

## **WHISTLEBLOWING POLICY**

**ICAP LEATHER CHEM spa (hereinafter, the "Data Controller")** provides you with the policy pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter, "GDPR"), Italian Legislative Decree 196/2003 and Italian Legislative Decree 101/2018, in relation to the processing of personal data, in compliance with the principles of lawfulness, correctness, transparency and minimisation of data, concerning the procedure for reporting hypothetical illegal conduct (also pursuant to Article 54 bis, Italian Legislative Decree 165/2001), transmitted through the dedicated section on the institutional website or the further methods provided and communicated on the site.

### **DATA CONTROLLER**

The Data Controller is ICAP LEATHER CHEM spa.

### **PURPOSES AND LEGAL BASIS OF DATA PROCESSING**

Your personal data will be processed for the management of all phases of the whistleblowing procedure, by way of example: collection of the report through the digital channel prepared on the institutional website or the other methods provided and communicated, verification of the validity of the alleged illegal conduct subject to the report, investigations, investigative activities, adoption of consequential measures, initiatives involving the judicial authority, and protection of rights. The legal basis of the processing is the Data Controller's legitimate interest, as well as the fulfilment of a legal obligation.

### **AUTHORISED PERSONS AND DATA PROCESSORS WHO WILL RECEIVE YOUR DATA**

Your personal data will be processed by the staff of ICAP LEATHER CHEM spa and by the PTBM law firm in ABBIATEGRASSO (MI), which has a role in managing the whistleblowing procedure, who are previously authorised for processing and specially instructed and trained (by way of example: staff, external consultants involved in management). All parties are strictly bound by the obligation not to disclose or divulge the personal data of which they become aware. The processing shall be carried out using almost exclusively computerised methods, but there is the residual and minimum need to process the data also in paper form for any reports received as an alternative to the digital channel prepared and dedicated on the institutional website. The data may also be processed by external parties, possibly also as independent Data Controllers, or formally appointed by the Data Controller as Data Processors pursuant to Article 28 of the GDPR, by way of example: the suppliers of the platform for the management of whistleblowing (for technical management purposes), other parties receiving your data could be the judicial authority, the Court of Auditors, the ANAC, as well as all parties in compliance with a legal obligation.

### **DATA RETENTION PERIOD**

The personal data shall be kept by the company until the purposes and the related legal obligations have been completed. Reports of facts not subject to the whistleblowing procedure shall be kept for the time required by law. For cases of reports that should be verified and not filed, as they are well-founded, the period of storage is identified as 10 years from the end of the corrective actions envisaged, as well as the time necessary for the management of all related activities. There is always a longer storage time if it is necessary to comply with a legal obligation or to experience the protection of a right in court.

### **DATA TRANSFER TO NON-EUROPEAN COUNTRIES**

The company does not transfer your data to countries outside the European Economic Area.

### **RIGHTS OF DATA SUBJECTS**

As a data subject, you are entitled to the rights pursuant to Articles 15/22 of the GDPR; for their exercise, you may contact the Data Controller or the DPO at the addresses indicated above. There is always the right to file a formal complaint with the Italian Data Protection Authority on the website: [www.garanteprivacy.it](http://www.garanteprivacy.it).

To make a REPORT, type the following address:

**<https://wb-hs.mc3-innovation.it/ARXivarNextWebPortal>**

Log in, the first time using an ID and PASSWORD: **segnalatore\_icapleather**

During the compilation of the REPORT, the system will provide you with a new ID and PASSWORD, which must be used for subsequent logins, in order to verify any requests from the REPORT MANAGER.