
Subject: PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA FOR WHISTLEBLOWERS

This notice is provided, pursuant to Article 13 of Regulation (EU) 2016/679 on the protection of personal data, to individuals (e.g. directors, managers, employees, consultants, supplier workers, etc.) who report alleged irregularities or unlawful conduct in the work environment.



DATA CONTROLLER

Turboden S.p.A.
Registered office: Via Cernaia,10 – 25124 Brescia (BS)
e-mail: privacy@turboden.it



DPO

For questions regarding this privacy notice or the way data is handled, you can contact the Data Protection Officer (DPO) at: DPO@turboden.it



SOURCE AND TYPES OF DATA PROCESSED

Personal data are provided by the whistleblower when submitting a report through the internal reporting channel made available by the Controller.

In particular:

- name, surname and contact details of the whistleblower (unless the report is anonymous);
- a description of the facts and events subject to the report, which may indirectly identify the whistleblower and/or reveal information concerning special categories of data under Articles 9 or 10 GDPR.



PURPOSES AND METHODS OF PROCESSING

- Acquisition and management of internal reports of violations of national and European whistleblowing regulations, including investigative steps aimed at verifying potential breaches.
- Possible disclosure of the whistleblower's identity to persons other than those authorised to receive or follow up on the report.

The information provided—and the identity of the whistleblower (if the report is not anonymous)—will be treated as confidential at all stages of processing. In particular, the whistleblower's identity and the content of the report that could directly or indirectly reveal it will not be disclosed to third parties, nor to the individuals mentioned in the report or to the heads of the relevant organisational units.

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The whistleblower's identity may only be disclosed in cases provided for by law or within judicial proceedings.



LEGAL BASIS

Compliance with a legal obligation under Legislative Decree 24/2023 (Art. 6(1)(c) and Art. 9(2)(g) GDPR, and Art. 2-octies of the Italian Privacy Code) for Purpose 1. Explicit consent of the whistleblower for Purpose 2



DATA RETENTION PERIOD

Reports and the related documentation are retained for the time necessary to manage them and, in any case, no more than five years from the date the report is closed.

However, where applicable, such data may be kept longer if necessary for the application of sanctions or disciplinary measures.



NATURE OF DATA PROVISIONS

Providing data related to the report is optional. The whistleblower may submit the report anonymously.
However, incomplete or missing information regarding the reported event and the individuals involved may severely limit the ability to conduct necessary investigations.



RECIPIENTS OF DATA

Personal data and information provided may be accessed, processed and used by:

- internal personnel of the office responsible for managing the reporting channel;
- members of the Supervisory Body;
- internal collaborators or consultants operating under the Controller's authority and expressly authorised;
- the external provider of the reporting platform, appointed as Data Processor pursuant to Art. 28 GDPR.

In addition, aggregated and anonymous reports will be shared with MHI EMEA, Ltd. Finally, the data may be disclosed to subjects legally entitled to access them under laws, regulations, or EU provisions.

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DATA SUBJECTS' RIGHTS

The whistleblower may exercise the rights provided by the GDPR, including the right to:

- access personal data and all information related to the submitted report (Art. 15);
- rectify or delete inaccurate data and supplement incomplete data (Arts. 16–17).

Requests must be addressed to the Data Controller at the e-mail address indicated above, specifying the subject of the request, the right being exercised, and any information necessary to verify the legitimacy of the request.



WITHDRAWAL OF CONSENT

The whistleblower may withdraw at any time the consent provided regarding the disclosure of their identity to persons other than those authorised, using the reporting channel.

The lawfulness of any disclosures made prior to the withdrawal remains unaffected.



COMPLAINT TO THE AUTHORITY

The whistleblower has the right to lodge a complaint with the Italian Data Protection Authority (Art. 77 GDPR).