

Privacy policy concerning processing of the personal data of persons who file violation reports (“whistleblowers”) through the whistleblowing platform pursuant to Article 13 of EU Regulation No. 2016/679

This document was prepared pursuant to Article 13 of EU Regulation No. 2016/679 (hereinafter the “Regulation”) with the aim of disclosing to the users our privacy policy and understand how their personal data are processed when they file a violation report through the whistleblowing platform (<https://ewhistle.cerved.com>). The information and data supplied by users will be processed in accordance with the provisions of the Regulation and the corresponding confidentiality obligations.

1. Data Controller (“Controller”) and Data Protection Officer (“DPO”)

The parties who will process the data in the capacity as independent Controller of the data processing are listed below:

COMPANY	Registered Office
• Cerved Group S.p.A. • Cerved Rating Agency S.p.A. • Cerved Credit Management Group S.r.l. • Cerved Master Services S.p.A. • Cerved Credit Management S.p.A. • Cerved Legal Services S.r.l. • Cerved Credit Collection S.p.A. • Juliet Holding S.p.A. • ProWeb Consulting S.r.l. • Cerved FinLine S.r.l.	via dell’Unione Europea n. 6/A-6/B, San Donato Milanese (MI)
Credit Management S.r.l.	Vico San Domenico n. 2, Bari
SC RE Collection S.r.l.	Str. Henri Barbusse, 44-46 Cluj-Napoca (Romania)
ClickAdv S.r.l.	Via Antiniana 2/A, Pozzuoli (NA)
Major1 S.r.l.	Via Sforzesca, 10/G Novara
Juliet S.p.A.	Via Aldo Moro 13/15, Siena
Spazio Dati S.r.l	Via Adriano Olivetti n.13, Trento
MBS Consulting S.p.A.	Piazza Diaz 6, Milano
MBS Consulting S.r.l.	
Innovation Team S.r.l.	
Cerved Property Services Single Member SA	7, Eslin & 20, Amaliados Str. 115 23 - Atene
Cerved Property Services SA	169A Calea Floreasca, building B, 7th floor, 1st District - Bucharest

(hereinafter, individually the “Controller” and jointly the “Controllers”).

The Data Protection Officer (“DPO”) established pursuant to Article 33 *et seq.* of the Regulation can be reached at the address listed in the “Contacts” section of this disclosure.

2. Personal data subject to processing

The use of the platform will entail the processing of personal data, namely non-sensitive data (by way of a mere non-exhaustive example: data that identify the whistleblower).

Please keep in mind that including data belonging to special categories¹ in the descriptive section of the violation report is strictly forbidden. Consequently, such data will be disregarded both during the preliminary phase and in the investigative activity regarding any violation report.

3. Purpose of the data processing

Personal data are processed for the purpose of managing violation reports in accordance with the legal requirements of Law No. 179/14, setting forth *“Provisions to protect the authors of reports of crimes or improprieties of which they became aware in the course of an employment relationship in either the public or private sphere.”*

In addition, in the whistleblowing area, Cerved Credit Management SpA, Cerved Master Services SpA, Cerved Credit Collection SpA, Cerved Legal Services Srl, Credit Management Srl, Juliet SpA and Sc Re Collection Srl are subject to the requirements of Legislative Decree No. 90 of May 25, 2017 *“Implementation of (EU) Directive No. 2015/849, which concerns preventing the use of the financial system to launder proceeds of criminal activities and finance terrorism, amending Directives No. 2005/60/EC and No. 2006/70/EC and implementing (EU) Regulation No. 2015/847, which concerns the information data that accompany wire transfers of funds and repeals (EU) Regulation No. 1781/2006.”*

In the whistleblowing area, Cerved Master Services is also subject to Article 10, Sections 1, 2 and 3, of Legislative Decree No. 385 of September 1, 1992 (Uniform Bank Law).

Lastly, in the whistleblowing area, Cerved Rating Agency is also subject to the provisions of Regulation No. 1060/2009 of the European Parliament and Council, of September 16, 2009, applicable to rating agencies.

4. Data processing modalities

In accordance with the provisions of the Regulation, data processing activities shall be carried out consistent with the principles of lawfulness, fairness, transparency, limitation in purpose and length of retention, minimization of data, accuracy, integrity and confidentiality, as well as the principle of assumption of responsibility stated in Article 5 of the Regulation.

Special security measures shall be adopted to prevent the illegal or improper use of data and unauthorized accesses. More specifically:

- all processed data shall be encrypted (personal data of whistleblowers, violation reports) with different encryption keys for each table;
- the data of the whistleblower shall be stored in a table separate from the content of the violation report filed by the whistleblower;
- each violation report shall be assigned an “anonymous” identification code. In this way, throughout the entire violation report management process and even after a report has been closed, the whistleblower’s personal data will be accessible only by specially authorized personnel, exclusively for the purpose of allowing verifications of the violation report and in full compliance with existing relevant laws.

5. Legal basis for data processing and mandatory or optional type of data processing

The legal basis for the processing of personal data for the purposes stated in Section 3 is Article 6.1.f) of the Regulation, as the processing of the data is based on the legitimate interest of each Owner.

¹ The expression “special data categories” shall be understood to mean personal data that reveal racial or ethnic origin, political opinion, religious or philosophical beliefs, union membership, genetic data, biometric data that can be used to univocally identify an individual, and data concerning a person’s health, sexual lifestyle or sexual orientation.

The conveyance of personal data for these purposes is indeed necessary, as a failure to provide those data would make it impossible to pursue submitted violation reports.

6. Recipients of personal data

The personal data thus gathered may be shared, for the purposes of Section 3 of this Disclosure, with:

- (i) parties who typically operate as data processors, pursuant to Article 28 of the Regulation, or parties who cooperate with one of the Controllers in pursuit of the abovementioned objectives, including parties to whom the performance of technical maintenance has been delegated;
- (ii) individuals, entities or authorities to whom personal data must mandatorily be communicated pursuant to existing laws or the order of authorities;
- (iii) people authorized by a Controller who, pursuant to Article 29 of the Regulation, has jurisdiction over the processing of personal data needed to perform activities closely related to the delivery of services and have undertaken to be bound by confidentiality and are otherwise bound by a legal confidentiality obligation.

7. Transferring of personal data

Personal data cannot be transferred outside the European Union.

8. Storage of personal data

Personal data processed for the purposes stated in Section 3 shall be stored for the time strictly necessary to achieve the abovementioned purposes. In any event, as the data are being processed for the supply of services, the Controllers shall retain the personal data for the length of time stipulated and allowed under Italian law for the protection of personal interest (Article 2220 of the Civil Code *et seq.*).

More detailed information about the data storage length of time and the criteria applied to determine it may be requested by sending a written request to the Controller who was the recipient of the Violation Report at the address shown in the “*Contacts*” section of this disclosure.

9. Rights of the interested parties

Pursuant to Article 15 *et Seq.* of the Regulation, the interested parties have a right to ask the Owner who was the recipient of the violation report to give them access to their personal data, revise or delete those data or oppose their processing and ask that the type of processing be limited, in the cases listed in Article 18 of the Regulation, and obtain their data in a structured, commonly used format, legible by an automated device, in the cases listed in Article 20 of the Regulation.

These requested shall be sent in writing to the Controller or the DPO at the addresses shown in the “*Contacts*” section of this disclosure.

10. Contacts

Anyone who wishes to exercise the rights mentioned above or for any other request may write to the Controller of the data processing activity who was the recipient of the violation report at the physical address listed above or through the following dedicated contacts:

COMPANY	Contacts
• Cerved Group S.p.A. • Cerved Rating Agency S.p.A.	cerved@cerved.com

COMPANY	Contacts
• Cerved FinLine Srl • Cerved Master Services S.p.A. • Juliet Holding S.p.A. • Juliet S.p.A.	
Cerved Credit Management Group S.r.l.	privacy_CCMG@cerved.com
Cerved Credit Management S.p.A.	privacy_CCM@cerved.com
Cerved Legal Services S.r.l.	privacy_CLS@cerved.com
Cerved Credit Collection S.p.A.	privacy.CCC@cerved.com
Credit Management S.r.l.	privacy_CM@cerved.com
SC RE Collection S.r.l.	dpo@recollection.ro
ClickAdv S.r.l.	privacy@clickadv.it
Major1 S.r.l.	major1@major1.com
Spazio Dati S.r.l.	privacy@spaziodati.eu
ProWeb Consulting Srl	privacy@prowebconsulting.net
MBS Consulting S.p.A.	privacy@mbsconsulting.it
MBS Consulting Srl	
Innovation Team Srl	privacy@innovationteam.eu
Cerved Property Services Single Member SA	CPS.DataControler.GR@cerved.com
Cerved Property Services SA	info.cps.ro@cerved.com

and, to contact the DPO directly, preferably entering in the communication subject line the wording “*Request to exercise privacy rights*,” the following contacts may be used:

COMPANY	Contacts
• Cerved Group S.p.A. • Cerved Rating Agency S.p.A. • Cerved Master Services S.p.A. • Juliet Holding S.p.A. • Juliet S.p.A. • Cerved Credit Management Group S.r.l. • Cerved Credit Management S.p.A. • Cerved Legal Services S.r.l. • Cerved Credit Collection S.p.A. • Credit Management S.r.l. • ClickAdv S.r.l. • Major1 S.r.l. • ProWeb Consulting S.r.l. • Cerved FinLine S.r.l. • MBS Consulting S.p.A. • MBS Consulting S.r.l. • Innovation Team S.r.l.	dpo@cerved.com
SC RE Collection S.r.l.	dpo@recollection.ro
Spazio Dati S.r.l.	dpo@spaziodati.eu
Cerved Property Services Single Member SA	cps.dpo.gr@cerved.com
Cerved Property Services SA	dpo.cps.ro@cerved.com.