



UNIVERSITÀ DI PARMA

PRIVACY DISCLOSURE - WHISTLEBLOWING (WHISTLEBLOWING - Legislative Decree No. 24/2023)
Information document in accordance with and for the purposes of Article 14 Regulation (EU) 2016/679 (GDPR)




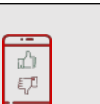
	1. DATA CONTROLLER AND CONTACTS The Data Controller is the University of Parma , located in via Università 12, 43121 Parma (PR), Italy, in the person of its pro-tempore Legal Representative, who can be contacted for any information by: phone: +39 0521 902111, e-mail: protocollo@unipr.it , pec: protocollo@pec.unipr.it
	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. TYPE OF DATA PROCESSED Personal data means any information concerning 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 characteristic elements of his or her physical, physiological, genetic, mental, economic, cultural or social identity; (C26, C27, C30). The data processed will be those related to reports made by whistleblowers, which may include data related to third parties, i.e., the reported individuals, and will be processed in full compliance with and in the manner defined in the Whistleblowing Procedure adopted by the Owner. Data about the reporter, which can be provided by the reporter: <ul style="list-style-type: none"> - First name, last name, or other information identifying the person to whom the reported facts can be attributed; - Business function; - Other personal information such as phone number, e-mail address, and social security number; - Other information disclosed by the reporter; - Any Special Data (see Art. 9 GDPR): personal data capable of revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health or sex life or sexual orientation; - Possible Data on Criminal Convictions and Offenses or Related Security Measures (see Article 10 GDPR): personal data capable of revealing measures referred to in Article 3, paragraph 1, letters (a) to (o) and (r) to (u), of the Presidential Decree No. 313 of November 14, 2002, on criminal records, registry of administrative penalties dependent on crime and related pending charges, or the status of defendant or suspect under Articles 60 and 61 of the Code of Criminal Procedure. Category of data subjects: The data subjects of this processing are: <ol style="list-style-type: none"> Reported person: the natural or legal person mentioned in the internal report as the person to whom the violation is attributed or as a person otherwise implicated in the reported violation (Article 2, paragraph 1(l) of Legislative Decree No. 24/2023); as well as persons in various capacities involved in the reported events: ii) Facilitator: the natural person who assists a reporting person in the reporting process, operating within the same work environment and whose assistance must be kept confidential; (iii) Person with knowledge of the facts.



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

	PURPOSE OF PROCESSING		LEGAL BASIS.	DATA RETENTION PERIOD SOURCE OF DATA.
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 PURPOSE OF PROCESSING	 LEGAL BASIS.	 DATA RETENTION PERIOD	 SOURCE OF DATA.
A) Management of whistleblowing reports. Specifically, use of your personal data collected as a result of the submission of reports against you regarding conduct, acts or omissions that harm the public interest or the integrity of the public administration or private entity, pursuant to Article 2, Paragraph 1 letter a) of Legislative Decree No. 24/2023.	The processing is necessary to fulfill a legal obligation (pursuant to Legislative Decree No. 24/2023) to which the holder is subject of treatment (C45). Art. 6(1)(c), GDPR. Art. 6(1)(c) GDPR. The processing of "special" data is based on the fulfillment of obligations and the exercise of specific rights of the Owner of treatment of the Data Subject in the field of labor law (Art. 9(2)(b) GDPR). The processing of data relating to criminal convictions and offenses, taking into account the provisions of Article 10 GDPR, is based on the legal obligation to which the Holder is subject of treatment (art. 6(1)(c))	For the time strictly necessary for the processing of the report and, in any case, no longer than 5 years from the date of Communication of the final outcome of the reporting procedure (Article 14 of Legislative Decree No. 24/2023). In the event that a lawsuit is instituted, the aforementioned time limit shall be extended until the exhaustion of the legal stages. Personal data that manifestly are not useful for the processing of a specific report are not collected or, if accidentally collected, are deleted immediately.	The source from which personal data originates è the report made by the reporting party (art. 3, paragraphs 3 and 4, of the Legislative Decree. No. 24/2023) and by other subjects during the investigation

	4. RECIPIENTS OF THE DATA 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. Data will be disclosed to recipients in the following categories: - anti-corruption manager, who is entrusted with the task of handling internal reports; - 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.
	5. TRANSFER OF DATA TO COUNTRIES OUTSIDE SEE Personal data will not be transferred to countries outside the EEA. In particular, it should be noted that the data will be stored in Italy and that the recipients of the data are based in Italy. For information about the safeguards inherent in the transfer of data outside the EEA, data subjects can write to .protocollo@unipr.it



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	6. AUTOMATED PROCESSES 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.
	7. RIGHTS OF INTERESTED PARTIES Interested parties may assert their rights as expressed in Art. 15 et seq. GDPR, by contacting the Responsible for the Prevention of Corruption and Transparency (RPCT) of the University of Parma at the e-mail address: responsabileanticorruzione@unipr.it by filling out the appropriate form . The interested party has the right, at any time, to request rectification (art. 16) and access to personal data (art. 15). These rights cannot be exercised if it may result in actual and concrete prejudice to the confidentiality of the identity of the person reporting violations of which he or she has become aware by reason of his or her employment relationship or duties performed, pursuant to Legislative Decree no. 24/2023 (art. 2-undecies Legislative Decree 196/2003, as amended by art. 24, paragraph 4, of Legislative Decree no. 24/2023). In the event that the data subject believes that the processing of personal data carried out by the Data Controller is in violation of the provisions of Regulation (EU) 2016/679, the data subject has the right to lodge a complaint with the Supervisory Authority, in particular in the member state where he or she usually resides or works or in the place where it is verified the alleged violation of the regulation (Garante Privacy https://www.garanteprivacy.it/), or to take appropriate legal action.
	8. INFORMATIONAL CHANGES 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 the date the notice was updated.

Update Date: **MAY 2025**

The Data Controller
University of Parma