



**INFORMATIVE LETTER PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679  
ON THE PROCESS OF PERSONAL DATA OF PERSONS FOR REPORTING OFFENSES  
– (WHISTLEBLOWERS) -  
ACCORDING TO LEGISLATIVE DECREE 24/2023**

Italia Marittima S.p.A. undertakes to respect your privacy and to protect your personal data, namely those data that can in some way lead to your identification following the presentation of the reports referred to in Legislative Decree 24/2023.

This information letter concerning the processing of personal data contains information about the reasons and methods in which the Company will process your personal data in relation to the performances set forth by Legislative Decree no. 24/2023 and what kind of personal data will be collected.

The Controller of your personal data in relation to this Informative Letter is Italia Marittima S.p.A., whose contact details are:

Headquarters: Passeggio S. Andrea, 4— 34123 Trieste, Italy  
Telephone: + 39 (0)40 3180 111  
Fax: + 39 (0)40 3180388  
Certified e-mail address: [mgt@pec.italiamarittima.it](mailto:mgt@pec.italiamarittima.it)

Personal data are processed by the Company Ambient 7, as Provider of the Whistleblowing on line platform “SEGNALASICURO.ORG”, as well as by the Responsible for the managing of the internal Reports *ex* Legislative Decree 24/2023, Mr. Giulio Mosetti, Chairman of the Supervisory Body, both as External Data Processors for the purpose appointed pursuant to article 28 of Regulation (EU) 2016/679 ("GDPR") in the execution of their own duties related to the task of ascertaining in the interest of the Company any offenses reported that may be reported by the employees of Italia Marittima S.p.A. or by third parties and falling within the regulatory provisions pursuant to Legislative Decree 24/2023.

## 1. LEGAL BASIS OF THE PROCESSING

The legal basis of the processing are the following:

- a) the legitimate interest of the Controller, pursuant to art. 6, par.1, lett. f) of the GDPR, which, having become aware of the report submitted by you, intends to guarantee and preserve the integrity of the company assets;
- b) the need to fulfill a legal obligation to which the Data Controller is subject, with reference to the provisions contained in Law 179/2017, in Legislative Decree n. 231/2001 and in Legislative Decree n. 24/2023;
- c) the need for the Controller to ascertain, exercise or defend a right in court, if necessary;
- d) your specific consent pursuant to articles 6, par. 1, lit. a) and art. 9, par. 2, lit. a), of the GDPR.

Please note that the provision of personal data (name, surname and contact data) in the reports referred to in Legislative Decree 24/2023 is optional. However, failure to provide them could jeopardize the investigation of the report: anonymous reports, in fact, will be taken into consideration only if they are adequately detailed, so as to bring out facts and situations connected to specific contexts.

## **2. TYPES OF DATA PROCESSED AND PURPOSE OF THE PROCESSING**

The data provided by the whistleblower in order to represent the alleged illegal conduct of which he has become aware due to his service relationship committed by subjects who interact with him for various reasons, are processed for the purpose of carrying out the necessary preliminary activities aimed at verify the legitimacy of the fact reported and the adoption of the consequent measures.

## **3. DATA RECIPIENTS**

The recipients of the data collected following the report, if appropriate, are the Judicial Authority, and the ANAC, in addition to the Responsible for the managing of the internal Whistleblowing Reports, as External Data Processor, as well as the Provider of the Whistleblowing on line platform per Legislative Decree 24/2023 e as External Data Processor.

## **4. PERIOD OF CONSERVATION OF PERSONAL DATA**

The personal data collected are kept for a period not exceeding ten years, starting from the date of receipt of the Report, as well as for the entire period necessary to carry out any proceedings arising from the management of the report (disciplinary, criminal, accounting).

This is without prejudice to retention for a longer period in relation to requests from public authorities and the Guarantor Authority for the protection of personal data.

The retention of personal data, even special ones, for a longer period is reserved, within the limits of the limitation period of the rights, in relation to needs connected to the exercise of the right of defense in the event of disputes.

With reference to the information on the possible methods of processing your personal data by our Company by means of electronic tools, as well as the instructions on the correct use by you of the IT company tools and of the databases to which you are authorized to access, please refer the specific "Company's Code for the use of the Informative Sytem" adopted by the Company.

## **5. RIGHTS OF INTERESTED PARTIES**

In accordance with Regulation (EU) 2016/679, you are the holder of certain rights in relation to the processing of your personal data, which are indicated below.

- Access rights to your personal data collected by the Company. You have the right to obtain a copy of your personal data collected by the Company and to verify they are processed correctly.
- Right to rectification, correction and updating of your personal data collected by the Company. You have the right to correct any incomplete or inaccurate information collected about you by the Company.
- Right to receive the personal data supplied by you in a structured format that can be read by an automatic device (data portability) and the right to transmit such data to another person in charge of the processing, as long as it is in the context of the performance of an employment relationship.
- Right to cancel your personal data. You have the right to request the cancellation or removal of your personal data if there is no longer a reason for the processing of the same by the Company.

You have the right to request the deletion of personal data if you have exercised your right to object to the processing.

- Right to limit the processing of your personal data. You have the right to request the Company to suspend the processing of your data (if, for example, you want to verify the correctness of the processing or the purposes of the processing).
- Right to object to the processing of your personal data in certain circumstances. This right is applicable only in the event that the processing of your data is based on a legitimate interest of the Company or in case of profiling of your data.
- Right to withdraw consent. If the processing of your personal data is based on your consent, you have the right to withdraw the consent given to the processing of the same at any time.

Trieste,

**Italia Marittima S.p.A.**