

PRIVACY POLICY UNDER ARTICLES 13 AND 14 EU REG. 2016/679 ("GDPR")

Introduction Under Articles 13 and 14 of EU Regulation no. 2016/679 ("GDPR"), Giusto Faravelli S.p.A., in its capacity as Data Controller, provides information to Data Subjects about the methods and purposes for processing their Personal Data, acquired through the submitted harassment complaints in paper or electronic format, as part of the Discrimination Reporting procedure.

The Data will be processed under legal obligations and principles, ensuring protection of Data Subject fundamental rights and freedoms.

This policy does not apply to any information provided anonymously and not associated or associable with an identified or identifiable person.

Data Controller Giusto Faravelli S.p.A., with its registered office in Milan (MI) Via Medardo Rosso 8, Tax Code and VAT number 03224410153, which can be contacted at:

- Tel. +39 02 697171
- Email faravelligroup@faravelli.it – privacy@faravelli.it

Categories of Data Processed and its Original Source Personal data:

- personal data, contact details, company to which data subjects belong, role, special or judicial data of the person submitting a Complaint as part of the Discrimination Reporting procedure adopted by the Data Controller, and any other personal data that the Complainant deems appropriate to disclose to substantiate their complaint;
- personal data, company, role, conduct and any other information relating to the reported person, which will be transmitted to the Data Controller as part of the Discrimination Reporting procedure.

Data processing purpose Personal data is processed:

- to collect and process discrimination or harassment complaints, and carry out investigations under Legislative Decree 81/2008 (Consolidated Law on protection and health and safety in the workplace), and Legislative Decree 11 April 2006, no. 198 (Equal Opportunities Code, under Article 6 of Law 28 November 2005 no. 246);
- to exercise disciplinary power against employees or exercise rights under the contract for acts committed in violation of the principles contained in the Policy against Discrimination;
- for any potential exercise of the Data Controller's right of defence.

Processing legal basis and data retention period	Purpose	Legal basis	Retention time
	i.	Processing is necessary: - to meet legal obligations, under Art. 6.1.c of REG. 2016/679;	Processing will not exceed the duration necessary for the purposes for which the data was collected, under the statute of limitations or different retention periods established by law, or longer retention period, if it is necessary to
	ii	- to meet contractual obligations, under Art. 6.1.b of REG. 2016/679;	
		- to pursue the Data Controller's legitimate interest to defend itself in	

	<p>iii court and guarantee communications with partners, customers, suppliers and Group Companies, after balancing the Data Subject's fundamental rights and freedoms, under Art. 6.1.f of REG. 2016/679.</p>	<p>protect the Data Controller's rights.</p>
<p>Data processing methods</p>	<p>Personal data processing will be based on principles of correctness, lawfulness and transparency, protecting Data Subject confidentiality and rights and will be carried out using physical or technological tools suitable to guarantee its security and confidentiality, following best practices.</p> <p>The Data stored at the Data Controller's registered office will not undergo automated decision-making processes, but exclusively by appointed, informed and trained personnel, and will be disclosed exclusively to authorised personnel to carry out complaint-related investigations.</p>	
<p>Failure to provide data</p>	<p>Providing data by the Data Subject is optional.</p> <p>If the Complainant submits the complaint using the platform in the specific section of the www.faravelligroup.com website, they can specify or omit their personal data (anonymous reporting).</p> <p>Refusal to provide personal data by the complainant, will not have any consequences.</p>	
<p>Categories of subjects who access data and dissemination</p>	<p>Data will be processed exclusively by the appointed personnel acting based on specific instructions that ensure Data protection and confidentiality. Data will be processed by the Trusted Adviser appointed by the Giusto Faravelli S.p.A. Board of Directors and Board members identified under the Discrimination Policy adopted by Giusto Faravelli S.p.A. and operating under an appointment deed conferred by the Data Controller.</p>	
<p>Data transfer</p>	<p>Data will not be transmitted abroad or to other bodies, unless requested by Authorities.</p>	
<p>Data subject rights</p>	<p>Data Subjects are entitled to exercise the rights under Art. 15 et seq. of the GDPR, particularly the right to:</p> <ul style="list-style-type: none"> - access, or obtain confirmation of the existence of their personal data, its origin, and the logic and purposes upon which processing is based, the recipients or categories of recipients to which the data may be disclosed, retention period's decision method, if it can be defined; - rectification of inaccurate data; - erasure (known as right to be forgotten), if the data is no longer necessary for processing purposes, or if the Data Subject has withdrawn consent to processing (if that consent is optional or there is no other legal basis for processing); - limitation, the right to obtain access restriction to their personal data by those who have a service or employment contract with the Data Controller. The Data Controller guarantees access to special and judicial Data (if provided for specific purposes) to a limited number of people to guarantee data security, integrity and correctness; - portability, the right to receive, in a structured, commonly used and machine-readable format, personal data, and the ability to send it to another Data Controller. This right does not apply to non-automated processing (for example, archives or paper records). Only data processed with your consent and provided by you personally will be subject to portability. - objection, i.e. the right to object to processing in specific situations; 	

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- complaint under Art. 77 GDPR to be sent to the Data Protection Authority, email: garante@gdpr.it.

Methods for exercising rights

Rights may be exercised through the Trusted Adviser by sending a registered letter with return receipt to Giusto Faravelli S.p.A., with its registered office in Milan, Via Medardo Rosso 8, and specify "Confidential for the Trusted Adviser."