

WHISTLEBLOWING PRIVACY NOTICE

ex art. 13 and 14 of the European Regulation no. 679/2016 ("GDPR")

Categories of data subjects

- Whistleblower (reporting person) who will submit reports of misconduct; and
- Reported person.

The Code of Ethics of the Fondazione Bologna University Business School is published on the website of the Fondazione Bologna University Business School: <https://www.bbs.unibo.it/> in the section "CODE OF ETHICS" to which you can refer for any further reading.

Data Controller

"Fondazione Bologna University Business School" (hereinafter "**BBS**" or "**Data Controller**")

Villa Guastavillani, Via degli Scalini 18, Bologna (BO-Italy)

Entry in Reg. Legal Persons at the Prefecture of Bologna No. 729, p. 118 vol. 5. VAT No. 02095311201

Data Protection Officer

BBS has appointed its Data Protection Officer, who can be contacted at the following e-mail address: dpo@bbs.unibo.it

1. INFORMATION ON THE PROCESSING OPERATIONS PERFORMED

SECT. A

Purposes

Performing the necessary investigative activities and taking any measures, and more generally handling detailed reports of misconduct or violations of the Organization, Management and Control Model adopted pursuant to Legislative Decree No. 231/2001.

Legal base

- Fulfillment of legal obligations - Art. 6.1 c) GDPR (Art. 6 L. 231/2001, as amended by Law 179/2017, which requires the Data Controller to provide in the management model, if adopted, appropriate channels for submitting reports).
- Legitimate interest of the Data Controller in carrying out activities as a result of reports.

Personal data collected	Data retention period
Personal data, if any, included in the report. Optional provision.	The data shall be retained for a period of 2 months from the completion of the verification of the facts set forth in the report and its subsequent closure unless judicial or disciplinary action is initiated against the reported person or the whistleblower who has made false or defamatory statements. In this case, the Data will be retained for the duration of the proceedings, until their conclusion and the expiration of the time limits for the possibility of appeal actions.

SECT. B

Purposes

Ascertaining, exercising, or defending the rights of the Data Controller in court, or initiating disciplinary action against the reported person or the whistleblower who has made false or defamatory statements.

Legal base

Legitimate interest - Art. 6.1(f) GDPR.

Personal data collected	Data retention period
Personal data collected according to the above purposes.	The data used to ascertain, exercise, or defend the rights of the Data Controller in court or to initiate disciplinary action shall be retained for the period of time during which the corresponding actions (including appeals).

2. FOCUS: PURPOSES TO CARRY OUT THE NECESSARY INVESTIGATIVE ACTIVITIES AND TAKE ANY MEASURES, AND MORE GENERALLY TO HANDLE DETAILED REPORTS OF MISCONDUCT OR VIOLATIONS OF THE ORGANIZATION, MANAGEMENT AND CONTROL MODEL ADOPTED PURSUANT TO LEGISLATIVE DECREE NO. 231/2001 - - SECT. A

You may, as whistleblower, choose to submit the report through:

- the electronic platform on the BBS website <https://www.bbs.unibo.it/>, selecting "Whistleblowing" (hereinafter "Whistleblowing Platform"), or
- the email address odv@bbs.unibo.it, or also
- ordinary mail at the Fondazione's headquarters in Bologna - Via degli Scalini n. 18, to the kind attention of the Supervisory Board.

3. FOCUS: OPTIONAL PROVISION OF WHISTLEBLOWER'S DATA - SECT. A

Providing the data of the whistleblower is optional since the report can be transmitted anonymously to the Supervisory Board through the Whistleblowing Platform. The information highlighted on the Whistleblowing Platform with an asterisk (*) is mandatory and refusal to provide it will make it impossible to continue the reporting process through the platform.

4. PROCESSING METHOD

The processing of personal data is carried out by BBS using paper and computerized methods. The data will be processed using procedures, including computerized procedures, equipped with cryptographic tools or, in any case, in such a way as to ensure the confidentiality of the identity of the whistleblower and the content of the reports and related documentation, adopting appropriate technical and organizational measures to protect them from unauthorized or illegal access, destruction, loss of integrity and confidentiality, including accidental ones.

5. FATE OF DATA AT THE END OF THE RETENTION PERIOD

After the above retention periods have elapsed, the Data will be destroyed, erased, or anonymized, consistently with technical procedures for erasure and backup. Personal Data pertaining to reports found to be unfounded will be deleted without delay.

6. PERSONS AUTHORIZED TO PROCESS, DATA PROCESSORS AND OTHER DATA RECIPIENTS

The personal data collected are processed by the BBS Supervisory Board, which acts on the basis of specific instructions given regarding the purposes and methods of such processing.

Such personal data may be processed by BBS personnel, who act on the basis of specific instructions as to the purposes and methods of processing and who will in any case be involved only in cases that are strictly necessary, taking care to preserve the absolute confidentiality of the persons concerned.

If appropriate, the Judicial Authority, the *Corte dei Conti* [Court of Auditors] and ANAC [the Italian National Anticorruption Authority] and other public entities entitled to request them may be recipients of the data collected.

In exceptional cases, if a disciplinary proceeding is initiated against the reported person by BBS that is based solely on the report, the data of the whistleblower may be disclosed to the reported person, solely for the purpose of having the reported person exercise his or her right of defense, subject to consent.

Finally, personal data may be made accessible, brought to the attention of or communicated to natural or legal persons, which the Data Controller uses for the performance of activities instrumental to the achievement of the above purpose (by way of example, for accounting and administrative purposes, legal

BBS



defense, management, including IT-based management, of its archives). Among the aforementioned subjects designated as external data processors, we indicate herewith the Company Whistleblowing Solutions I.S. S.r.l., with registered office in Milan, Viale Aretusa 34, as well as the subjects who, each time, will carry out the activities indicated above.

7. DATA PROTECTION OFFICER

BBS appointed its Data Protection Officer, who can be contacted at the following address: dpo@bbs.unibo.it. You may contact the Data Protection Officer for all matters relating to the processing of your personal data and the exercise of your rights under European Regulation No. 679/2016.

8. PLACE OF PROCESSING

BBS carries out the processing of your data in Italy.

9. DATA SUBJECTS' RIGHTS

Data subjects have the right to obtain from BBS, in the cases provided for, access to their personal data and the rectification or erasure thereof or the restriction of processing concerning them. (Articles 15 et seq. of European Regulation No. 679/2016).

Pursuant to Article 2-undecies of Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018 ("Privacy Code"), the rights set forth in Articles 15-22 of European Regulation No. 679/2016 may not be exercised if their exercise may result in actual and concrete prejudice to the confidentiality of the identity of the employee reporting the misconduct, pursuant to Law No. 179/2017, of which he or she has become aware due to his or her position. In such a case, the aforementioned rights may be exercised in the manner set forth in Article 160 of the Privacy Code through the *Garante della Privacy* [Privacy Guarantor], who will inform the person concerned that all necessary verifications have been carried out or that a review has been conducted, and also of his or her right to seek judicial redress.

9.1 RIGHT TO OBJECT

Pursuant to Article 21 of the aforementioned Regulation No. 679/2016, each Data Subject also has the right to object at any time to the processing of his or her personal data carried out in pursuit of a legitimate interest of the Data Controller. In the event of opposition, your personal data will no longer be processed, provided that there are no legitimate grounds for processing that override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of a right in a court of law.

9.2 RIGHT TO LODGE A COMPLAINT

Data subjects who believe that the processing of personal data relating to them is taking place in violation of the provisions of the Regulation have the right to lodge a complaint with the *Autorità di Controllo* [Supervisory Authority], as provided for in Article 77 of the Regulation itself, or to take appropriate legal action (Article 79 of the Regulation).

9.3 METHODS FOR EXERCISING RIGHTS

The exercise of rights can be performed by sending a communication to the headquarters of the "Fondazione Bologna University Business School," Villa Guastavillani, Via degli Scalini 18, Bologna (BO-Italy) or to the e-mail address gdpr@bbs.unibo.it.

10. SOURCE OF THE PERSONAL DATA

The Whistleblower's Data possibly indicated are provided directly by the whistleblower himself/herself (and therefore acquired by the Data Controller from the person concerned pursuant to Art. 13 of the GDPR). Personal Data of the reported person and/or third parties were provided to the Data Controller by the whistleblower (and thus acquired by the Data Controller from the third party pursuant to Article 14 of the GDPR).