



Privacy Policy Statement - Articles 13 and 14 of Regulation (EU) 2016/679 GDPR
Privacy Policy Statement on Whistleblowing

For the purposes of this Privacy Policy Statement any term in capital letters has the meaning specified in art. 4 Regulation (UE) 2016/679 GDPR and Legge 179/2017.

1. Data Controller

The Data Controller is GREEN OLEO S.P.A. with offices in Cremona, via Bergamo, 66, that can be contacted at this account: privacy@greenoleo.com

2. Personal Data

According to artt. 13 and 14 of Regulation (UE) 2016/679 GDPR and according to the Whistleblowing procedure contained in the D.Lgs 231/2001 MOG, the data processed by the Data Controller are linked to the reported events, including possible personal details, they will all be processed in order to verify the validity of the report and its handling. Data processing will be made through both digital and paper instruments that will comply with the requirements of confidentiality.

3. Purposes

Personal Data of the Data Subject will be processed only in respect of the Whistleblowing procedure and to comply with legal obligations derived by Italian law and EU regulations.

4. Legal basis

The legal basis of the processing of Personal Data connected to a Whistleblowing report is a legal obligation (lett c) art. 6 GDPR (art. 6 D.lgs. 231/2001 as amended by Legge n. 179/2017).

5. Consequences for not supplying Personal Data

The reporting agent has to accompany his/her report with his/her name and a refusal to do so will preclude the respect of the Whistleblowing procedure. Nonetheless, anonymous reports are allowed only in case the report is very well detailed so that it allows Data Controller to fully understand the reported facts and determine the possible liabilities.

6. Recipients

Recipients of the Personal Data are Green Oleo's Compliance Officers as Data Processor in the field of Whistleblowing; Compliance Officers will keep the name of the reporting agent confidential. In the process of verification of the soundness of the report, if it becomes necessary during the investigation, the name of the reporting agent can be communicated to the Data Controller and the functions involved in the case. In cases like this, Compliance Officers have to underline to anyone involved in the investigation, of its confidentiality. Personal Data could be transmitted to HR and/or to the accused only if the report agent assents or if the report is the only element to be used for the disciplinary procedure and the knowledge of the name of the reporting agent is necessary for the defence of the accused. Being the case, Personal Data can be communicated to third parties including by way of example:

- a) consultants (i.e. law offices, ecc.);
- b) IT outsourced services;
- c) public authorities, forces of law and order, prosecuting authorities, investigative agencies.

Your Personal Data will not be in any way disseminated.

7. Data retention

Personal Data for the above mentioned purposes will be stored for the time necessary for the performance of the activities related to the soundness of the report and, if applicable, until the end of the disciplinary procedures and/or until the legal/prosecuting proceedings are over. Later, Personal Data will be stored for the fulfilment of obligations (e.g. fiscal and accounting obligations) which continue even after the conclusion of the employment contract (art. 2220 Civil Code). After this period data will be cancelled or pseudonymised for statistical purposes.

8. Principles relating to processing of Personal Data

In compliance with art. 5 Regulation (UE) 2016/679 GDPR, Personal Data shall be:

- A. processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- B. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation');
- C. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- D. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that Personal Data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- E. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the Personal Data are processed; Personal Data may be stored for longer periods insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');
- F. processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

9. What are your rights

The Regulation (UE) 2016/679 GDPR gives the data subject certain rights (artt. from 15 to 23):

- i. obtain confirmation of the processing carried out by the Data Controller;
- ii. access Personal Data and be informed of their origin, the purposes and aims of the processing, the details of the parties to whom they are communicated, and the storage period of data or the criteria used to decide it;
- iii. withdraw consent at any time if this constitutes the basis for the processing of the data. However, withdrawal of consent does not prejudice the lawfulness of the consent-based processing prior to the withdrawal;
- iv. update or rectify Personal Data to ensure that they are always correct and accurate;
- v. erase Personal Data from the Data Controller's databases and/or files, including backups, if, amongst other factors, they are no longer necessary for the purposes of the processing or if the processing is seen as unlawful, and provided the legal conditions are met; and therefore if the processing is not justified on other, equally legitimate, grounds;
- vi. restrict the processing of Personal Data in some circumstances;
- vii. obtain Personal Data in digital format, to allow them to be transmitted to another Data Controller.

The Data Controller must fulfil any request coming from a reporting agent without delay, and in all cases within no more than one month after its receipt. The term may be extended for two months, if necessary, also considering the complexity and number of the requests received by the Data Controller.