
Subject: WHISTLEBLOWING PRIVACY NOTICE FOR THIRD PARTIES

This privacy notice is provided, pursuant to Article 14 of Regulation (EU) 2016/679 on the protection of personal data, to reported individuals, witnesses, and other persons involved or mentioned in a whistleblowing report who may be identifiable.



DATA CONTROLLER

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



DPO

For any questions regarding this privacy notice or the way your data are handled, you may contact the Data Protection Officer (DPO) at DPO@turboden.it



SOURCES 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 the context of the acquired report, the Controller may process common personal data as well as special categories of data under Articles 9 and 10 GDPR, either identifiable from the content of the report or collected during subsequent investigative phases.



PURPOSE OF PROCESSIONG

Acquisition and management of internal reports of violations of national and European whistleblowing regulations, including investigative steps aimed at verifying potential breaches.



LEGAL BASIS

Fulfilment of 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).



DATA RETENTION PERIOD

Reports and related documentation are retained for the time necessary for their management and, in any case, no longer than five years from the date the report is closed.

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

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**DATA RECIPIENTS**

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

- internal personnel of the office responsible for managing the whistleblowing 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 under Art. 28 GDPR.

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

**DATA SUBJECT RIGHTS**

With regard to their personal data processed in the context of the report, the persons involved or mentioned cannot exercise the rights provided by the GDPR where, for the time and within the limits necessary and proportionate, this constitutes a required measure in accordance with Art. 23 GDPR and Art. 2-undecies of the Italian Privacy Code (Legislative Decree 196/2003, as amended). The exercise of such rights could in fact effectively and concretely undermine the confidentiality of the whistleblower's identity and the proper conduct of investigative activities.

**COMPLAINT TO THE AUTHORITY**

Individuals have the right to lodge a complaint with the Italian Data Protection Authority (Art. 77 GDPR).