



POLICY CONCERNING THE PROCESSING OF PERSONAL DATA OF THE PERSONS REPORTING VIOLATIONS OF EU LAW OR NATIONAL LEGISLATION, OF THE PERSONS INVOLVED, NAMED PERSONS AND FACILITATORS

CSM TUBE spa unipersonale, in its capacity as data controller (hereinafter 'CSM TUBE'), issues this information notice to the reporting party, the persons involved, the persons mentioned and the facilitators in compliance with the European and Italian regulations on personal data protection.

Purposes and legal basis of processing.

CSM TUBE processes personal data for the purpose of carrying out the necessary preliminary investigative activities aimed at verifying the legitimacy of the reported fact and taking the consequent measures.

Consent is not required because processing is necessary for the fulfilment of CSM TUBE's regulatory obligations under Legislative Decree. 10 March 2023, no. 24.

Categories of data and their sources.

CSM TUBE processes data of common nature (name, surname, qualification, etc.), data of special nature (data concerning health, trade union membership, etc.) and/or data concerning criminal convictions, offences and security measures: this information may be collected directly from the person it refers to (hereinafter referred to as the "Data Subject") and/or from third parties (e.g. when the reporting party provides information on the reported person and/or on other persons mentioned and/or on the facilitator, or when further information/documents are acquired from other CSM TUBE structures during the preliminary investigation).

Data retention period.

The collected data are retained for the time necessary to process the report and for the period necessary to complete the related administrative procedure or any legal proceedings initiated, and in any case no longer than 5 years from the date of communication of the final outcome of the reporting procedure.

Nature of the provision of data and consequences in the event of refusal.

The provision of personal data is optional, but necessary for the handling of reports and related activities, with the consequence that any refusal to provide such data prevents such handling.

Target categories.

During the handling of the report, personal data may be processed by internal persons specifically authorised for the purposes indicated, as well as service providers or other external parties (e.g. platform operators used for the handling of reports), who will process the data as data controllers on behalf of CSM TUBE.

Where applicable, personal data may be passed on to third parties to whom disclosure is required by law (e.g. judicial authorities, national anti-corruption authorities, etc.).

Under no circumstances will personal data be disseminated.

Transfer of data to another Country and/or an international organisation

The personal data shall not be transferred to non-EU Countries or to international organisations.

Rights of the data subjects.

Data subjects have the right to obtain access to their personal data, to have them updated (or corrected, if inaccurate), to have them deleted or to have the processing concerning them restricted, subject to the respective conditions and in particular within the limits of the provisions of art. 2-undecies of Legislative Decree No. 196/2003.

To exercise your rights, you may use the form available at <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and forward it to the subject in charge of handling the report, by contacting them through the channel used for the report, i.e. at CSM TUBE with registered office in Cimavilla di Codognè (TV), via del Lavoro n. 60. The Data Subject also has the right to lodge a complaint with the competent supervisory board, the Italian Data Protection Authority (www.garanteprivacy.it).