



UNIVERSITÀ DI PARMA

PRIVACY DISCLOSURE - WHISTLEBLOWING (WHISTLEBLOWING - Legislative Decree No. 24/2023) Information document pursuant to and in accordance with Article 13 Regulation (EU) 2016/679 (GDPR)





	1. DATA CONTROLLER AND CONTACTS The Data Controller is the University of Parma , located at Via Università 12, 43121 Parma (PR), Italy, in the person of its pro-tempore Legal Representative, who can be contacted for any information by: phone: +39 0521 902111, e-mail: protocollo@unipr.it , pec: protocollo@pec.unipr.it
	DATA PROTECTION OFFICER AND CONTACTS The University of Parma has appointed its data protection officer (DPO/DPO - Data Protection Officer) pursuant to Articles 37, 38 and 39 of the GDPR. The DPO can be reached at the Controller's office listed above and by e-mail by writing to: e-mail: dpo@unipr.it , pec: dpo@pec.unipr.it
	2. MAIN DEFINITIONS Please note that Article 4 of the GDPR provides the following definitions: - Personal data means any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, by reference in particular to an identifier such as a name, an identification number, location data, an online identifier, or to one or more features of his or her physical, physiological, genetic, mental, economic, cultural or social identity. The data processed will be those related to the reports made by reporting subjects (so-called Whistleblowers), which may include data related to third parties, i.e., reported subjects. Data related to whistleblowers, which may be provided by whistleblowers: - First name, last name; - Professional qualification; Other information provided by the whistleblower. The data subjects of this processing are: (i) employees of public administrations; (ii) employees of independent administrative authorities of guarantee, supervision or regulation; (iii) employees of public economic entities, private law entities subject to public control, in-house companies, public law bodies or public service concessionaires; (iv) employees of private sector entities; (v) self-employed workers; (vi) workers or collaborators who provide goods or services or perform works for third parties; (vii) freelancers and consultants; (viii) volunteers and trainees; (ix) shareholders and persons with administrative, management, control, supervisory or representative functions; (x) candidates for employment; and (xi) terminated workers.


3. PURPOSE OF PROCESSING, LEGAL BASIS, STORAGE PERIOD, NATURE OF CONFERMENT

	PURPOSE OF PROCESSING		LEGAL BASIS.		DATA RETENTION PERIOD		NATURE OF CONTRIBUTION
A)	Management of whistleblowing reports. At particular, data collection for sending reports via the platform of the University of Studies of Parma, reachable at https://unipr.whistleblowing.it , pursuant to Art. 3 of Legislative Decree No. 24/2023.		The treatment is necessary for fulfill a legal obligation (under of Legislative Decree No. 24/2023) to which the holder of the treatment (C45), Art. 6(1)(c), GDPR		For the time strictly necessary to the treatment of the signaling and, however, no more than 5 years from the date of Communication of the outcome final of the procedure of		he conferment of personal data of the reporter is necessary, still remaining the right to make a reporting in anonymous mode.



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 PURPOSE OF PROCESSING	 LEGAL BASIS.	 DATA RETENTION PERIOD	 NATURE OF CONTRIBUTION
		<p>reporting (Article 14 of Legislative Decree No. 24/2023).</p> <p>In the event that a lawsuit is instituted, the aforementioned time limit shall be extended until the exhaustion of the degrees of judgment. Personal data that are manifestly not useful for the processing of a specific report are not collected or, if accidentally collected, are deleted Immediately.</p>	
B)	Disclosure of the identity of the reporter and/or any other information from which such identity may be inferred, directly or indirectly, to persons other than those competent to receive and act upon the report, pursuant to Article 12, paragraph 2, of Legislative Decree No. 24/2023	Processing is based on the data subject's express consent to the processing of his or her personal data (C42, C43). Art. 6(1)(a) GDPR.	Until consent is revoked and unless the identity had already been disclosed to a third party
			Providing the reporter's personal data is optional. In the event of non-disclosure, the Holder may not disclose the identity of the reporter and/or any other information from which such identity may be inferred to persons other than those competent to receive and follow up on the reports, except for the situations expressly provided for by Legislative Decree No. 24/2023 and subject to written communication of the reasons of revelation

	<p>4. RECIPIENTS OF THE DATA</p> <p>Personal data will be communicated to parties who will process the data as autonomous Data Controllers or Data Processors (Art. 28 GDPR) and will be processed by individuals (Art. 29 GDPR and/or Art. 2-quaterdecies Legislative Decree No. 196/2003) acting under the authority of the Data Controller and Data Processors on the basis of specific instructions given regarding the purposes and methods of processing.</p> <p>Data will be disclosed to recipients in the following categories:</p> <ul style="list-style-type: none"> - The person or internal office or external party (including the Supervisory Board), to which
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	<p>Is entrusted with the management of the internal reporting channel;</p> <ul style="list-style-type: none"> - Whistleblowing Solutions Impresa Sociale S.r.l for the provision of the whistleblowing platform adopted by the Data Controller. The aforementioned person has been designated under Article 28 of the GDPR as the data controller; - Judicial authorities, Court of Auditors and public authorities (including ANAC). The data will not be disseminated. The list of Article 28 data processors is available by writing to protocollo@unipr.it or to the other contact details given above.
	<p>5. TRANSFER OF DATA TO COUNTRIES OUTSIDE SEE</p> <p>Personal data will not be transferred to countries outside the EEA. It should be noted, in particular, that the data will be stored in Italy and that the recipients of the data are based in Italy.</p> <p>For information about the guarantees inherent in the transfer of data outside the EEA, interested parties can write to .protocollo@unipr.it</p>
	<p>6. AUTOMATED PROCESSES</p> <p>Personal data will be subject to traditional manual, electronic and automated processing. It should be noted that fully automated decision-making processes are not carried out.</p>
	<p>7. RIGHTS OF INTERESTED PARTIES</p> <p>Data subjects may assert their rights as expressed in Art. 15 et seq. GDPR, by contacting the DPO/RPD at e-mail: dpo@unipr.it or by contacting the Data Controller at e-mail: protocollo@unipr.it, or by writing to the above contacts.</p> <p>The data controller guarantees data subjects the possibility of requesting, at any time, access to their personal data (art.15), rectification (art.16), deletion of the same (art.17), and restriction of processing (art.18). The data controller shall communicate (art. 19), to each of the recipients to whom the personal data have been transmitted, any rectification or erasure or restriction of processing carried out. The data controller shall communicate to data subjects who request such recipients. In the cases provided for by the GDPR (art.20), the controller guarantees the right to portability and, in the case of requests under art.20, the controller will provide data subjects with the data in a structured, commonly used and machine-readable format. In cases where the legal basis is consent, it has the right to revoke the consent given without affecting the lawfulness of the processing based on the consent before revocation. In the event that data subjects believe that the processing of personal data carried out by the Data Controller is in violation of the provisions of Regulation (EU) 2016/679, they are free to lodge a complaint with the Supervisory Authority, in particular in the Member State where they usually reside or work, or in the place where the alleged violation of the regulation occurred (Privacy Guarantor https://www.garanteprivacy.it/), or to take appropriate legal action.</p> <p>It should be noted that, pursuant to Legislative Decree No. 24/2023, the Data Controller is required to ensure the confidentiality of the reporter: the identity of the reporting person and any other information from which such identity may be inferred, directly or indirectly, will not be disclosed, without the express consent of the reporting person, to persons other than those competent to receive or follow up the report without prejudice to the right of defense of the reported person and where required by law. Please refer to the procedure Holder Whistleblowing available https://unipr.whistleblowing.it/</p>
	<p>8. INFORMATIONAL CHANGES</p> <p>The owner may change, modify, add or remove any part of this Privacy Policy. In order to facilitate verification of any changes, the notice will contain an indication of when the notice was updated.</p>

Update Date: **MAY 2025**

The Data Controller
University of Parma