



DAL 1926

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**PROCEDURE FOR REPORTING BREACHES**  
***(WHISTLEBLOWING)***

**SPUMANTI VALDO S.r.l.**



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## 1. PURPOSES

The purpose of this document is to regulate the methods reporting any breaches of national or European Union regulations that damage the integrity of SPUMANTI VALDO S.r.l. (hereinafter also referred to as “the Company”) by anyone who becomes aware of them during their employment, collaboration or professional relationship with the Company or, in any case, in the context of their job as defined below.

In particular, this document illustrates: the channels, procedures and prerequisites for submitting internal or external reports, and the operational indications to be observed by the whistle-blower when submitting them; the protections reserved for the whistle-blower, and the responsibilities that he/she may incur for reports that turn out to be false or unfounded; the measures envisaged to protect the whistle-blowers and other persons involved in the report in various capacities.

This document is drawn up in compliance with the provisions of Legislative Decree No. 24 of 10 March 2023, implementing Directive (EU) 2019/1937 (hereinafter also referred to as the “Decree”) and concerning the protection of people who report breaches of Union law and national regulatory provisions.

## 2. DEFINITIONS

The terms indicated in this document with a capital letter shall have the meaning indicated below:

**Report Manager:** the person, internal or external, formally appointed by the Company to manage the reporting channel.

**Employment context:** the employment or collaboration relationship between the Whistle-blower and the Company, present or past, during which, regardless of the activity performed, the person acquires Information about Breaches and for which he/she could suffer retaliation in the event of a Report, Public Disclosure or complaint to the competent authorities.

**Public Disclosure:** any conduct likely to bring Breach Information into the public domain by print, electronic or other means of disclosure reaching a large number of people.

**Facilitator:** the natural person who assists the Whistle-blower in the Reporting process, operating in the same Work Context and whose assistance must be kept confidential.

**Information on Breaches:** information, including well-founded suspicions, concerning Breaches committed or which, on the basis of concrete elements, could be committed in the Company organisation, and elements concerning conduct to conceal those Breaches.

**Person Involved and/or Mentioned:** the natural or legal person mentioned in the Report, whether internal or external, or in the Public Disclosure to whom the Whistle-blower attributes commission of the Breach subject of the Report or the Public Disclosure or who is otherwise implicated in that Breach.

**Whistle-blower:** the natural person who submits the Report or Public Disclosure of Violation Information acquired in his/her Work Context. In particular, persons belonging to one of the following categories are entitled to submit Reports:

- fixed-term or open-ended, part-time or full-time employees;
- workers with an intermittent work contract or job on call;
- employees of employment agencies or temporary employees;
- apprentices;
- occasional workers pursuant to Art. 54-bis of L.D. 50/2017;
- self-employed workers, collaborators, consultants, workers with collaboration organised by the customer;
- collaborations referred to in Article 409 of the Italian Civil Proceedings Code, i.e., agency, commercial representation and other collaboration resulting in the performance of continuous, coordinated work, mainly of a personal nature, even if not subordinate;
- workers or collaborators working for public or private sector entities that provide goods or services or perform work for third parties;
- freelancers or consultants;
- volunteers or trainees, paid or unpaid;
- shareholders;
- persons with administration, management, control, supervision or representation functions, and also where those functions are exercised on a de facto basis;
- a Whistle-blower is any of the persons listed above even when the Breach Information is learnt about during the selection process or in other pre-contractual stages and/or in the course of the relationship, and even if
  - the legal relationship has not yet begun;
  - during the trial period;
  - after termination of the legal relationship.

**Acknowledgement:** communication to the Whistle-blower of information on the follow-up given or intended to be given to the Report.

**Retaliation:** any conduct, act or omission, even if only attempted or threatened, engaged in because of the Whistle-blowing, Public Disclosure or reporting of the Breach to authorities and which causes or may cause, directly or indirectly, unjust damage to the Whistle-blower (or to the person who submitted the report or a public disclosure) and/or to the other persons specifically identified by the provision.

**Report:** the communication of Breach Information, written or oral, made through the channels described below.

**Internal Report:** the communication, written or oral, of Breach Information, submitted through the in-house reporting channel referred to in paragraph 5 below.

**External report:** the communication, written or oral, of Information on Breaches, submitted through the external reporting channel set up by ANAC, referred to in paragraph 6 below.

**Follow-up:** the action taken by the Report Manager to assess the existence of the facts reported, the outcome of the investigation and any measures taken.

**Breach:** any conduct, act or omission that harms Company integrity and, in particular:

1. offences falling within the scope of European Union or national laws relating to the following areas:
  - public procurement;
  - financial services, products and markets and the prevention of money laundering and financing of terrorism;
  - safety and conformity of products;
  - transport security;
  - environmental protection;
  - radiation protection and nuclear safety;
  - food and feed safety and animal health and welfare;
  - public health;
  - consumer protection;
  - protection of privacy and protection of personal data and security of networks and information systems;
2. acts or omissions affecting the financial interests of the Union as referred to in Article 325 of the Treaty on the functioning of the European Union specified in the relevant secondary law of the European Union;
3. acts or omissions relating to the internal market, pursuant to Article 26(2) of the Treaty on the functioning of the European Union, including breaches of EU competition and State aid rules, and breaches concerning the internal market related to deeds in breach of corporate tax rules or mechanisms where the purpose is to obtain a tax advantage that nullifies the object or purpose of the applicable corporate tax law;
4. acts or conduct that nullify the object or purpose of the provisions in Union acts in the areas indicated in (1), (2) and (3).

### **3. REPORTS WITH CONTENT EXCLUDED FROM APPLICATION OF THE DISCIPLINE**

This document does not apply to reports concerning disputes, claims or requests linked to a personal interest of the Whistle-blower that relate solely to his/her individual work relations, or inherent to his/her work relations with hierarchically superior figures. Therefore, excluding reports concerning labour disputes, discrimination between colleagues, interpersonal conflicts between the Whistle-blower and another worker or with hierarchical superiors, reports concerning data processing carried out in the context of the individual employment relationship with no harm to Company integrity.

The following are also excluded:

- reports of breaches regulated in European Union directives and regulations and in the implementing provisions of the Italian legal system that already guarantee specific reporting procedures;
- national security breaches, and procurement relating to defence or national security issues, unless they are covered by relevant secondary EU law.

#### 4. REPORT CONTENT

It is very important to consider the following aspects related to the Report content:

- A. The Report must contain **detailed** Information on the Breaches based on **precise, concordant facts**.
- B. Reports may concern both Breaches committed and those not yet committed that the Whistle-blower reasonably believes could be committed on the basis of concrete elements. Elements concerning conduct to conceal Breaches may also be reported.
- C. Information on reportable Breaches **does not** include information that is **manifestly unfounded, information** that is already fully in the **public domain**, and information acquired only on the basis of indiscretions or rumours that are not very reliable (so-called **rumours**).

#### 5. INTERNAL REPORT

- A. The Company has set up a special In-house Reporting channel, which guarantees the confidentiality of the identity of the Whistle-blower, the Facilitator, the Person Involved, the other people mentioned in the Report, the content of the Report itself and related documentation.
- B. Consequently, the Company has identified a Report Manager assigned the specific tasks required by the report management regulations, in the person of the Quality Systems Manager.
- C. If the Report Manager has a conflict of interest, e.g. as a Person Involved and/or Mentioned or a Whistle-blower, one of the conditions for access to the External Reporting Channels to ANAC (mentioned in paragraph 6) applies, if the Report Manager considers that it cannot ensure that the Report be effectively followed up on.
- D. It should be noted that if the Internal Report is submitted to a person other than the Report Manager and outside the reporting channel implemented by the Company, it is only in cases where the Whistle-blower expressly declares that he/she wishes to benefit from the protections provided for by this procedure or that wish can be inferred from the Report, that the Report will be considered as such and will be forwarded, within seven days of receipt, to the Report Manager, with simultaneous notification of transmission to the Whistle-blower. Otherwise, that report is considered an ordinary report.
- E. The Internal Report must contain, inter alia, the following elements:
  - the time and place circumstances in which the event reported occurred;

- description of the fact;
- personal details or other elements enabling identification of the person to whom the facts reported can be attributed.

It is also useful to attach documents that could provide proof of the facts being reported, and an indication of other people potentially aware of the facts.

- F. The in-house reporting channel allows for Reports to be **anonymous**. As mentioned in paragraph 4 above, Reports should contain sufficient elements to identify the fact reported and enable the Report Manager to take any necessary action to ensure efficient, timely management of Reports (e.g. in the context of a disciplinary procedure initiated against the alleged perpetrator of the conduct reported). It should be noted that anonymous reports may restrict the possibility of carrying out some of the above-mentioned investigations or prosecution of the conduct reported.
- G. The Whistle-blower who wishes to submit a Report of which he/she has become aware in his/her Work Context may do so in the following ways:
- a) through a dedicated platform at the link <https://valdo.segnalazioni.net> where the Whistle-blower must 1) indicate all the information requested, as referred to in point E of this paragraph 2) read the Privacy Policy and 3) describe the fact by specifying the details in a special section of the platform or by voice message;
- or
- b) request a meeting with the Report Manager to be agreed with the Whistle-blower in a place that ensures confidentiality. With the consent of the Whistle-blower, the meeting will be recorded on a suitable storage and listening system. If the Whistle-blower does not consent, his/her statements will be recorded in writing. In that case, the Whistle-blower may check and correct the meeting minutes and, on doing so, confirm them by signing them.
- H. The facts indicated in the Report received will be analysed and verified by the Report Manager, who:
1. will take all necessary measures to ensure the confidentiality of the Whistle-blower, the Facilitator, the Person Involved, other people mentioned in the Report, the content of the Report itself and related documentation;
  2. will issue the Whistle-blower with an acknowledgement of receipt for the Report within seven days from the receipt date;
  3. in the event of a request for a meeting, schedule the meeting within a reasonable time after receiving the Report;
  4. will take steps to verify the subject matter, truthfulness and seriousness of the Report received, also by asking the Whistle-blower for further additions in writing; these will in turn be recorded or minuted in writing;
  5. where what is reported is not suitably detailed, the Report Manager may request additional information from the Whistle-blower through the dedicated channel, or even in person, if the latter has requested a direct meeting;



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6. may interface with other corporate functions and figures to request their cooperation for better investigation and analysis of the Report; in full compliance with the confidentiality guarantees set out in the Decree and in this procedure;
7. may carry out investigations involving external consultants, in absolute compliance with the guarantees of confidentiality set out in the Decree and in this procedure;
8. within 3 months from the date of the acknowledgement of receipt mentioned in paragraph 2., inform the Whistle-blower of the Follow-up that has been given or will be given to the Report.
9. The activities performed are documented. Documents are filed guaranteeing adoption of measures to protect confidentiality in accordance with Decree and procedure principles and in compliance with the retention periods indicated (paragraph 8 below).

## **5.1. REPORT INADMISSIBILITY**

- A. If the Whistle-blower is not one of the persons who can submit Reports, or if the facts reported are not Breaches, in accordance with Decree provisions, the Whistle-blower will be informed within the time limits laid down by the legislation that the Report cannot be followed up on for those reasons. In this case, the Whistle-blower may be guided in submitting the Report through the ordinary channels made available by the Company (e.g. e-mail, telephone numbers, etc.) but will not enjoy the specific protections envisaged by Legislative Decree 24/2023, mentioned in paragraph 7 below.
- B. The Report is considered inadmissible, even if it complies with the subjective and objective requirements set out in the preceding paragraphs and is filed by the Report Manager, for the following reasons:
- a) manifestly unfounded due to no factual elements attributable to the typified breaches: by way of example, reports characterised by predominantly personal matters of the Whistle-blower to obtain an assessment of the merits of its own subjective affairs, and reports of breaches that cannot be qualified as unlawful and therefore not supported by any grounds related to the rule allegedly breached;
  - b) ascertained generic content of the Report for an offence that does not enable comprehension of the facts, or a Report of offences accompanied by inappropriate or irrelevant documentation that does not enable understanding of the Report content ;
  - c) production of documentation alone with no Report of misconduct.

## **6. EXTERNAL REPORTING AND PUBLIC DISCLOSURE**

The Whistle-blower may also submit a Report through the channel set up by ANAC (the so-called "External Report") **only** if, when the Report is submitted, one of the following conditions is met:

- a) the Whistle-blower has already submitted an Internal Report as described in paragraph 5 above and the Report has not been followed up on;





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- b) the Whistle-blower has reasonable grounds to believe that, if he/she were to submit an Internal Report, the Report would not be effectively followed up on, or that the Report might lead to a risk of Retaliation;
- c) the Whistle-blower has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest.

Without at least one of the above conditions, the Whistle-blower will not be able to activate the External Reporting channel.

Like the In-house Reporting channel, the External Reporting one activated by ANAC also guarantees the confidentiality of the identity of the Whistle-blower, the Facilitators, the Person Involved, the other people mentioned in the Report, the Report content and the related documentation. The same confidentiality is guaranteed when the Report is received by persons other than those in charge of processing Reports, to whom it is in any case transmitted without delay.

External Reports can be submitted through the channels specifically set up by ANAC:

- IT platform on the institutional ANAC website, by clicking the link to the dedicated page, you can access the service dedicated to 'whistle-blowing' (<https://www.anticorruzione.it/-/whistleblowing>).
- Oral reports.
- Face-to-face meetings set within a reasonable period of time.

The Whistle-blower may also submit a Public Disclosure under even stricter conditions than those set out related to External Reporting<sup>1</sup>, without prejudice to the possibility of submitting complaints to the judicial authorities.

## **7. PROTECTION AND SUPPORT MEASURES**

The protection system provided for by the Decree consists of the following of protection types:

1. protection of the confidentiality of the Whistle-blower, the Facilitator, the Person Involved and the people mentioned in the Report (paragraph 7.1 below);
2. protection against any retaliatory measures taken by the entity due to the Report, public disclosure or whistle-blowing submitted and the conditions for its application( (paragraph 7.4 below);

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<sup>1</sup> Whistle-blowers may submit a **Public Disclosure** directly when:

- the Whistle-blower has previously submitted an Internal and External Report or has made an External Report directly and no reply has been received within the established time limits on the measures envisaged or taken to follow up on the reports;
- the Whistle-blower has reasonable grounds to believe that the breach may constitute an imminent or obvious risk to the public interest;
- the Whistle-blower has well-founded grounds to believe that the external report may entail the risk of retaliation or may not be effectively followed up on due to the specific circumstances of the case; such as where evidence may be concealed or destroyed or where there is a well-founded fear that the Whistle-blower may be colluding with the breach author or be involved in the breach.

3. limits to liability with respect to the disclosure and dissemination of certain categories of information operating under certain conditions;
4. provision of support measures by Third Sector entities included in a special list published by ANAC (paragraph 7 below).

#### **7.1 PROTECTION OF CONFIDENTIALITY**

The Company guarantees the confidentiality of the identity of the Whistle-blower, the Facilitator, the Person Involved and those mentioned in the Report, and the confidentiality of the Report content and of the documents attached to it.

Reports may not be used beyond what is needed to adequately follow up on them.

Reports received in compliance with the preceding paragraphs of this procedure will only be collected and processed by the Report Manager.

Furthermore, the identity of the Whistle-blower:

- within the framework of the disciplinary proceedings, cannot be disclosed, if the dispute of the relevant charge is based on investigations that are separate and additional to the Report, even if resulting from it. If the charge is fully or partially based on the Report, and knowing the identity of the Whistle-blower is indispensable for the accused person's defence, the Report will be usable disciplinary for proceedings purposes only if the Whistle-blower gives his/her express consent to disclosure of his/her identity. In that case, the Whistle-blower must be informed in writing of why the confidential data is disclosed, and be asked in writing whether he/she intends to consent to revealing his/her identity, with a warning that - if not - the Whistle-blowing Report may not be used in the disciplinary proceedings.

The prohibition to disclose the Whistle-blower identity refers not only to the name but also to any other information or element in the report, including the documentation attached to it, when its disclosure could lead to the identity of the Whistle-blower being directly or indirectly deduced.

The confidentiality of the Facilitator, of the Person Involved and/or Mentioned in the report shall be guaranteed until conclusion of the proceedings initiated because of the report and in compliance with the same guarantees provided to the Whistle-blower, except where the reports are submitted to the judicial authorities.

#### **7.2 SUBJECTS PROTECTED FROM RETALIATION**

Protection against retaliation, in addition to the Whistle-blowers as defined in paragraph 2. is also extended to:

- Facilitators;
- persons in the same Work Context as the whistle-blower and who are linked to him/her by a stable emotional or family relationship up to the fourth degree;



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- the whistle-blower's colleagues who work in the same context as him/her and who have a regular and current relationship with that person;
- entities owned by or for which the Whistle-blower works, and entities operating in the same work environment as the latter;
- in the case of an Anonymous Report, if the Whistle-blower is then identified.

### **7.3 PROHIBITION TO RETALIATE**

If the conditions set out in the preceding paragraphs are met, the Company shall ensure that the persons referred to in paragraph 7.2 are protected from any form of Retaliation.

The following constitute retaliation:

- a) dismissal, suspension or equivalent measures;
- b) relegation in grade or non-promotion;
- c) change of duties, change of workplace, reduction in salary, change of working hours;
- d) suspension of training or any restriction of access to it;
- e) negative merit notes or negative references;
- f) the adoption of disciplinary measures or other sanctions, including fines;
- g) coercion, intimidation, harassment or ostracism;
- h) discrimination or otherwise unfavourable treatment;
- i) the failure to convert a fixed-term employment contract into a permanent contract, where the employee could legitimately expect that conversion;
- j) non-renewal or early termination of a fixed-term employment contract;
- k) damage, including to a person's reputation, particularly on social media, or economic or financial harm, including loss of economic opportunities and loss of income;
- l) inclusion in improper lists on the basis of a formal or informal sectoral or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future;
- m) early termination or cancellation of the contract for the supply of goods or services;
- n) cancellation of a licence or permit;
- o) the request to undergo psychiatric or medical examinations.

Alleged retaliation, even if only attempted or threatened, must be reported to ANAC (<https://www.anticorruzione.it/-/whistleblowing>) which is entrusted with ascertaining whether it is the result of the report, denunciation or public disclosure submitted.

Any retaliatory or discriminatory actions against the Whistle-blower will be prosecuted by the Company and may expose the person who performed them to disciplinary sanctions, on the basis of provisions in the law and the relevant company regulations.

#### **7.4 PREREQUISITES FOR PROTECTION AGAINST RETALIATION**

The prerequisites for persons referred to in paragraph 7.2 to receive statutory protection are as follows:

- the person reported on the basis of a reasonable belief that the Breach Information reported is true and within the objective scope of Legislative Decree 24/2023;
- the Report was submitted pursuant to Legislative Decree 24/2023 and this procedure;
- there is a consequential relationship between the Report submitted and the retaliatory measures taken.

Mere suspicions or rumours are not enough. Neither the certainty of the facts nor the personal motives that led the person to report, denounce or submit the public disclosure are relevant.

Without those conditions, Whistle-blowing does not fall within the scope of this procedure, so the protection envisaged does not apply to Whistle-blowers; similarly, the protection granted to other persons who, by reason of the role they play in the reporting process and/or of the particular relationship that binds them to the Whistle-blower, are indirectly subject to Retaliation, is excluded.

#### **7.5 SUPPORT MEASURES BY THIRD SECTOR ENTITIES**

A list of the Third Sector entities providing Support Measures to Whistle-blowers, consisting of information, assistance and advice free of charge on how to Report and on the protection from retaliation offered by national and European Union laws, on the rights of the Person Involved, and on the terms and conditions of access to legal aid, is established at ANAC.

### **8. PROCESSING OF PERSONAL DATA**

The Company is the controller of the personal data processed in the context of the Whistle-blowing Reports referred to in this procedure.

Prior to submission of the Report, the Whistle-blower, the Person Involved and/or Mentioned and the Facilitators will receive information pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR"). In particular, this disclosure (**Annex 1** of this document) will be:

- generated automatically in the case of an Internal Report made through the Platform, which can be accessed via links from the website;
- posted on the company notice board;
- delivered by the Report Manager for a Report submitted during the meeting specifically requested by the Whistle-blower.

The Reports received by the Company, together with deeds and documents attached, will be kept for as long as needed to manage them and, in any case, as envisaged by legislation, for a period not exceeding five years from the date of the communications of their final outcome.

According to the provisions of Art.2-undecies Legislative Decree 196/2003 the Person Involved and/or Mentioned in the Report, with reference to his/her personal data processed in the Report context, cannot exercise the rights that the GDPR normally grants to data subjects (the right to access personal data, the right to rectify them, the right to obtain erasure or so-called right to be forgotten, the right to restrict processing, the right to data portability and the right to object to processing). This is because exercising those rights could result in actual and effective prejudice to the protection of the Whistle-blower identity confidentiality.

In those cases, the Person Involved and/or Mentioned as data subject may exercise the aforementioned rights by addressing the Data Protection Authority, in the manner provided for in Art. 160 of Legislative Decree 196/2003. In that case, the Data Protection Supervisor will inform the data subject that all the necessary controls or a review have been carried out, and of the data subject's right to appeal.

#### **9. RESPONSIBILITIES OF THE WHISTLE-BLOWER**

Without prejudice to the specific liability limits envisaged by the legislator, the protection provided in a retaliation situation does not apply if a criminal liability judgement is ascertained, even if not final, of first instance against the Whistle-blower for the offences of slander or defamation or in any case for the same offences related to the report, or civil liability for having reported false information intentionally with malice or negligence.

In cases where the aforementioned responsibilities are established, a disciplinary sanction will also be imposed on the Whistle-blower on the basis of the law and the relevant company regulations.

Any abuse of this procedure, such as Reports that are manifestly unfounded and/or made for the sole purpose of harming the person reported or other persons, and any other hypothesis of improper use or intentional exploitation of the procedure itself, shall give rise to liability in disciplinary proceedings and, where applicable, in other competent fora.

#### **10. CONSEQUENCES OF THE REPORT FOR THE PERSON INVOLVED**

If it considers the Report to be well-founded, without prejudice to any other legal remedy and right, the Company may initiate disciplinary proceedings against the Person Involved, pursuant to the CCNL (labour contract) applicable and the relevant company regulations.

In addition, the Company may communicate the facts subject of the Report to the competent authorities, filing complaints, lawsuits and so on.

#### **11. EFFECTIVE DATE AND PUBLICITY**

This document shall enter into force on 01/02/2024.

In order to ensure that the channel, procedures and prerequisites for submitting Reports are known, this document is displayed, in hard copy, on the company notice board and is published, in electronic format, on the Company website.

**ANNEX 1 - INFORMATION ON THE PROCESSING OF PERSONAL DATA OF PERSONS WHO REPORT BREACHES OF EU OR NATIONAL LAW, PERSONS INVOLVED, PERSONS MENTIONED AND FACILITATORS**

SPUMANTI VALDO S.r.l., as data controller of personal data (hereinafter "SPUMANTI VALDO"), issues this information notice to the Whistle-blower, to the Persons Involved or mentioned and to the Facilitators in compliance with European and Italian regulations on the protection of personal data.

**LEGAL BASIS AND PURPOSE OF PROCESSING.**

SPUMANTI VALDO processes personal data to carry out the investigations needed to verify the validity of the fact reported and adopting the consequent measures.

Consent is not required because processing is needed to fulfil regulatory obligations incumbent on SPUMANTI VALDO in accordance with the provisions of Legislative Decree no. 24 of 10 March 2023

**DATA CATEGORIES AND THEIR SOURCES.**

SPUMANTI VALDO processes data of a common nature (name, surname, qualification, etc.), data of a particular nature (data relating to health, trade union membership, etc.) and/or data relating to criminal convictions, offences and security measures. This information may be collected directly from the person to whom it relates (hereinafter the "Data Subject") and/or from third parties (e.g. when the Whistle-blower provides information on the person involved and/or on other persons mentioned and/or on the facilitator, or when further information/documents are acquired from other SPUMANTI VALDO structures during the investigation).

**RETENTION PERIOD FOR DATA COLLECTED**

The data collected are retained for the time needed to process the report and for the period needed to complete the related administrative procedure or any legal proceedings initiated; in any case no longer than 5 years from the date of communication of the final outcome of the reporting procedure.

**NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSAL TO PROVIDE DATA.**

Provision of personal data is optional, but needed to handle reports and related activities, with the consequence that any refusal to provide that data prevents us from doing so.

**CATEGORIES OF RECIPIENTS.**

In the report management stage, personal data may be processed by internal figures specifically authorised for the purposes indicated, and service providers or other external parties (e.g. managers of platforms used to manage reports), who will process the data as data processors on behalf of SPUMANTI VALDO.

Where applicable, personal data may be passed on to third parties to whom disclosure is required by law (e.g. judicial authorities, national anti-corruption authorities, etc.).

Under no circumstances will personal data be disseminated.

**TRANSFER OF DATA TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANISATION**

Personal data will not be transferred to any third countries outside Europe or to international organisations.



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## **RIGHTS OF DATA SUBJECTS.**

Data Subjects have the right to obtain access to their personal data, to have them updated (or corrected, if inaccurate), to have them deleted or to restrict the processing of their personal data, subject to the respective conditions and in particular within the limits of the provisions of Article 2-*undecies* of Legislative Decree no. 196/2003.

To exercise your rights, you may use the form available at <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and forward it to the subject in charge of handling the report, contacting him/her through the channel used for the report, i.e. SPUMANTI VALDO, with registered office in Via Foro Boario, 20, 31049 Valdobbiadene (TV). The Data Subject also has the right to lodge a complaint with the competent Privacy Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)).