



▼ Whistleblowing Privacy Policy

The Data Controller is the Grand Hotel Villa Serbelloni | Via Teresio Olivelli, 1, 22021 Bellagio CO | info@villaserbelloni.com



▼ Purpose [F] and Legal Bases [B] of the Processing

1. [F] Receive the whistleblowing report and evaluate prosecutability in accordance with the law.
[B] Necessary for compliance with a legal obligation to which the Controller is subject
2. [F] Follow-up on the report through investigations and Authority's requested
[B] Necessary for compliance with a legal obligation to which the Controller is subject
3. [F] Initiate registration when used the tool of collecting the Report by voice on the platform or by meeting with the Controller.
[B] Data subject's consent
4. [F] Disclose the identity of the Whistleblower to authorized third parties who are engaged in investigations in connection with the Report and who need to know the identity of the Reporting party for investigative purposes.
[B] Data subject's consent
5. [F] Disclose the identity of the Whistleblower to the reported party within the framework of disciplinary proceedings when this is essential to the defense of the person to whom the disciplinary charge has been brought or the person otherwise involved in the report.
[B] Data subject's consent
6. [F] To establish, exercise or defend a right in court (applicable to common and special data);
[B] Legitimate interest of the proprietor
7. [F] Perform a contract to which the Data Subject is a party in connection with any disciplinary proceedings resulting from the Reporting
[B] Controller's Legitimate interest



▼ Legitimate interests pursued by the Controller

The Controller may use its legitimate interest as the legal basis for a specific purpose by balancing its rights with those of the data subject, taking into account the data subject's 'reasonable expectations' in view also of its relationship with the Controller. When the processing is based on the legitimate interest of the data controller, it is not necessary seeking the data subject's consent for that specific purpose. The processing must not adversely affect the rights and freedoms of the Data subject.



▼ Recipients (by categories)

- **Authorized processors** duly instructed and required to maintain confidentiality.
- **Processors: service providers to whom the data** may be transmitted and who process the data on behalf of the Controller on the basis of a legally binding agreement which guarantees the protection of personal data.
- **Autonomous data controllers** with sufficient guarantees to process data subjects' data and with a valid legal basis for doing so (e.g. supervisory and control authorities and bodies, public or private entities that have right to request data, such as partners or suppliers).



▼ Transfers to third countries ex Articles 46, 47, 49 GDPR

Transfers to third countries will take place in accordance with current legislation:

- in countries recognised as safe by the EU Commission
- in countries with which Europe has international Data Protection Agreements
- with entities with which the Data Controller has entered into legally binding agreements capable adequate safeguards for the protection of the Data Subjects as required by law.
- Where there are exceptions provided for:
 - Data subject's consent
 - by necessity and not repetitive basis for types and amounts of data that allow it.



▼ Criteria for determining the data retention period








The Controller applies the principle of data minimization for all processing.

The retention period will be determined in compliance with the data retention provided in the regulatory guidance on Whistleblowing.



▼ Rights of data subject

- To obtain confirmation or not about on going processing and eventually, obtain access to the data concerning the data subject
- To know the origin of the data processed by the Controller

 	<ul style="list-style-type: none"> • To verify the accuracy of the data concerning the data subject • To oppose, for legitimate reasons, the processing • To ask for possible integration, cancellation, updating, rectification, blocking of personal data processed in violation of the law, portability <p>Requests can be addressed to the Data Controller via the contact details in the header or to the Data Protection Officer at the following contact details: rpd.villaserbelloni@consolleprivacy.it</p> <p>Communications with the data protection officer are confidential.</p> <p>Interested parties also have the right to</p> <ul style="list-style-type: none"> • Be informed about violations that may present a high risk for the Data subjects themselves • To lodge a complaint with the competent supervisory authority in the Member State where they usually reside or work or in the State where the alleged breach occurred.
	<p>▼ Consent</p> <hr/> <p>The free, optional and revocable consent, of the Data subject, when required, is collected for the processing of data for specific types of data or purposes.</p>
	<p>▼ Categories of personal data involved</p> <hr/> <p>For some Controller's activities the personal information collected involves common data (could include name, address, email address, place and date of birth, job title) and sometimes to data belonging to special categories under Article 9 of the GDPR (only when there is an appropriate legal basis, such as when the Controller needs to exercise labor and social security law rights or the data subject has given consent).</p>
	<p>▼ Source from which personal data originated</p> <hr/> <p>Personal data are generally collected from the data subject but, in some cases, may come from third parties who provide them to the Controller on a legitimate legal basis (e.g. reporting persons).</p>
	<p>▼ Additional purposes</p> <hr/> <p>Where the Data controller intends to further process personal data for a purpose other than that for which it was collected, the Data Controller shall, prior to such further processing, provide the Data subject with information about that different purpose and any additional information relevant to the new purpose. Such disclosures may take place by updating the Information Notice and/or by contacting the person concerned.</p>
	<p>▼ Version and date</p> <hr/> <p>V.07_January 2024</p>