

PRIVACY POLICY

The Company REFRION S.r.l., hereinafter also the “Company” or “REFRION”, in application of Regulation (EU) 2016/679 (General Data Protection Regulation - “GDPR”), Legislative Decree No. 196 of 30 June 2003 and Legislative Decree No. 51 of 18 May 2018, hereby provides you with the privacy policy concerning the processing of your personal data carried out while managing reports regulated by the “Report Procedure on the application of rules and of the Code of Ethics of the LU-VE Group”, hereinafter also the “Procedure”, and by the Company’s “Internal report assessment Process”, hereinafter also the “Process”.

Purposes and legal basis of processing

Your personal data are processed for purposes related to the application of the Procedure and the Process in order to comply with obligations imposed by national legislation, by regulations or by EU legislation in that regard.

The provision of data is mandatory for everything required by legal and contractual obligations and therefore any refusal to provide the data, in whole or in part, may make it impossible to manage the reports received.

Personal data retention period

The Company retains your personal data, in respect of the confidentiality requirements indicated above, for the time considered necessary for the processing of the Report and in any case no longer than five years from the date of the communication of the final outcome of the Report procedure, in compliance with the confidentiality requirements.

Personal data that are manifestly not useful for dealing with a specific report are not processed and, if collected accidentally, are erased immediately.

Data processing modalities

Each personal data processing activity must be carried out in accordance with Regulation (EU) 2016/679, Legislative Decree No. 196 of 30 June 2003 and Legislative Decree No. 51 of 18 May 2018.

Data processing is carried out manually (for example, on paper) and/or using automated means (for example, using electronic processes and/or media), with logics related to the purposes indicated above and, in any case, so as to ensure the security and confidentiality of the data. The report management system guarantees, at every step, the confidentiality of the content of the report (including information on any third parties included in the report) and the identity of the Whistleblower, the persons involved and the persons mentioned in the report and the facilitator, also by using encrypted communications.

Data Controller and DPO

The data controller is REFRION S.r.l., con sede in Vicolo Malvis, 1 - 33030 Talmasson – Frazione Flumignano (UD), and can be contacted at the email address: privacy.refrion@luvegroup.com

The Data Protection Officer is Unindustria Servizi & Formazione Treviso Pordenone S.c.a.r.l. and can be contacted at the email address: dpo.luve@luvegroup.com.

This privacy policy supplements the website browsing policy, with the aim of illustrating to Users how the controller processes, specifically, the data included in this contact form; please therefore read our privacy policy at the following link:

<https://exchangers.luvegroup.com/cms/view/home/privacy/s4/c1768>

Third parties who may come to know of the data as the Processors

Some processing of your personal data may be carried out by third parties. Those parties act as the Processors and are essentially included in the following categories:

- Consultants (Organisation, Litigation, Law Firms, etc.);
- External structures that collaborate directly with the Company in the technical and IT management of the Website and any other external figure to which the data must be communicated.

Transfer of data to a third country and/or international organisation

Your personal data will not be transferred to non-European third countries.

Right of access to personal data and other rights

The Whistleblower has the right to access at any time the data relating to you and to rectify them if inaccurate, to erase them or restrict their processing if the prerequisites are in place, or to object to their processing for legitimate interests pursued by the Company and/or by the LU-VE Group, as well as to obtain the portability of the data provided by you only if it is subject to automated processing based upon your consent or on the contract, at the following email address privacy.refrion@luvegroup.com. The Whistleblower also has the right to withdraw the consent given for the purposes of processing that require it, without prejudice to the lawfulness of the processing carried out until the withdrawal. The Whistleblower also has the right to lodge a complaint with the competent supervisory authority.