



PRIVACY NOTICE WHISTLEBLOWER
(pursuant to Art. 19 of the Federal Act on Data Protection (FADP)
and Art. 13 and 14 of Regulation (EU) 2016/679)

The company (hereinafter: Data Controller), by company choice and for greater guarantee for the personal data of all interested parties, has also complied with European and Swiss legislation on the protection of personal data.

The Company, as data controller, pursuant to art. 19 of the Federal Law on Data Protection (hereinafter: FADP) and Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter: "GDPR") informs potential whistleblowers, whistleblowers, facilitators and any other natural person potentially involved in the management of reports that the processing of personal data may concern heterogeneous categories of information relating to natural persons, including, at least potentially, special categories of personal data (Art. 9, GDPR and Art. 5 FADP) and personal data relating to criminal convictions and offences (Art. 10, GDPR and Art. 5 FADP). The legal bases legitimizing the processing are the fulfilment of a legal obligation (art. 6, paragraph 1, letter c), GDPR) and, with regard to particular and criminal data, respectively the provisions of art. 9, paragraph 2, letter g) and art. 10.

No identification data is required for the transmission of the report, except for an e-mail address to which the feedback on the management of the report will be delivered. In order to protect their anonymity, the whistleblower who wishes not to reveal his or her identity is required to indicate an e-mail address from which no identifying information can be obtained.

Any personal data contained in the text of the report, relating to the whistleblower himself or to the reported persons, facilitators, third parties involved in any capacity in the reported facts (hereinafter: the "Data") will be visible exclusively to the specialized external company and the Group HR Manager, as the internal contact person for the management of reports. The specialized external company operates as a data processor pursuant to Article 28, GDPR, as well as professional, technological or telecommunications subcontractors. No further cases of communication of Data are envisaged, except in cases of exercise of the rights to assert or defend a right of the data controller or processor or third parties. Personal data will also be processed outside the European Economic Area (e.g.: Switzerland), on the basis of the adequacy decisions of the European Commission or on the basis of the adequate guarantees provided for by current legislation. The Data will not be disseminated. Data that is manifestly not useful for the processing of a specific report are not collected or, if collected accidentally, are deleted immediately. In any case, the Data will be kept for a period not exceeding five years from the date of communication of the final outcome of the reporting procedure.

Each data subject is entitled to the rights provided for in Articles 15 et seq. GDPR and Articles 25 et seq. FADP. The rights referred to in the aforementioned articles may not be exercised if the exercise of these rights could result in a real and concrete prejudice to the confidentiality of the identity of the reporting person. The rights to revoke previously granted consent are reserved.

The Data Controller is Carlo Gavazzi Services AG with registered office at Sumpfstrasse 3, 6312 Steinhausen, Switzerland. To exercise the aforementioned rights, you can contact the Data Controller by writing to the following e-mail address: privacy@gavazziacbu.it or to the DPO of the Carlo Gavazzi Group by writing to the following e-mail address: dpo@gavazziacbu.it

The data subject also has the right to contact the Supervisory Authority for the protection of personal data in his or her country.