

# NOTICE ON THE PROCESSING OF PERSONAL DATA IN “WHISTLEBLOWING” REPORTS

## **IN COMPLIANCE WITH EU REGULATION 2016/679 (GDPR) AND LEGISLATIVE DECREE 196/2003**

### **1. Data Controller**

The Data Controller is Match S.r.l. with registered office at Via Griffi 6 – 21100 VARESE-C.S. € 21,000 REA 294428 Company Reg. and VAT number 02844730123 (hereinafter also referred to as “The Data Controller”).

### **2. Categories of personal data subject to processing**

As part of the process of managing reports of violations, pursuant to Legislative Decree 24/2023 (the so-called “Whistleblowing” Decree), the Data Controller may process the personal data of the persons filing the report, of the reported persons, of the persons cited or involved in the report, and in any case of the persons to whom the protections provided for by Legislative Decree 24/2023 apply, as detailed in the Whistleblowing Procedure published on the Data Controller’s website.

The processing in question involves the voluntary provision of personal data through the completion of a form following a specific web procedure or by meeting directly with the Whistleblowing Function identified by the Data Controller and indicated in the specific procedure “Whistleblowing reporting procedure”. The processing may therefore concern common personal data, such as personal information, contacts, and data relating to the interest party’s work activity and, within the limits of what is strictly necessary, personal data belonging to the special categories referred to in the art. 9 of EU General Data Protection Regulation 2016/679 (hereinafter: Regulation or GDPR), or those relating to health, trade union membership, data capable of revealing racial origin, political opinions, religious or philosophical beliefs of the interested party, or data relating to criminal convictions and crimes referred to in art. 20 of the GDPR.

### **3. Purpose and legal bases of the processing**

Personal data may be processed for the following purposes:

- Management of the report in all its phases, including that of ascertaining the facts being reported and implementing any consequent measure, as described in the Whistleblowing Reporting Procedure published on the Data Controller’s website;
- Compliance with legal obligations regarding whistleblowing resting on the Data Controller.

For the aforementioned purposes, the legal basis of the processing is the fulfillment of the legal obligation to which the Data Controller is subject, namely Legislative Decree 24/2023, and the application of procedures necessary to follow up on the provisions of the aforementioned decree, pursuant to arts. 6(1)(c), (2)(b), and 10 of the GDPR, as well as art. 88 of the same Regulation.

The legal basis of the processing operations indicated below is, instead, consent, pursuant to art. 6(1)(a) of the GDPR:

- The disclosure of the whistleblower’s identity, and any other information from which such identity can be directly or indirectly inferred, to persons other than those competent to receive or follow up on the reports, in the cases established by the applicable legislation;
- The disclosure of whistleblower’s identity in the disciplinary proceedings when the dispute is based, in whole or in part, on the report, and knowledge of the aforementioned identity is essential for the defense of the accused party.

In the aforementioned cases, it will be the responsibility of the Data Controller, or of the individuals appointed by the Data Controller for this purpose, to acquire the consent of the whistleblower through the specific form.

### **4. Data providing**

The provision of personal data is optional. Failure to provide data could, however, jeopardize the investigation of the report; indeed anonymous reports will be taken into consideration only if adequately detailed, in such a way as to reveal facts and situations connected to specific contexts, in compliance with what is specified in the Whistleblowing Procedure published on the Data Controller’s website.

### **5. Processing of personal data**

The processing will be carried out using a web platform equipped with encryption tools to ensure the confidentiality of the whistleblower’s identity and the content of the reports and related documentation, adopting technical and organizational measures suitable for protecting them from unauthorized or illegal

access, destruction, loss of integrity and confidentiality, even accidental. The processing of personal data may also take place with the support of paper media, with methods aimed at ensuring their security and confidentiality, in compliance with the provisions of Legislative Decree 24/2023.

#### **6. Recipients of personal data**

In addition to the figures specifically authorized by the Data Controller, such as the Supervisory Body pursuant to Legislative Decree 231/2001, personal data may also be processed by individuals who carry out activities on behalf of the Data Controller, in their capacity as Data Processors. Furthermore, in cases provided for by regulations, personal data may be communicated to the National Anti-Corruption Authority (ANAC), to the ordinary judicial authority, or to the judicial accounting authority.

#### **7. Transfer outside the EU**

At present, there is no provision for the transfer of personal data to countries outside the European Economic Area (EEA).

#### **8. Retention period for Personal Data**

Personal data will be retained for a maximum period of 5 years starting from the date of communication of the final outcome of the reporting procedure, and in any case, until the conclusion of proceedings initiated by the offices or bodies to which the report is addressed. In any case, personal data provided by the whistleblower that are not relevant to the processing of the report will be subject to immediate deletion.

#### **9. Rights of Data Subjects**

Whistleblowers have the right to obtain, in cases provided for by the Regulation, access to personal data, rectification, integration, deletion, or restriction of processing, or to object to the processing itself (Articles 15 and following of the GDPR). The request can be made by contacting the Whistleblowing manager through the web platform used for reporting. Data subjects who believe that the processing of their personal data violates the provisions of the Regulations also have the right to lodge a complaint with the Data Protection Authority, using the forms published at the following link: <https://www.garanteprivacy.it/i-miei-diritti>.

Furthermore, for processing activities that require it, you have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing carried out before the withdrawal of consent.