Bocconi

PRIVACY POLICY

ON THE PROCESSING OF PERSONAL DATA REPORTING WRONGDOING (“WHISTLEBLOWING”)

We would like to inform you that your personal data will be processed in compliance with the legislation on the protection of personal data (Regulation (EU) 2016/679, "GDPR"), and D. Legislative Decree 196/2003 and ss.mm.ii. ("Privacy Code").

1. Data controller

The Data Controller is **Università Commerciale "Luigi Bocconi**", with registered office in Via Sarfatti n. 25, 20100 Milano (MI).

2. Data Protection Officer

The University has designated a *Data Protection Officer* ("**DPO**") who can be reached at dpo@unibocconi.it.

3. Processing of personal data

Purpose of processing	**Legal basis**	**Category of data processed**	**Conservation period**
A. Carrying out the necessary preliminary investigations to verify the validity of the report and, where appropriate, adopting adequate corrective measures and taking the necessary disciplinary and/or legal action against those responsible for the unlawful conduct.	• Fulfilment of a legal obligation, Art. 6, par. 1, lett. c) GDPR and Art. 9, par. 2 lett. b) GDPR. • Performance of a task carried out in the public interest (Art. 9(1)(g) and Art. 6(1)(e) GDPR)	• personal details (name, surname; email address; username, role, and company position) • as well as, depending on the content of the reports, the documents and files attached to them, other categories of data: "special categories" of data (relating to health conditions, sexual orientation, or trade union membership, pursuant to Article 9 of the GDPR) and data relating to criminal convictions and/or offenses (Article 10 of the GDPR).	The personal data collected will be stored for the period that is strictly necessary to ascertain the validity of the report and, if due, to take the appropriate measures, in accordance with the provisions of the relevant legislation and the Policy and, in any case, for a period not exceeding 5 years from the date of notification of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set out in Legislative Decree No. 24/2023 and the principles relating to the processing of personal data.
B. Management of any disputes, in the	• Establishing, exercising, or	• personal details (name, surname, e-	10 years from the date on which the

Purpose of processing	Legal basis	Category of data processed	Conservation period
interests of the integrity of the University	defending legal claims (Article 9(2)(f) GDPR)	mail address) • any special categories of data and judicial data	judgment settling the dispute becomes final.

4. Methods of data processing

The University has adopted a reporting channel that - implemented with all appropriate security measures, including cryptographic ones - guarantees the confidentiality of the identity of the reporter, of the person possibly involved and of the reported person, as well as of the content of the report and of the related documentation, as analytically documented in the impact assessment, pursuant to Article 35 of the GDPR.

5. Recipients of personal data

For the pursuit of the above-mentioned purposes, the personal data collected may be communicated to

a) authorised personnel, pursuant to Article 29 of the GDPR and Article *2-quaterdecies* of the Privacy Code.

The management of the reporting channel is entrusted to a collegial body (hereinafter referred to as the '**Pool**') of staff trained in the investigation and handling of reports.

The Pool is composed of three Staff members appointed by the Chief Executive Officer from the Institutional Affairs and Compliance Governance Department, the Legal Affairs Department and the People and Culture Department, and one Faculty member appointed by the Rector from among the members of the Rector‘s Committee as full members and two Staff members appointed by the Chief Executive Officer as alternate members.

In the event that investigative requirements require that other persons within the University should be made aware of the content of the report or of the documents annexed thereto, the identity of the person making the report shall not be disclosed, nor shall elements be revealed which might, even indirectly, allow the identification of the person making the report, unless the person making the report authorises the disclosure of his/her identity or unless anonymity cannot be enforced for reasons of judicial investigation and/or disciplinary proceedings.

b) third companies appointed as data processors, pursuant to Article 28 of the GDPR. In detail:

- DigitalPA s.r.l., with registered office in Via Tommaso D'Aquino 18/A, 09134 Cagliari.
- Aruba s.p.a. (Sub-responsible), via San Clemente, 53 - 24036 Ponte San Pietro (BG).

c) The data may also be communicated to subjects, bodies, organisations or authorities to whom it is compulsory to communicate your personal data by virtue of legal provisions or orders by the authorities.

Your personal data will in no way be the subject of communication and dissemination outside the above-mentioned cases, nor of transfer to a third country outside Europe, nor of automated decision-making processes including profiling.

6. Data transfer outside the EU

Personal data will be processed in Italy on servers located there. Your personal data are therefore not transferred outside the European Union.

In the event that it becomes necessary to transfer personal data outside the European Union or to international organisations, the Data Controller nevertheless informs you that the processing will take place according to one of the methods permitted by current law, in compliance with the provisions of Articles 44-49 of the GDPR.

In any event, you can always obtain further details from the Controller by requesting evidence of the specific guarantees adopted from the contacts listed above.

7. The rights of the data subject

You have the right to access your data at any time, pursuant to Articles 15-22 of the Regulation. In particular, as a data subject you have the right to:

a. obtain confirmation of the existence or otherwise of the data provided;
b. request, in the forms provided for by law, the rectification of inaccurate personal data and the integration of incomplete data;
c. exercise any other rights under Articles 18 to 22 of the GDPR, where applicable.

It should be noted that the right of access, as set out in Article 15 of the GDPR, does not apply with regard to the identity of the whistleblower; the identity of the whistleblower may only be disclosed with express consent or if knowledge is indispensable for the whistleblower's defence or anonymity cannot be opposed for reasons of judicial investigation and/or disciplinary proceedings.

Similarly, revocation of consent does not apply when the reporting person has given it for the purpose of revealing his identity, even to persons other than those competent to receive or follow up the report.

In order to exercise all the above-mentioned rights, the data subject may use the dedicated Privacy Web Form available here (or by scanning the QR code below), or contact the Data Controller or the DPO in writing at the contact details indicated above.

Privacy Web Form

If you consider that the processing of your personal data violates the applicable data protection regulations, you also have the right to lodge a complaint (Art. 77 GDPR) with the Garante Privacy (www.garanteprivacy.it).

□ I declare that I have read and understood this privacy policy on the processing of my personal data