

Moba Eurotubi Srl
Sede legale e amministrativa
Via Canneti, snc
22030 Montorfano (CO) Italia
Tel +39 031 200 295
info@gruppomoba.com

**PRIVACY NOTICE REGARDING THE REPORTING OF ILLEGAL ACTIVITIES PURSUANT TO
LEGISLATIVE DECREE NO. 231/01 AND LEGISLATIVE DECREE NO. 24/23
(WHISTLEBLOWING)**

PURSUANT TO ARTICLE 13 OF EU REGULATION 679/16

Dear Sir/Madam,

This is to inform you that the Data Controller, **MOBA EUROTUBI s.r.l.**, VAT No. **00341480945**, represented by its current legal representative (hereinafter also referred to simply as “Moba” or “the Company”), with its registered office at Via Canneti snc – 22030 Montorfano (CO)

Hereby informs you that the personal data being processed fall within the following categories:

Personal data of the whistleblower in the case of reports made non-anonymously via the dedicated platform:

- mandatory standard data: first name, surname.
- optional standard data: nature of relationship with the Company, job category, role, position, telephone number, email address.

Personal data relating to the person(s) reported and/or other individuals involved in the report: the data that may be processed is that which the reporter has chosen to provide in order to describe the facts set out in the report.

In this case, the Company is unable to determine in advance the specific data covered by the report, which may therefore also include sensitive data or data relating to criminal convictions and offences.

Methods of processing: personal data will be stored in paper documents and/or digital files and archives, and will be processed in accordance with the principles of lawfulness, relevance, transparency and fairness.

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Isernia Plant Zona Ind.le - 86097 Sessano del Molise (IS) Italia - Tel +39 0865 930 000

Dati Societari Moba Eurotubi Srl soggetta a direzione e coordinamento di DRS Srl
CF/RI 01836020139 - PI 00341480945 - REA n° CO-327589 - Cap. Soc. 4.450.000,00 € i.v.
PEC mobaeurotubi@postacertificata.com - SDI OP0ZOL9 - www.gruppomoba.com



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Lawfulness, relevance, transparency and fairness: the processing of personal data is carried out in accordance with the principles of necessity, lawfulness and fairness in relation to the data processed and collected, with data subjects being informed in advance and in an appropriate manner, and their consent being sought in advance unless the processing is justified on other lawful grounds.

Purpose and legal basis: the data will be processed for the purpose of carrying out the necessary investigations to verify the validity of the matter reported and to take any measures that may be required.

The legal bases for the processing are as follows:

- a) for ordinary personal data, Article 6(1)(c) and (e), namely the fulfilment of a legal obligation to which the data controller is subject; for special categories of data, Article 9(2)(b) and (g) of the GDPR;
- b) the express consent of the whistleblower, solely for the purpose of making the report available where this is necessary for the defence of the accused, including in disciplinary proceedings (Article 12(2) and (5) of Legislative Decree No 24/23).

Consequences: refusal to consent to the processing of data could result in the report not being taken into consideration.

Your rights as a data subject: in accordance with the legislation in force and within the limits thereof, you may exercise all the rights and powers provided for and governed by Chapter III, Articles 15–22 of EU Regulation 679/16 (GDPR) and, in particular, you are entitled to:

- i. to transparency regarding the methods of processing,
- ii. to receive specific information regarding your processed data,
- iii. to access your personal data held,
- iv. to the rectification or erasure of your data,
- v. to restrict the processing of your personal data,

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- vi. to receive “notifications” regarding the events referred to in the preceding points,
- vii. to the “portability” of personal data (where possible),
- viii. to object to the processing on specific and documented grounds,
- ix. to lodge a complaint with the Data Protection Authority and
- x. to be informed of any data breaches concerning you and of the right to withdraw consent at any time without affecting the lawfulness of processing based on consent given prior to withdrawal.

In accordance with Article 23 of the Regulation, we inform you that the aforementioned rights may not be exercised by certain data subjects involved in the report (those reported and/or other persons involved in the report), where the exercise of such rights could result in actual and concrete prejudice to the confidentiality of the whistleblower’s identity.

How to exercise your rights as a data subject: the rights granted by law to data subjects, and in particular the right to access, rectify and erase the personal data provided, as well as the right to object, must be exercised by sending an email to: dpo@gruppomoba.com – privacy@gruppomoba.com with the subject line “EXERCISE OF THE RIGHT TO ...”.

All rights granted by law may be exercised free of charge at any time by contacting the Data Protection Officer designated by the Data Controller, following submission of the relevant request in the manner described above. Responses to requests from Data Subjects will be **provided within 30 days** of receipt of the Data Subject’s duly submitted request, or **within a longer period of up to 90 days**, provided the Data Subject is notified in advance in the event that particularly complex operations are required to ensure a full response, or where there is another justified reason.

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The response will be provided electronically, and the data subject will receive a reply by email to the address provided when the request was made.

Recipients or categories to whom personal data may be disclosed: personal data will be accessible only to those within the Company who require it for the role or duties they perform in relation to the process of receiving, analysing, investigating and managing reports and any subsequent actions. These individuals are appropriately trained to prevent the loss of data, unauthorised access to data or unauthorised processing of the data and, more generally, in relation to obligations regarding the protection of personal data.

The data may also be processed by external consultants and third parties with technical functions, acting as data processors.

Finally, personal data may also be disclosed to other independent data controllers, in accordance with statutory or regulatory provisions (e.g. public authorities, judicial authorities, the Court of Auditors and ANAC).

Retention periods and disclosure of processed personal data: personal data will be processed for a period not exceeding the time required to achieve the purposes for which it is processed and, in any event, for no longer than 5 years from the notification of the final outcome of the procedure.

Contact details of the *Data Protection Officer*: Please be advised that you may exercise any of your rights as a data subject by contacting our designated *Data Protection Officer* at the following email address: dpo@gruppomoba.com – privacy@gruppomoba.com.

The Data Controller

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