

# **Privacy Policy on the Processing of Personal Data pursuant to EU Reg. 2016/679 and Legislative Decree 24/2023 in case of Whistleblowing Reports**

Regarding the processing of the personal data provided, please be informed that:

## **1. Data Controller, Data Contact Person, and Data Protection Officer**

The Data Controller is OPERA UNIVERSITARIA DI TRENTO, P.I. 00453340226 with registered office in Trento (TN) via della Malpensada, 82/A, Certified Email (PEC) [operauniversitaria@pec.operauni.tn.it](mailto:operauniversitaria@pec.operauni.tn.it), email [direzione@operauni.tn.it](mailto:direzione@operauni.tn.it) (hereinafter, for brevity, "the Company"). The Data Protection Officer (DPO) can be reached at the email address [elisa.lagni@opilex.it](mailto:elisa.lagni@opilex.it). The person in charge of managing the report is the RPCT (Head of Anti-Corruption and Transparency), Gianni Voltolini, who can be reached at the following contacts: Tel. +39 3296605320, Via della Malpensada 82/A, 38123 Trento (TN).

## **2. Type of Data Processed, Purposes, and Legal Basis of the Processing**

Any personal data provided and acquired through the report will be processed exclusively for purposes related to its management, in compliance with the obligations arising from Legislative Decree 24/2023, and will be used and subsequently stored in both paper and digital formats. The legal basis for the processing is therefore the fulfillment of a legal obligation and the request of the reporting person.

## **3. Communication of Data to Third Parties - Data Recipients - Confidentiality**

The personal data that are the subject of the report will be processed exclusively by the person designated by the company for managing the reports, with a duty to guarantee confidentiality.

## **4. Transfer of Data to Third Countries**

The data processed are not transferred by the Data Controller to Third Countries. However, in the event of any data transfer to Third Countries, the transfer will take place in compliance with the regulations in force from time to time regarding data transfers to third countries and Articles 44 et seq. of Reg. 2016/679.

## **5. Processing Methods, Period, and Data Retention Criteria**

The data will be processed in paper format. The data will be processed for the period necessary for the execution of the aforementioned purpose(s) and for a

maximum period of 5 years from the date of communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations imposed by the law. At the end of this period, the data will be deleted.

## **6. Provision of Data**

The provision of data is optional. The failure to provide data will result in the report being managed anonymously. However, it is necessary to provide detailed information related to the report in order to allow the management of the dispute. The personal data and information you provide must be relevant to the purpose of the report, so that only reports concerning whistleblowing conduct provided for by law can be followed up.

## **7. Rights of the Data Subject, Withdrawal of Consent, and Complaint to the Supervisory Authority**

The data subject has the right at any time to request access to their personal data, their rectification, erasure, restriction, to object to the processing, and to exercise the right to data portability if the conditions are met. In any case, the data subject has the right to withdraw any consent given to data processing at any time, without affecting the lawfulness of the processing based on consent given before its withdrawal. In the event of a suspected violation, if the conditions are met, the data subject also has the right to lodge a complaint with a data processing supervisory authority located in the EU member state where they habitually reside or in the EU state where they work or where the violation occurred.

## **8. Profiling and Automated Decision-Making Processes**

The processing is not carried out by means of automated decision-making processes (e.g., profiling).

## **9. Contacts and Requests**

To find out the complete list of Privacy Contact Persons for processing appointed for each area and activity and of the Processors/to get more information regarding the transfer of data to non-EU countries, the mechanisms, and the safeguards for data transfer pursuant to Art. 44 et seq. of the GDPR/ to exercise the withdrawal of any consent given/ to exercise your rights (access, rectification, erasure, restriction, objection, portability), you may send a request **EXCLUSIVELY** to the **PERSON IN CHARGE OF MANAGING THE REPORT** indicated in point 1 of this policy. The reported person, on the other hand, can exercise the aforementioned rights exclusively by contacting the Italian Data Protection Authority at the following addresses: Piazza Venezia 11, 00187 – Rome, Italy; email: [protocollo@gpdp.it](mailto:protocollo@gpdp.it) ; phone: +39 06.696771.

