

**INFORMATION NOTICE PURSUANT TO ARTICLE 13 OF EU REGULATION 2016/679**  
**- WHISTLEBLOWING -**

**SNATT LOGISTICA S.p.A.**, (Fiscal Code and VAT n.: 02060420359) (hereinafter "SNATT"), in the person of its legal representative pro tempore, with registered office in Campegine (RE), via Kennedy, 20, in its capacity as Data Controller pursuant to Articles 4 no. 7) and 24 of EU Regulation no. 2016/679 (GDPR), informs, pursuant to Art. 13 of the GDPR, that the personal information described in Art. 1 will be processed, by SNATT, for the performance of the (macro) purpose described in Art. 2.

**1. Category of personal data being processed**

SNATT collects and processes, for the purpose of pursuing the (macro) processing purpose described in Article 2, only such information as is necessary, indispensable and relevant for the purpose of assessing and managing, in a complete and effective manner, a report of a circumstantiated (alleged) violation/unlawful conduct pursuant to Art. 1 paragraph 1) and 2 paragraph 1) of Legislative Decree no. 24 of 10.3.2023, with the exception of reports/concerns pursuant to Article 1 paragraph 2) of Legislative Decree no. 24 of 10.3.2023 (hereinafter "**report**" and/or "**whistleblowing**"). Specifically, SNATT specifies that the report is potentially capable of containing, by nature, the personal data ex art. 4 no. 1) of the GDPR of the "whistleblower"<sup>1</sup> (unless the same is made anonymously, in compliance with the provisions of the so-called (unless the same is carried out anonymously, in compliance with the provisions of the so-called "soft law" on the subject), of the "whistleblower/whistleblower"<sup>2</sup> and, possibly, of further "**third parties**" (e.g. "facilitator"<sup>3</sup>; witness; work colleague of the whistleblower), as well as may include "special" personal data pursuant to Art. 9(1) of the GDPR and/or "judicial" personal data pursuant to Art. 10 of the GDPR referring, directly or indirectly, to one or more of the subjects described above: in this regard, SNATT further points out that it will only process the information contained in the report that is indispensable for the performance of the (macro) purpose referred to in Art. 2, providing, therefore, to promptly delete and/or anonymise that information which is excessive and unnecessary for this purpose, in compliance with the principle of minimisation/relevance/non-excessiveness/indispensability pursuant to Art. 5 paragraph 1) letter c) of the GDPR and Art. 13 paragraph 2) of Legislative Decree no. 24/2023 (hereinafter, for the sake of simplicity, only "**personal data**").

In this regard, SNATT also points out that the "whistleblower", the "whistleblower/whistleblower", the "whistleblower/involved person" and/or the "third party/parties" uniquely qualify as a data subject under Article 4(1) of the GDPR.

**2. Purpose of processing and legal basis**

**2.1.** The personal data of the data subject are processed by SNATT in order to fulfil the following (macro) processing purpose:

- a. Receipt, analysis, assessment, verification and management of a report, including any ensuing investigation/investigation and protection activities<sup>4</sup>, including the possible exercise of the disciplinary system, as well as the possible exercise, protection or defence of a right, including in court.

In this regard, SNATT specifies that the legal basis of the (macro) processing purpose referred to in Article 2.1. letter a) is to be found in the following regulatory provisions, in addition to the aforementioned D. Legislative Decree no. 24/2023: Article 6 paragraph 1) letter c) e) of the GDPR, for personal data<sup>5</sup>; Article 9 paragraph 2) letter b) f) g) of the GDPR, for any so-called special personal data; Article 10 of the GDPR (to be read, together with Article 2 octies paragraphs 1) and 3) letter e) of the amended Privacy Code), for so-called judicial personal data.

In relation to the analysis, assessment, verification and management of a report (including the consequent and possible investigative activities), SNATT specifies that it will respect, inter alia, the confidentiality protections provided for in Articles 3 (4) and (5), and 12 of Legislative Decree No. 24/2023, as well as the protection measures provided for in the relevant Chapter III).

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<sup>1</sup> See Article 2(1)(g) of Legislative Decree No. 24/2023: "reporting person": "the natural person who reports or publicly discloses information about violations acquired in the context of his or her work context". For the definition of "work context", see Article 2(1)(i) of Legislative Decree No. 24/2023: "work context": "the work or professional activities, present or past, carried out in the context of the relationships referred to in Article 3(3) or (4), through which, regardless of the nature of such activities, a person acquires information about violations and in the context of which he or she could risk retaliation in the event of a report or public disclosure or a complaint to the judicial or accounting authorities". Cf. also, Art. 3 para. 3) of Legislative Decree No. 24/2023: "3. Without prejudice to the provisions of paragraphs 1 and 2, the provisions of this decree shall apply to the following persons who report, denounce to the judicial or accounting authorities or publicly disclose information on violations of which they have become aware in the context of their work (a) employees of public administrations [...]; (b) employees of public economic entities, private law entities subject to public control pursuant to Article 2359 of the Civil Code, in-house companies, public law bodies or public service concessionaires; (c) employees of private sector entities, including employees whose employment relationship is governed by Legislative Decree 15 June 2015, no. 81, or by Article 54-bis of Decree-Law No. 50 of 24 April 2017, converted, with amendments, by Law No. 96 of 21 June 2017; d) self-employed workers [...] holders of a collaboration relationship [...] who carry out their work activity with public sector entities; e) workers or collaborators, who carry out their work activity with public sector entities [...] who supply goods or services or perform works for third parties; f) freelancers and consultants who work for public sector entities; g) volunteers and trainees, whether paid or unpaid, who work for public sector entities; h) shareholders and persons with administrative, management, control, supervisory or representative functions, even when these functions are performed de facto for public sector entities.

<sup>2</sup> See Article 2(1)(l) of Legislative Decree No. 24/2023: "person involved": "the natural or legal person mentioned in the internal or external report or in the public disclosure as the person to whom the breach is attributed or as the person in any way implicated in the breach reported or publicly disclosed".

<sup>3</sup> See Article 2(1)(h) of Legislative Decree No. 24/2023: "facilitator": "a natural person who assists a reporting person in the reporting process, operating within the same work context and whose assistance must be kept confidential".

<sup>4</sup> Cf. Chapter III) of Legislative Decree No. 24/2023 (to be read in conjunction with Articles 3 (5) and 12 thereof).

<sup>5</sup> And Art. 6 paragraph 1) letter a) of the GDPR, in the occurrence of the hypotheses ex Art. 12 paragraphs 2) and 5) of Legislative Decree no. 24/2023.

### 3. Retention period.

**3.1.** In compliance with Article 13 paragraph 2) letter a) of the GDPR, SNATT communicates the following retention periods/criteria (which are alternative to each other, depending on the circumstances of the case), at the end of which the personal data, processed for the performance of the (macro) processing purpose referred to in Art. 2.1. letter a), of the data subject will be subject to erasure, destruction or anonymisation: (i) as a general rule, no later than 5 years, starting from the date of the communication of the final outcome of the reporting procedure, in compliance with Art. 14 paragraph 1) of Legislative Decree no. 24/2023; (ii) on the other hand, in the event that the report is followed by a judicial and/or disciplinary action against the reporter and/or the reported person, until the conclusion of the relevant proceedings and the expiry of the relevant time limits for any appeal, a time criterion that may be extended in order to comply with a legal obligation (even if one has arisen) or to assert or defend a right, including in court.

### 4. Target audience.

**4.1.** In compliance with Article 13 paragraph 1) letter a) of the GDPR, SNATT specifies that the personal data of the relevant data subject may be subject to communication, where appropriate and necessary, to one or more recipients pursuant to Article 4 no. 9) of the GDPR, identified as follows, in general terms, by category: (i) for the performance of the (macro) processing purpose referred to in Article 2.1. letter a): parties authorised pursuant to Articles 4 no. 10), 29 and 32 paragraph 4) of the GDPR for processing by SNATT; ANAC; ordinary/accounting judicial authorities; consultants or companies of various kinds that provide, in any case, services and/or services, including professional services, connected, even indirectly, to the performance of the (macro) processing purpose in question (e.g. IT company; legal consultant). SNATT also specifies that the personal data of the relevant data subject shall not be subject to any dissemination pursuant to Article 2b, paragraph 4) letter b) of the Privacy Code, for the purposes of performing the (macro) processing purpose referred to in Article 2.1. letter a).

### 5. Transfer.

**5.1.** The personal data of the relevant data subject are/may be stored in automated, partially automated and/or non-automated archives belonging to or otherwise traceable, even indirectly, to SNATT, and located within the European Economic Area (EEA).

### 6. Rights of the data subject.

**6.1.** In relation to the personal data of the relevant data subject, SNATT informs the latter of the right to exercise the following rights, which may be subject to the limitations provided for in Articles 2 undecies (in particular: paragraph 1) letters e) and f); paragraph 3))<sup>6</sup> and 2 duodicies of the Privacy Code: right of access pursuant to Article 15 of the GDPR: right to obtain confirmation as to whether or not personal data is being processed, as well as the information referred to in Article 15 of the GDPR (e.g. purpose of processing, storage period); right of rectification under Art. 16 of the GDPR: right to correct, update or supplement personal data; right to erasure under Art. 17 of the GDPR: right to obtain the erasure or destruction or anonymisation of personal data, where the conditions listed in the same article apply; right to restriction of processing under Art. 18 of the GDPR: the right to obtain the limitation of processing in the event of the cases governed by Article 18 of the GDPR; the right to data portability pursuant to Article 20 of the GDPR: the right to obtain personal data provided to SNATT in a structured, commonly used and machine-readable format (and, where required, to transmit them directly to another data controller), where the specific conditions set out in the same article exist (e.g. legal basis of consent and/or execution of a contractual agreement and/or execution of a contractual agreement). legal basis of consent and/or performance of a contract; personal data provided by the data subject); right of objection under Art. 21 of the GDPR: right to obtain the cessation, on a permanent basis, of a certain processing of personal data; right to lodge a complaint with the Supervisory Authority (i.e. the Italian Data Protection Authority) under Art. 77 of the GDPR: right to lodge a complaint where it is considered that the processing under analysis violates national and EU data protection legislation.

**6.2.** In addition to the rights described in Art. 6.1. above, SNATT points out that, in relation to the personal data of the data subject, there is, where possible and conferrable, the right to exercise, on the one hand, the (sub)right provided for in Art. 19 of the GDPR ("The controller shall communicate to each of the recipients to whom the personal data have been transmitted any rectification or erasure or restriction of processing carried out pursuant to Article 16, Article 17(1) and Article 18, unless this proves impossible or involves a disproportionate effort. The data controller shall inform the data subject of such recipients if the data subject so requests"), to be considered connected and related to the exercise of one or more of the rights regulated in Articles 16, 17 and 18 of the GDPR; on the other hand, SNATT specifies that, in relation to the personal data of the relevant data subject, there is, where possible and conferring, the right to exercise the right provided for in Art. 22 paragraph 1) of the GDPR ("The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or significantly affects him or her in a similar way"), subject to the exceptions provided for in paragraph 2) below.

**6.3.** In observance of Article 12 paragraph 1) of the GDPR, SNATT undertakes to provide the communications referred to in Articles 15 to 22 and 34 of the GDPR in a concise, transparent, intelligible, easily accessible form and in simple and clear language: this

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<sup>6</sup> Art. 2 undecies paragraph 3) of the Privacy Code: "In the cases referred to in paragraph 1, letters a), b), d), e), f) and f-bis), the rights referred to in that paragraph shall be exercised in accordance with the provisions of the law or regulations governing the sector, which must at least contain measures aimed at regulating the areas referred to in Article 23(2) of the Regulation. The exercise of the same rights may, in any event, be delayed, limited or excluded by reasoned notice given without delay to the data subject, unless such notice is likely to jeopardise the purpose of the restriction, for such time and to the extent to which this constitutes a necessary and proportionate measure, having regard to the fundamental rights and legitimate interests of the data subject, in order to safeguard the interests referred to in paragraph 1(a), (b), (d), (e), (f) and (f-bis). In such cases, the rights of the data subject may also be exercised through the Garante in the manner set out in Article 160. In such cases, the Garante shall inform the data subject that it has carried out all the necessary checks or that it has conducted a review, as well as of the data subject's right to seek judicial remedy. The data controller shall inform the data subject of the possibilities referred to in this paragraph'.

information will be provided in writing or by other possibly electronic means or, at the request of the data subject, will be provided orally provided that the identity of the data subject is proven by other means.

**6.4.** In compliance with Article 12 paragraph 3) of the GDPR, SNATT informs that it undertakes to provide information regarding the action taken with respect to a request pursuant to Articles 15 to 22 of the GDPR without undue delay and, in any event, no later than one month after receipt of the request; this period may be extended by 2 months if necessary, taking into account the complexity and number of requests (in which case, SNATT undertakes to inform of such extension and the reasons for the delay, no later than one month after receipt of the request).

**6.5.** The above-described rights (with the exception of the right under Art. 77 of the GDPR) may be exercised, taking into account, however, the limitations better described in Articles 6.1. and 6.2. above, by means of the contact details set out in Article 7 below.

## **7. Contact details.**

**7.1.** SNATT can be contacted at the following address: [snattlogisticaspa@legalmail.it](mailto:snattlogisticaspa@legalmail.it)

**7.2.** The Data Protection Officer (DPO) pursuant to art. 37 of the GDPR, appointed by SNATT, is the lawyer Gabriele Borghi, who can be contacted at the following address: [dpo@snatt.it](mailto:dpo@snatt.it)

Campegine (RE), there 1.12.2025 (date of last update).

**SNATT LOGISTICA S.p.A.**

(in the person of its legal representative pro tempore)

