

WHISTLEBLOWING: SOME KEY CONCEPTS EXPLAINED

	A. CATEGORIES OF DATA: the object of the processing may be your personal data such as identification data, personal data, contact data, data relating to your job title and any further information related to the unlawful conduct and the persons involved, as well as any other personal data contained in the report and/or in the attached supporting documentation
	B. DATA CONTROLLER: The Data Controller shall be The British School of Milan S.R.L., VAT NO. 13127740150, with registered office in Via Pisani Dossi, 16 – 20134 Milano
	C. SOURCE OF PERSONAL DATA: The personal data held by the Controller shall be collected directly from the data subject. Subsequently, the Controller may collect other data during the investigation phase.
	D. PURPOSE OF DATA PROCESSING AND LEGAL BASIS: Personal data shall be processed by the Data Controller for the following purposes: - Purposes related to legal obligations provided for by the Whistleblowing legislation pursuant to Legislative Decree 24/2023, (Art. 6, par. 1, lett. c) and Art. 9, par. 2, lett. b) of the GDPR) concerning the protection of persons who report breaches of Union law and national regulations. Personal data shall be processed in the context of the management of 'whistleblowing' reports, exclusively for the purpose of managing and following up on the reports. - Purposes based on explicit consent for voice recording via voice messaging system, in order to keep a record of the oral report submitted
	E. RECIPIENTS OF THE DATA: to the extent relevant to the purposes, your data shall be communicated to the Reporting Manager. Moreover, subject to the adoption of measures aimed at ensuring the confidentiality of the identity of the reporting party and any further element of the report, to the National Anti-Corruption Authority; to the ordinary judicial authority or to the accounting judicial authority; to the company that provides IT services, which allow the operation of the IT tools enabling the report, duly appointed as data processor pursuant to Art. 28 GDPR; to other subjects connected to the processing activities; to public and private entities as prescribed by law; to law firms or other qualified professionals for the purpose of studying and solving any legal problems; to trade union associations in the cases provided for by law and contract provisions, and to other individuals functional to the achievement of the above-mentioned purposes. Your data shall not be disseminated in any way.
	F. DATA TRANSFER TO THIRD COUNTRIES: data collected may be transferred to third countries outside the European Economic Area, by virtue of Commission Implementing Decision (EU) 2021/1773 of 28 June 2021 pursuant to Directive (EU) 2016/680 of the European Parliament and of the Council on the adequate protection of personal data by the United Kingdom (notified under C (2021) 4801)
	G. STORAGE PERIOD: the data collected shall be kept for as long as necessary for the purpose of the processing of the report and in any case no longer than five years from the date of communication of the final outcome of the reporting procedure. A check on the obsolescence of the stored data as regards the purposes for which they were collected, shall be carried out periodically.
	H. RIGHTS OF THE DATA SUBJECT: The rights set out in Articles 15 to 22 of Regulation (EU) 2016/679 may be exercised within the limits of the provisions of Article 2-undecies of Legislative Decree No 196 of 30 June 2003, to which reference is made.

	I. OBLIGATION TO PROVIDE DATA: The provision of personal data is optional. However, failure to provide it, may jeopardise preliminary investigation of the report.
	J. DATA PROCESSING METHODS: the data will therefore be processed using both IT tools on paper and any other suitable type of support (e.g. cloud systems, archiving systems ...), in compliance with the appropriate technical and organisational security measures provided for by the GDPR and current legislation on whistleblowing. The data subject has access to an internal written and oral whistleblowing channel (recorded voice messaging) via the Tip-Off platform: the use of the channel guarantees suitable measures to ensure the confidentiality of the information reported. The use of the channel guarantees appropriate measures that ensure the confidentiality of the reported information. The platform provider is not able to identify the reporting party, the system does not store data of the devices used to make the report such as IP address and browsing data, the communication channel adopts RSA encryption and the database is encrypted. For voice recording, the software adopts as an additional security measure the alteration of the voice timbre in such a way as to prevent the reporting party from being recognised. The external reporting channel is set up by ANAC at www.whistleblowing.anticorruzione.it.
	K. CONTACT DETAILS OF THE D.P.O. The Controller has appointed a D.P.O., who can be contacted by e-mail at dpo@bsm.school
	L. AUTOMATED DECISION-MAKING PROCESSES: No automated decision-making processes are envisaged.