

**Privacy Notice**  
**pursuant to the General Data Protection Regulation**  
**(EU Regulation n. 679/2016)**

--- for *whistleblowing* reports in accordance with legislative decree 24/2023 ---

Pursuant to Art. 13 of the General Data Protection Regulation (GDPR), you are hereby informed about the processing of your personal data by Silbernagl Srl/SiMobil Srl, depending on the reporting channel you use, and your rights.

Silbernagl Srl/SiMobil Srl guarantee that in processing your data your rights and fundamental freedoms, in particular your right to personal data safety, will be protected, not dependent on your nationality and your place of residence.

**Data controller**

The data controller responsible for the processing is

Silbernagl Srl/SiMobil Srl

Via Sciliar 39/1

39040 Castelrotto (BZ)

T +39 0471 706633

F +39 0471 707400

**Categories of processed data**

When you file a whistleblowing report and share your personal data with the person entrusted with managing the internal reporting channel, we will process the following data:

- your personal details, for example your name, your address, date and place of birth;
- other personal data.

**The way we process your data**

Your data is processed with or without the help of automatic processes and includes all the necessary ways necessary for the adequate processing, such as the collection, the registration, the organization, the structuration, the storage, the adaptation or the modification, the extraction, the consultation, the use, the communication by transmission, disclosure or any other form of making available, the comparison or interconnection, the restriction, the deletion or the destruction.

**The purpose and the legal basis of the data processing**

Silbernagl Srl/SiMobil Srl process your personal data only for the purpose of handling and managing the whistleblowing report you filed. The legal basis of the data processing is your consent to the data processing for the purpose specified above.

**The disclosure of personal data**

For the abovementioned purposes, the personal data will be disclosed to the following parties:

- to the public administration and public authorities, if required to do so by law;
- to service providers, professionals, advisors and other organizations that support us in carrying out our activities.

In the event that the abovementioned parties are charged with the processing of your data by Silbernagl Srl/SiMobil Srl, the data processors will be obliged to adopt all adequate guarantees for the protection of your personal data.

**The storage of data**

We store your personal data only for the time necessary to treat the report you filed and/or to comply with the legal obligations on data storage. In any case, your data will

not be stored for longer than five years from the moment you receive notice of the final finding regarding the report you filed. Thereafter, your personal data will be erased in a secure manner.

### **Rights of the data subject**

You enjoy the following rights:

- pursuant to Art. 15 GDPR, the right to access your personal data and the respective information. In particular, you enjoy the right to obtain information on the purposes of the processing, on the categories of the processed data, on the categories of parties to which your personal data has been or will be disclosed, on the storage period, on the existence of the right to rectification, erasure, restriction or objection to processing, on the existence of the right to lodge a complaint, on the origins of your data in case your data is not being collected by us, as well as on the existence of automated decision making, comprising profiling, and on the right to obtain significant information on the used algorithm;
- pursuant to Art. 16 GDPR, the right to have your personal data rectified or, when incomplete, integrated without undue or excessive delay;
- pursuant to Art. 17 GDPR, the right to erasure of your personal data that is being stored by us, save for the case in which the processing is necessary for exercising the right to freedom of expression or information, for the compliance with legal obligations, for purposes of public interest or for the ascertainment, the exercise or the defense of a right in court;
- pursuant to Art. 18 GDPR, the right to have the processing restricted if you contest the accuracy of your data, if the processing of the data is illegal and you object to its erasure, if we do not need the data anymore for the purposes of processing and you need the data for the ascertainment, the exercise or the defense of a right in court, or if you object to the processing pursuant to Art. 21 GDPR;
- pursuant to Art. 20 GDPR, the right to obtain your personal data in a format that is structured, of common use and machine-readable, and to request the transmission of that data to another data controller;
- pursuant to Art. 7, Par. 3 GDPR, to withdraw your consent at any moment; as a consequence, we can no longer process your data;
- pursuant to Art. 77 GDPR, to lodge a complaint to a supervising authority, in specific the authority of the place of residence or work, or of the data controller's place or residence.

In order to exercise said rights, please refer in writing to our offices or by sending an e-mail to [info@silbernagl.it](mailto:info@silbernagl.it).