

Privacy policy on the processing of the whistleblower's personal data (whistleblowing)

Pursuant to the Federal Data Protection Act (FDPA) and the Regulation (EU) 2016/679 (GDPR), we provide you with the necessary information regarding the processing of personal data collected within the framework of our **whistleblowing platform**.



1. CATEGORIES OF PERSONAL DATA SUBJECT TO PROCESSING | DEFINITIONS

Personal data: any information relating to an identified or identifiable person.

Sensitive data: personal data concerning: a. opinions or activities of a religious, ideological, political or trade union nature; b. physical health, intimate sphere or ethnic origin; c. social assistance measures; d. criminal or administrative proceedings and sanctions. In addition, the Data Controller may become aware of data concerning: - health status (e.g. absence due to illness, maternity, accident, etc.); - membership of trade unions and political parties or the performance of public duties (use of leave, expectations, etc.), or even religious beliefs (holidays permitted by law).

Data subjects: natural persons whose data are subject to processing.

Processing: any operation relating to personal data, regardless of the means and procedures adopted, namely, the collection, storage, use, review, communication, archiving or destruction of data.

Communication: i.e. making personal data accessible, for example by allowing access, transmission or publication.

Personal data provided - or otherwise acquired in accordance with the applicable legal and contractual provisions - will be processed in accordance with the DPA and confidentiality obligations.

In particular, we will process data relating to reports made by whistleblowers, which may include data relating to third parties.



2. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The entity that determines the purposes and means of this personal data processing is FERLINE SA, a company under Swiss law with registered office in Via Lucchini 2, 6900 Lugano (hereinafter also referred to as "Ferline" or "Controller" or "Company" or "we").

The contact details of the Data Controller are as follows: privacy.ferline@repi.com



3. PURPOSE OF PROCESSING | PERIOD OF DATA RETENTION | NATURE OF DATA PROVISION

PURPOSE OF PROCESSING	LEGAL GROUND	DATA RETENTION PERIOD	NATURE OF DATA PROVISION
a) Whistleblowing management: collection of data for enabling the sending of whistleblowing reports, through our online whistleblowing platform.	<p>The processing is necessary to comply with a legal obligation to which the data controller is subject.</p> <p>The processing of special data worthy of special protection is based on the fulfilment of obligations and the exercise of specific rights of the Data Controller and the Data Subject in the field of whistleblowing laws which the data controller is subject to.</p> <p>The processing of data relating to criminal convictions and offences is based on the legal obligation to which the data controller is subject.</p>	<p>For the time strictly necessary to process the report and, in any case, no longer than 5 years from the date of the communication of the outcome of the reporting procedure.</p> <p>In the event of legal proceedings, the aforementioned period shall be extended until all levels of proceedings have been exhausted.</p> <p>Personal data that are clearly not useful for processing a specific alert are not collected or, if they are accidentally collected, will be deleted immediately.</p>	<p>Providing the whistleblower's personal data is necessary, without prejudice to the right to report anonymously.</p>

b) Disclosure of the identity of the whistleblower and/or any other information from which that identity may be inferred, directly or indirectly, to persons other than those competent to receive and act upon the report.	<p>This processing activity is based on the data subject's express consent to the processing of his or her personal data.</p> <p>Consent for the possible disclosure of the data subject's identity will be requested by the reporting manager at a later stage after receipt of the report, if necessary.</p>	<p>Until consent is revoked and unless the identity has already been disclosed to a third party.</p>	<p>Provision of the whistleblower's personal data is optional.</p> <p>If it is not provided, the Data Controller may not disclose the identity of the person making the report and/or any other information from which that identity may be inferred to persons other than those competent to receive and follow up reports, subject to prior written notification of the reasons for disclosure.</p>
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3.1 MODALITIES OF DATA PROCESSING

The processing will be carried out in automated and/or manual form, using methods and tools designed to guarantee maximum security and confidentiality, by persons specially trained to do so. The personal data collected will be stored in a form that, where applicable, allows the identification of the persons concerned for a period not exceeding the achievement of the purposes for which the personal data are processed. Please note that no fully automated decision-making processes are carried out.



4. RECIPIENTS OF PERSONAL DATA

Personal data will be communicated to entities that will process the data as independent data controllers or data processors and will be processed by natural persons acting under the authority of the data controller and data processors based on specific instructions provided as to the purposes and methods of processing. The data will be communicated to recipients belonging to the following categories: - the person or internal office or the external party entrusted with the management of the internal whistleblowing channel; - third parties for the provision of the whistleblowing platform adopted by the Data Controller; - any judicial authorities and public authorities; - the Contact for the handling of requests from data subjects.



5. TRANSFER OF PERSONAL DATA OUTSIDE THE SWISS CONFEDERATION

In accordance with the provisions of the FDPA, in particular on the following grounds:

- if adequate safeguards, in this case contractual measures, are in place to ensure adequate protection abroad;
- the processing is directly related to the conclusion or performance of a contract and the data undergoing processing concern the other party;
- the communication takes place within the same legal entity or company or between legal entities or companies under a single management, provided that the issuer and the recipient comply with rules ensuring adequate data protection.



6. RIGHTS OF THE DATA SUBJECT

Pursuant to the FDPA and the GDPR, you are granted the following rights (non-exhaustive list)

- to obtain from the data controller confirmation as to whether or not personal data concerning you are being processed and, if so, to obtain access to the personal data (Access);
- obtain rectification of inaccurate or outdated personal data;
- be informed in writing and free of charge whether personal data concerning you are being processed;
- revoke any previously given consent to data processing;
- prevent the disclosure to third parties of any sensitive personal data;

- obtain the portability of your personal data or request that they be transferred to third parties;
- request the restriction or blocking of data processing, the prevention of disclosure of data to third parties, or the rectification or destruction of personal data;
- request the prohibition of specific processing of personal data and specific communication of personal data to third parties or the deletion or destruction of specific personal data;
- if neither the correctness nor the inaccuracy of the personal data can be proved, request that a note be added to indicate the objection;
- request that the rectification, destruction, blocking, especially communication to third parties, in addition to the note on the objection or ruling be communicated to third parties or published;
- have the processing of personal data declared unlawful.

Please note that **the data controller is required to guarantee the confidentiality of the person making the report**: the identity of the person making the report and any other information from which that identity may be inferred, directly or indirectly, will not be disclosed, without the express consent of the person making the report, to persons other than those competent to receive or follow up the report, without prejudice to the right of defence of the person making the report and where required by law.



7. ADDITIONAL INFORMATION | CHANGES | UPDATES

The Data Controller reserves the right to revise, update, add or remove any part of this privacy policy at its own discretion at any time. In case of changes, the date of update will be indicated.

Date of last update: 14.05.2024

ACKNOWLEDGEMENT OF READING THIS PRIVACY POLICY AND CONSENT OF THE DATA SUBJECT

The undersigned declares that he/she has read and understood the Privacy Policy for the whistleblower (**whistleblowing**)

AND HEREBY

☐ consents

☐ denies his/her consent

To the processing of his/her personal data for the purpose referred to in subsection (b) of the privacy policy on the processing of personal data of the whistleblower (whistleblowing)

SEND
