

**WHISTLEBLOWING PRIVACY POLICY
pursuant to Article 13, Regulation (EU) 2016/679 (GDPR)**

With this privacy policy, AVSI FOUNDATION wishes to provide information to all data subjects about which information it will collect in its relationship with whistleblowers to manage whistleblowing reports under the AVSI Whistleblowing Policy.

DATA CONTROLLER

FONDAZIONE AVSI ONLUS-ONG, with registered office at no. 216, Via Padre Vicinio da Sarsina, 47521 Cesena, tax reference number 81017180407 (the "Data Controller" or simply "AVSI"), represented by its *pro tem* legal representative – who can be contacted by email at: fondazione.avsi@avsi.org – acts as **Data Controller** for the data directly collected and processed completely independently. Pursuant to Articles 3 and 27 of Regulation (EU) no. 679/2016, the Data Controller has appointed CONSULENTI PRIVACY S.R.L. as DATA PROTECTION OFFICER (DPO). The DPO's registered office is at no. 11, Via Valentini, 47923 Rimini (RN), tax reference and VAT number 04391970409, Tel. 0541 1798723, Email info@iconsulentiprivacy.it, PEC certified email: consulentiprivacy@postaleg.it - DPO email address for AVSI FOUNDATION: dpo@avsi.org

INTRODUCTION

Pursuant to Italian law (Italian Legislative Decree 231/2001) companies and associations are required to introduce organizational, management and control models which must establish: one or more channels for reports of breaches of law, which protect the confidentiality of the whistleblower; an alternative reporting channel, which uses ICT systems to protect the identity of the whistleblower; that it is forbidden to commit retaliatory or discriminatory acts regarding reports; a disciplinary system that includes sanctions for breaches of protection measures, and for making malicious or seriously negligent unproven reports. Under its whistleblowing system, AVSI will collect and process data provided by employees, contract workers and third-party stakeholders, in line with the procedures adopted and set out in its Whistleblowing Policy.

This document provides information on the methods used to process the data collected and used under the AVSI Whistleblowing Policy. The AVSI Whistleblowing Policy can be found on the AVSI website at www.avsi.org .

LEGAL BASIS and PURPOSE

Data must be processed based on a legal ground, taking into account the purposes for which the personal data will be processed.

The following table contains a clear and concise description of the purposes and legal bases for processing carried out as part of an existing relationship with whistleblowing EMPLOYEES and THIRD PARTIES.

Ref:	Purpose of processing	Legal Basis Personal Data	Legal Basis Special Categories of Personal Data/Sensitive Data
1	Managing whistleblowing reports	processing is necessary for legal reasons (Article 6(1)(c))	processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law (Article 9(2)(g))

STORAGE PERIODS

Data will be stored for the period that is necessary for the purposes for which the data will be processed and, in particular, for a period no longer than 10 years where reports lead to investigations with a positive outcome.

REPORTS TO ANAC (ITALIAN NATIONAL ANTI-CORRUPTION AUTHORITY)

Please note that data subjects can also submit reports via an external channel made available by the Italian National Anti-Corruption Authority (ANAC). Reports can be made in writing, using the dedicated online platform (www.anticorruzione.it), or by phone, using dedicated phone lines or voicemail systems. Reports can be submitted in a direct meeting where requested by the Whistleblower.

TYPES OF DATA PROCESSED

You are requested not to enter information onto the report that is not relevant as indicated in AVSI's Whistleblowing Policy. In order for reports to be processed, we will collect Your personal data (name, surname, contact date) and the data contained in the report. Please note that you can make reports anonymously, however, they may contain information about an identified or identifiable individual.

CONSEQUENCES OF NOT PROVIDING PERSONAL DATA

You are not obliged in any way to provide us with your personal data.

We may also accept anonymous reports provided they are well substantiated, detailed, and contain facts regarding certain contexts.

However, to allow us to investigate and correctly manage a whistleblowing report, You must give us consent to collect the data to be processed as per the above table. If You refuse to give us this information, it may be impossible for us to correctly identify the acts or omissions reported.

RECIPIENTS AND OTHER ENTITIES TO WHOM DATA ARE COMMUNICATED.

Solely for the purposes indicated above, Your data may be transmitted to persons authorized to read Your reports under the provisions of the AVSI Whistleblowing Policy. These persons are authorized to process personal data. If external entities are engaged to provide, for example, storage systems and report collection systems, We will be responsible for appointing them as a Data Process pursuant to Article 28, GDPR. Finally, some information may be communicated to other entities, including, for example, law enforcement authorities and other public sector bodies for reasons of public interest and for legal purposes.

Any transfer of data to a non-EU country will only occur after adopting the guarantees set out in GDPR.

RIGHTS OF THE DATA SUBJECT

You have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed and, where that is the case, access to the personal data and the information indicated in Article 15, GDPR.

Also, You have the right to obtain the rectification, erasure and restriction of processing of Your personal data held by the Data Controller.

Finally, You have the right to lodge a complaint with the supervisory authority in the Member State in which You reside/work or the location in which the alleged breach occurred (for Italy, the competent supervisory authority is Garante - the Italian Data Protection Authority).

Please note that, under Article 2-undecies, Italian Legislative Decree 196/2003, the rights set out in Articles 15 to 22, GDPR, cannot be exercised with a request to the Data Controller or with a complaint pursuant to Article 77, GDPR, where exercising these rights may have an effective and tangible detrimental effect on, among other things, interests protected by anti-money laundering provisions.

This privacy policy was updated on 14/11/2023.