, GVS may transfer Data in countries outside of the European Union, including storing such Data in digital or physical databases managed by entities acting on our behalf. Database management and Data processing are limited to the purposes of the processing and are carried out according to applicable data protection laws and regulations. In case Data are transferred outside of the European Union, GVS shall use any appropriate contractual measures to guarantee adequate protection of the Data, including standards adopted by the EU Commission.

**7. PERIOD OF STORAGE:** The time necessary to manage the report. In any case a maximum of 5 years after the report or other provided by law. When Data are no longer necessary for the purposes for which they are processed, Data are deleted or kept in a form which does not permit the identification of data subjects, provided that GVS is not legally required or permitted to hold such Data. GVS may continue to store Data for a longer period, as may be necessary to protect our interests related to potential liability connected to the provision of the services or products or the processing of Data.

**8. NECESSARY REQUIREMENT OF PERSONAL DATA PROVISION:** In case of report, the processing is mandatory by law.

**9. DATA SUBJECT'S RIGHTS:** The data subjects can exercising their rights granted by the Regulation. The rights are the following: • Right to access: right to obtain from GVS a confirmation as to whether or not personal information is being processed, and, if so, to demand to gain access to personal data. • Right to rectification: right to obtain from GVS the rectification of personal data that may be considered inaccurate and to have incomplete information being completed, including by means of providing a supplementary statement. • Right to erasure: right to obtain from GVS the erasure of personal data without undue delay, where the request is made in accordance with the applicable laws and regulations. • Right to object to data processing: right to object at any time to the processing of its own personal data, unless it is based on the legitimate interest of GVS. • Right to limit the data processing: right to obtain from GVS a limitation on the processing activities when the accuracy and the precision of personal data is disputed, and for the time necessary for GVS to verify the accuracy of personal data. • Right to data portability: right to receive the personal data provided to GVS in a structured, commonly used and machine-readable format. There is also the right to transmit that data to another data controller without hindrance from GVS. • Right to make a complaint: without prejudice to any other administrative or judicial dispute, if it is believed that the data processing has been carried out illicitly or not compliant with applicable laws and regulations, there is the right to raise a complaint with the Supervisory Authority of the State of residence or work, or of the State where any breach has occurred. The data subjects can exercise these rights (and all the other provided by Regulation) by e-mail request sent to [privacy@gvs.it](mailto:privacy@gvs.it) or registered letter, attested by an acknowledgment of receipt, to GVS PRIVACY c/o GVS S.p.a., Via Roma 50, Zola Predosa (BO) Italy. In case of no answer, the data subjects have the right to lodge a complaint with a supervisory authority (art. 13, par. 2, lett. d).

**10. AUTOMATED DECISION-MAKING:** GVS does not adopt automated decision making.

For every doubt or further information, write to [privacy@gvs.it](mailto:privacy@gvs.it) .

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