	WHISTLEBLOWING REPORT	N.	Whistleblowing
	INFORMATION ON THE PROCESSING OF PERSONAL DATA pursuant to art. 13 of EU Regulation 2016/679	Rev.	00
		Data	17/12/2023
		Pag.	1 di 2

1. 1. IDENTITY AND CONTACT DETAILS:

DATA CONTROLLER: Novamedisan Italia srl sita in Via dei Lapidari, 3 – 40129 Bologna (BO), contatti: Tel. 051.327911
– E-mail: info@novamedisan.it

2. PURPOSE AND LEGAL BASIS OF PROCESSING

Personal data will be processed in accordance with the law for the following purposes:

Management of the reports provided for in the legislative decree of 10 March 2023, n. 24 (hereinafter also "Decree"), published in the Official Journal of 15 March 2023, EU Directive 2019/1937 concerning "the protection of persons who report violations of Union law" was transposed into Italian law.

The report must be as detailed as possible in order to allow the facts to be clarified by the parties competent to receive and manage it. In particular, contain the circumstances of time and place in which the reported event occurred; the description of the fact; the personal details or other elements that allow the identification of the person to whom the reported facts can be attributed, and any attached documents that can provide elements of substantiation of the facts being reported and indication of other subjects potentially aware of the facts.

As required by the decree, the report can be sent through the following channels:

- in written form by registered mail;
- oral, through telephone lines or alternatively with voice messaging systems;
- at the request of the reporting person, through a direct meeting set within a reasonable time.

The data processing takes place on the basis of a legal obligation to which the Data Controller is subject (art. 6, par. 1, letter c)).

As required by the law, the processing of data will be conditioned by the express consent of the reporting party (art. 6, par 1 letter a)) in the following cases:

- i. within a disciplinary proceeding, if they are necessary for carrying out the proceeding;
- ii. for recording and/or transcribing the report in person, by telephone or via voice messaging;
- iii. disclosure to persons other than those competent to receive or follow up on reports.

3. RECIPIENTS OF THE DATA AND POSSIBLE DATA TRANSFER

As required by the art. 4, paragraph 2, of the Decree, the management of the reporting channel has been assigned to a specifically designated person with the obligation to guarantee the confidentiality of the identity of the reporter and of any other information, including any attached documentation, from which one can directly or indirectly trace his identity. In the case of reporting using IT methods, this is managed with a compliant whistleblowing platform, with the signing of an agreement, as required by art. 28 of the GDPR, with the platform manager, whose data can be requested from the owner .

4. DATA PROCESSING AND STORAGE METHODS

The data processing is carried out manually (for example, on paper) and/or through IT tools with logic related to the aforementioned purposes and, in any case, in such a way as to guarantee the security and confidentiality of the data. In the case of processing with consent, as required by art. 7 of the GDPR, the interested party has the right to revoke his consent at any time by communicating this to the owner.


The reports and the related documentation are kept for the time necessary to process the report and, if necessary, to adopt the resulting disciplinary measures and/or to resolve any disputes initiated following the report. The processing will not continue beyond 5 years from the date of communication of the final outcome of the reporting procedure. The data may subsequently be anonymized for statistical or historicization purposes

5. TRANSFER AND AUTOMATED PROCESSES

The data processed are not transferred to non-EU countries. The processing does not involve automated decision-making processes.

6. RIGHTS OF THE INTERESTED PARTY

Interested parties may ask the Data Controller, by written request, for access to the data concerning them, for their rectification, integration or cancellation, as well as the limitation of processing or any other right referred to in articles 15 to 22 of the GDPR, if the conditions to be highlighted in the request are met; this, however, except for the existence of legitimate reasons prevailing over the interests, rights and freedoms of the interested party, the assessment,

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		Data	17/12/2023
		Pag.	2 di 2

exercise or defense of a right in court or other legal obligations that the Data Controller must fulfill or otherwise possible disposition of the Public Authorities or the Judicial Authority or the Police Bodies.

Interested parties also have the right to lodge a complaint with the Guarantor Authority for the protection of personal data in case of illegitimate or illicit processing of their data by the Data Controller.