



**REPORT FORM**  
**GENDER-BASED VIOLENCE IN THE WORKPLACE**

*Please attach any documentation you think may be useful to corroborate the report*

**INFORMATION REGARDING THE REPORTING PARTY**

Name and Surname (optional)\*

Preferred contact channels, e.g., private email address, telephone number, etc. (optional)

**SUBJECT OF THE REPORT**

Period/date of the events

Operative area of the company to which the events are related

**PERSONS INVOLVED:**

Internal

External





Description of the events being reported

Evidence, if any

Any other persons who may provide information on the subject of the report:

Internal

External

Have the events been reported to anyone else?    Yes    No

Specify who and when





I hereby declare that I have read the Report Privacy Notice PdR125 and hereby consent to the processing of my data.

Date

Signature (optional)

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## **POLICY REGARDING THE PROCESSING OF PERSONAL DATA pursuant to articles 13 and 14 of Regulation (EU) 2016/679 RELATED TO THE REPORTING OF GENDER-BASED VIOLENCE AND HARASSMENT**

The company **Allegrini S.p.A.**, in compliance with the obligations provided for in articles 13 and 14 of Regulation (EU) 2016/679, in its role as Data Controller, represented by its pro-tempore Legal Representative, hereby provides information on the purposes, methods, scope of communication and dissemination, and nature of the personal data provided by persons reporting unlawful conduct of which they have become aware as a result of their employment, service or supply relationship with **Allegrini S.p.A.**

### **1. Purpose and methods of data processing**

The data directly provided by you in reporting, in the interests of the integrity of the Company **Allegrini S.p.A.**, alleged unlawful conduct of which you have become aware as a result of your employment, service or supply relationship with **Allegrini S.p.A.**, will be processed for the purpose of managing said situations. Said personal data are therefore acquired insofar as they are contained in the report and/or in deeds and documents annexed to the same, they refer to the reporting party and may also refer to persons indicated as allegedly responsible for the unlawful conduct, as well as to persons related in various ways to the reported events. In particular, in order to carry out the necessary enquiries aimed at verifying the veracity of the events reported, as well as, if necessary, to take appropriate corrective measures and appropriate disciplinary and/or judicial action against those responsible for the unlawful conduct.

### **2. Type of data processed**

In the case of reports made via the IT platform, the input of personal data is optional. If you choose to provide personal data, these will regard your name, surname, telephone number, email address and whether you are a company employee.

The personal data subject to processing thus fall into the following categories:

#### **Personal data of the reporting party in the case of reports made non-anonymously via the dedicated platform:**

- Common and optional: first name, surname

In the case of reports made in non-anonymous form through channels other than the platform, the personal data processed are those voluntarily communicated by the reporting party.

The receipt and management of reports therefore results in the processing of personal data considered as “common” (name, surname, working position, etc.), and may also give rise, depending on the content of the reports and the deeds and documents annexed to the same, to the processing of personal data considered as “sensitive” (data relating to health conditions, sexual orientation or trade union membership, as referred to in article 9 of the GDPR) and personal data relating to criminal convictions and offences (as referred to in article 10 of the GDPR).

#### **Personal data relating to the reported person(s) and/or other persons involved in the report**

The data that can be processed are those that the reporter has provided with the purpose of representing the facts described in the report. In this case, the Company is not in a position to determine in advance the data to be reported, which may therefore also include sensitive data or data relating to criminal convictions and offences.

### **3. Legal basis for data processing**

The legal basis for processing consists in the legitimate interest of the Data Controller to counter unlawful conduct or irregularities, breaches of regulations, or actions likely to cause harm to the company's finances or image, and to adopt a reporting system in line with the provisions of the regulations set forth in Italian Law 179/2017, to ascertain the veracity of the report and to take all action necessary for the management of the same and the adoption of the consequent measures.

The legal basis for processing also lies in the need to comply with legal obligations to which the Data Controller is subject (see in particular Italian Legislative Decree no. 231/2001 and Italian Legislative Decree no. 24/2023 implementing Directive (EU) 2019/1937, whistleblowing), as well as any need to ascertain, exercise or defend a right in court.





The processing of “sensitive” data is based on the fulfilment of obligations and the exercising of specific rights of the Data Controller and the Data Subject in the field of labour law (art. 9, paragraph 2, letter b), GDPR). The provision of data is optional, it being understood that any refusal to answer at the moment the information is collected, or any refusal to grant permission for data processing may make it objectively impossible for the report to be taken into consideration.

It is stressed that, in accordance with the provisions of Italian Legislative Decree no. 24/2023, in the event that the report leads to the initiation of disciplinary proceedings against the person responsible for the unlawful conduct, the identity of the reporting party will never be disclosed. If knowledge of the whistleblower's identity is essential for the accused's defence, the whistleblower shall be asked whether they wish to give their express and free consent to the disclosure of their identity.

#### **4. Nature of provision of data and consequences of failure to provide data**

In order to classify the report as gender-based violence and/or harassment, your identification data (name, surname - email address) must be provided. In the event that the reporting party wishes to make an anonymous report, said report will only be taken into account if it is adequately substantiated, provided in full detail and therefore capable of bringing forth facts and situations relating them to specific contexts. It is down to each reporter to decide which further personal data to provide. The more detailed the report, the greater the possibility for **Allegrini S.p.A.** to intervene in the interests of company integrity.

#### **5. Methods of processing personal Data**

The personal data will also be processed by automated means for the time strictly necessary to fulfil the objectives for which they were collected. **Allegrini S.p.A.** implements appropriate measures to ensure that the data provided are processed appropriately and in accordance with the purposes for which they are managed. **Allegrini S.p.A.** employs appropriate security (file encryption), organisational, technical and physical measures to protect information from alteration, destruction, loss, theft or improper or unlawful use.

#### **6. Subjects to whom data may be disclosed or who may become aware of said data.**

For your protection, only appointed staff within **Allegrini S.p.A.** are able to associate the reports with the identities of the persons making said reports.

If, for the purposes of enquiries, it is necessary that other persons within **Allegrini S.p.A.** be made aware of the content of the report or of the documentation attached to the same, the identity of the reporting party will never be disclosed, nor will any elements be revealed that may, even indirectly, allow said person to be identified.

These persons, since they may in any case learn of other personal data, are all formally authorised to process said data and are specially instructed and trained to do so, and are also required to uphold the confidential nature of any information they become aware of in the course of their duties, without prejudice to the reporting and disclosure obligations pursuant to art. 331 of the Italian Code of Criminal Procedure.

#### **7. Categories of recipients of personal data**

Your personal data and those of the persons indicated as allegedly responsible for the unlawful conduct, as well as of persons involved in various ways in the reported events, will not be disseminated. In the context of any criminal proceedings that may be instituted, the identity of the reporting party will be kept confidential in the manner and within the limits provided for in article 329 of the Italian Code of Criminal Procedure; in disciplinary proceedings, the identity of the reporting party will not be disclosed in any cases in which the allegation of disciplinary fault is based on enquiries that are separate from and additional to the report, even if consequent to it, whereas said identity may be disclosed in the event that three conditions are met, namely (a) that the charge is based, in whole or in part, on the report, (b) that knowledge of the reporter's identity is indispensable for the accused person's defence, and (c) that the reporting party has given specific consent to the disclosure of their identity.

#### **8. Duration of storage of data**

The internal office in charge of handling reports will carry out a preliminary investigation of the report. If, as a result of its activities, it finds elements of manifest groundlessness, it will order the dismissal of the report. If, on the other hand, it finds that the report is founded, it forwards it, without the data of the reporting party, to the internal or external bodies in charge, each according to its relative competence. Personal data are retained for a





period of 5 years and, in any case, until the proceedings initiated by the offices or bodies to which the report is addressed are defined.

**9. Personal data will not be disclosed.**

**10. The data controller is:** **ALLEGRINI S.p.A.**

Vicolo salvo d'Acquisto, 2-Grassobbio (BG)  
Tax Code / VAT no. 00216360164

11. The Data Protection Officer (DPO) is **Sabrina Russo**.

## **12. Rights of data subjects**

You have the right, at any time, to obtain confirmation of the existence or non-existence of the data provided. You also have the right to request, in the forms provided for by law, the rectification of inaccurate personal data and the integration of incomplete data, and to exercise any other right pursuant to articles 18 to 22 of the Regulation where applicable. If you have granted consent to the disclosure of your identity in the context of disciplinary proceedings, you have the right to revoke said consent at any time, but without prejudice to the lawfulness of processing, based on your consent, carried out prior to revocation.

These rights may be exercised by request addressed to:

**ALLEGRINI S.P.A.** Privacy Office - [privacy@allegrini.com](mailto:privacy@allegrini.com)

If you feel that processing has been carried out in a manner that does not comply with the Regulation and Italian Legislative Decree 196/2003, you may contact the Data Protection Authority pursuant to Article 77 of said Regulation. Further information on your data protection rights can be found on the website of the Italian Data Protection Authority at [www.garanteprivacy.it](http://www.garanteprivacy.it)

