

SANLORENZO

PRIVACY POLICY

concerning the processing of personal data of subjects who submit reports through My Whistleblowing

PRIVACY POLICY

Pursuant to art. 13 of Italian Legislative Decree no. 196/2003 of the Code on the protection of personal data (hereinafter, also, the "Privacy Code") and pursuant to art. 13 of European Regulation no. 679/2016 (hereinafter, also, the "GDPR"), we are providing you with this information.

DATA CONTROLLER.

The Data Controller is Sanlorenzo S.p.A., with headquarters in Via Armezzone no.3, 19031 Ameglia (SP), (Italy), email: superyacht@sanlorenzoyacht.com.

PLACE OF DATA PROCESSING.

The related processing takes place in Italy and there is no transfer or dissemination abroad or in non-EU countries. No data are communicated or disseminated, except for statistical purposes and in any case anonymously and/or in aggregate form.

PURPOSES OF DATA PROCESSING.

The personal data you provide is used for the sole purpose of managing the Whistleblowing report you have made.

DATA PROCESSED.

The personal data processed are exclusively:

- Name
- Surname
- Email address.

LEGAL BASIS FOR DATA PROCESSING

The legal basis for the processing of personal data is given by the legal obligation deriving from the provisions of art. 6 of Italian Legislative Decree no. 231 of 2001, as amended by Law no. 179 of 2017, containing "Provisions for the protection of whistleblowers who report crimes or misconduct of which they become aware in the context of private or public employment".

RETENTION TIME

The personal data you provide will be deleted within 5 years of their collection.

WHO WE SHARE THE COLLECTED DATA WITH

Your personal data may be accessed by employees in charge of investigating Whistleblowing reports and members of the Supervisory Board pursuant to Italian Legislative Decree 231/2001. In addition, given that Whistleblowing reports are forwarded through My Whistleblowing software, your personal data may also be accessed by the provider of the aforementioned application, appointed for this purpose as data controller pursuant to art. 28 of the GDPR. It is understood that, in line with the principle of protection of the whistleblower's privacy referred to in Law 179/2017, the sharing of your personal data will be limited to what is strictly necessary in order to guarantee your confidentiality.

PROCESSING METHODS.

Personal data are processed both with automated tools and with manual tools and for the purposes indicated above. Specific security measures are adopted to prevent loss of data, possible illegal or improper use of data, and unauthorised access.

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RIGHTS OF DATA SUBJECTS.

Under certain conditions, you have the right to exercise the rights provided for in Articles 7, 8, 9 and 10 of the Privacy Code and Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR and, in particular, to ask us:

- to access your personal data,
- a copy of the personal data you have provided us with (so-called portability),
- the rectification of personal data in our possession,
- the cancellation of any personal data for which we no longer have any legal basis for processing,
- opposition to processing where required by applicable law,
- revocation of your consent, if the processing is based on consent,
- limitation of the way in which we process your personal data, within the limits of the legislation on personal data protection.

The exercise of these rights is subject to certain exceptions aimed at safeguarding the public interest (e.g. the prevention or identification of crimes) and our interests (e.g. the maintenance of professional secrecy). In the event that you exercise any of the aforementioned rights, it will be our responsibility to verify that you are entitled to exercise it and we will respond to you, as a rule, within one month.

Anyone with questions regarding compliance with the privacy policy adopted by Sanlorenzo S.p.A., its application, the accuracy of the personal data or the use of the information collected can contact us by email at: superyacht@sanlorenzoyacht.com. However, if you wish, you may submit your complaints or reports, pursuant to Article 77 of the GDPR, to the data protection authority, using the relevant contact details:

Personal Data Protection Authority - Piazza di Monte Citorio n. 121 - 00186 ROME - Fax: (+39) 06.69677.3785 - Phone: (+39) 06.696771 - Email: garante@gpdp.it - Certified email: protocollo@pec.gpdp.it.

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