

Privacy Notice “whistleblowing” (ex D.Lgs. 24/2023)

The term **whistleblowing** refers to the procedure by which a person can report, disclose, or denounce, either anonymously or openly, violations of national or European Union regulations that harm the public interest or the integrity of the public administration, which they have become aware of within the context of their public or private work environment.



1. Data Controller

STEMIN SpA, with registered offices at via Via Guglielmo Marconi, 67 24040 – Comun Nuovo (BG), Tax ID Code and VAT reg. no. 02681790164, hereinafter “Controller”, guarantees full compliance with data protection regulations, and provides the following information with regard to data processing, pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation – GDPR) and subsequent amendments.



2. Data processed, purposes and legal grounds for processing

The personal data subject to processing may include:

- In the case of non-anonymous reports only, common personal data provided by the “reporters” through the reporting channel, such as personal details (e.g., name, surname, date and place of birth) and contact information (e.g., landline and/or mobile phone number, postal/email address);
- (Any) common or special data (as per Article 9 of the GDPR) of individuals involved or mentioned in the report.

The aforementioned personal data are processed by the Data Controller for the following purposes:

- a) Management of the report made pursuant to Legislative Decree No. 24/2023;
- b) Compliance with obligations provided by law or EU regulations;
- c) Defense or establishment of a right in civil, administrative, or criminal disputes.

Sede Legale e Amm e Unità Produttiva

Via Marconi, 67
24040 Comun Nuovo (BG) - Italy
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Unità Produttiva

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Membro degli Accordi di Mutuo Riconoscimento EA, IAF e ILAC Signatory of EA, IAF and ILAC Mutual Recognition Agreements
ISO 9001 SGQ N°044MS:2116817
ISO 14001 SGA N°0044MS:2116819
ISO 45001 SCR N°044MS:2116818



Certificato AEO
IT AEOF 12 0625



SILVER | Top 15%
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AUG 2024



ISO 14067
BUREAU VERITAS
Certification
Organizzazione con CFP Systematic Approach certificato da Bureau Veritas Italia Spa in conformità alla norma ISO 14067:2018



ISO 14064-1
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Certification
Dichiarazione di verifica IT330422-1 del: 21 marzo 2024 relativa all'inventario dei GHG rilasciata da Bureau Veritas per l'anno solare 2022

The legal basis that legitimizes the processing:

- With respect to the purposes referred to in point 2 letters a) and b), it is the fulfillment of a legal obligation (Art. 6.1 letter c) of the GDPR);
- With respect to the purposes referred to in point 2 letter c), it is the legitimate interest of the Data Controller (Art. 6.1, letter f) of the GDPR).



3. Nature of provision

The provision of personal data is optional and the report can also be anonymous. The failure to provide any personal data will have no consequence on the reporter, but it may, however, affect the investigation of the report.

Anonymous reports will only be considered if they are adequately detailed, so as to reveal facts and situations related to specific contexts.



4. Processing locations and methods and data retention times

The data is collected and managed through the technological platform of Formalize ApS.

For completeness, we inform you that more information regarding the GDPR compliance of Whistleblowing Solutions Impresa Sociale S.r.l. can be found [here](#).

The collected data will be processed using electronic or otherwise automated, IT, and telematic tools, or through manual processing with logic strictly related to the purposes for which the personal data was collected and, in any case, in a way that ensures the confidentiality of the reporter's identity and the content of the reports and related documentation.

The data is retained for the time strictly necessary to manage the purposes for which the data itself is processed ("principle of storage limitation", Art. 5, EU Regulation 2016/679) or in compliance with the deadlines provided by current regulations and legal obligations.

In any case, the Data Controller practices rules that prevent the indefinite retention of data and therefore limits the retention time in compliance with the principle of data minimization.

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5. Authorized subjects, data processors and data communication

The processing of data collected is performed by the Data Controller's internal staff, appointed for this purpose and authorised to perform processing according to specific instructions issued in compliance with current regulations.

The data collected, within the limits pertaining to the purposes of processing stated and in the event it is necessary or useful for the execution of the purposes itself, can be processed by third parties appointed by external Processors, i.e., according to cases, communicated to those subjects necessary for the correct completion of the aims set out in point 2.

The data collected can be provided, in the event of lawful request, solely in the cases envisaged by law, by the Legal Authority.

Under no circumstances will your data be circulated in any way.



6. Data transfer to non-EU countries

The collected data will not be subject to transfer abroad.



7. Data subject's rights

With regard to the personal Data communicated, the Data subject has the right to exercise the following rights:

- (Art. 7.3 Regulation EU 679/2016 – GDPR) withdrawal of consent;
- (Art. 15 Regulation EU 679/2016 – GDPR) accessing and asking for a copy;
- (Art. 16 Regulation EU 679/2016 – GDPR) requesting correction;
- (Art. 17 Regulation EU 679/2016 – GDPR) requesting deletion (“right to be forgotten”);
- (Art. 18 Regulation EU 679/2016 – GDPR) obtaining data minimisation;
- (Art. 20 Regulation EU 679/2016 – GDPR) receiving data in a structured format, commonly used and readable from an automatic device, for the purposes of exercising the right to portability;

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g. (Art. 21 Regulation EU 679/2016 – GDPR) opposing processing.

The data subject can exercise their rights as well as ask for more information about their Personal Data, by sending an email to info@steminspa.it and specifying the content of their request in the subject line.

Requests concerning the Data subject's choice to avail of their rights will be issued without undue delay and, in any case, within one month of the request; only in particularly complex cases and large number of requests, may this be extended by a further 2 (two) months.

Please remember that it is your right (as per art. 77 Regulation EU 679/2016 – GDPR) to submit a complaint to the Data Protection Authority, whose contact information is available [here](#)

Latest update: 12nd June 2025

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