



## Information on the processing of the Whistleblower's personal data under the provisions of the Law of 14 June 2024 on the protection of whistleblowers (Journal of Laws of 2024, item 928)

### (Who will process your personal data how and why?)

Since you have reported a violation of the law as a Whistleblower, pursuant to the provisions of the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws of 2024, item 928, hereinafter: "**the Act**"), in accordance with Article 13 of the Regulation of the European Parliament and of the Council (EU) of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter: "**GDPR**"), we inform you that:

### Who will control your personal data?

- 1) The Controller of your personal data (hereinafter: '**Data**') provided in connection with the notification of an infringement (hereinafter: '**notification of a Whistleblowers** ') is **Eviden Polska S.A.** with its seat in Warsaw at ul. Puławska 180 (02 - 670 Warsaw), registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, XII. Economic Division of the National Court Register under KRS no.: 0000013369, NIP 7292421372, REGON 472311496, share capital: PLN 42,639,203.74 - (hereinafter: "**Controller**").
- 2) The Controller can be contacted by mail at the following address: **Eviden Polska S.A.** with its seat in Warsaw at ul. Puławska 180 (02 - 670 Warsaw), or via the form: <https://atos.net/en/privacy/exercise-rights-regarding-personal-data>.
- 3) The Controller has appointed a **Data Protection Officer**, who can be contacted by mail at the following address: **Eviden Polska S.A.** with its seat in Warsaw at ul. Puławska 180 (02 - 670 Warsaw), or via the form: <https://atos.net/en/privacy/exercise-rights-regarding-personal-data>.

### Why and on what legal basis will your personal data be processed?

Your personal data will be processed on the following legal grounds and for the following purposes:

- a. verification and processing of a notification of a breach of the law - the legal basis for the processing is Article 6(1)(c) GDPR, in relation to the Act, i.e. a legal obligation incumbent on the Controller; in particular, the obligation to process the Data to the extent necessary for the acceptance of the notification or any follow-up action;
- b. where the whistleblower has given prior voluntary consent to the disclosure of their identity, to the extent of the disclosure - the legal basis for the processing is Article 6(1)(a) GDPR; i.e. your consent to the processing of personal data to the extent applicable, within the limits permitted by law;
- c. the fulfilment of the Controller's legitimate interest in establishing, investigating or defending against claims - the legal basis for the processing is Article 6(1)(f) GDPR
- d. where special categories of personal data are obtained that are processed in the context of a notification for reasons of substantial public interest - the legal basis for the processing is Article 9(2)(g) GDPR.

The Controller shall process your data, which may include: name, surname, contact data, address data, position (function held), any data indicated in the notification or obtained by the Controller in the course of the verification procedure.

At the same time, the Controller indicates that the assumption of the proceedings concerning the reported irregularities is to process only personal data necessary for its proper conduct. Data which will not be relevant for the consideration of the notification submitted by you are not collected, and if collected, they are deleted immediately.

## With whom will your personal data be shared?

The Controller does not plan to share the personal data processed in the framework of the whistleblowing procedure with recipients within the meaning of Article 4(9) GDPR, except in cases specified in the applicable legislation and where you have given your consent.

Personal Data may be communicated to the relevant authorities entitled to follow up or to other recipients to the extent necessary to fulfil the purposes indicated in point above, while considering the principle of data minimization. At the same time, the recipients of the Data may be companies within the group of companies to which the Company belongs, persons performing tasks involving the handling of notifications of irregularities based on an appropriate authorization from the Controller or processing entities based on relevant data processing entrustment agreements. In doing so, the Controller shall take due care that your personal data are not processed by unauthorized entities or persons.

Data will not be transferred outside the European Economic Area. However, if the necessity arises (e.g. in terms of the IT structure used), the transfer will take place to countries which, in accordance with the decision of the European Commission, provide an adequate level of protection of personal data in accordance with EEA standards. For recipients in the territory of countries not covered by the European Commission's decision - in order to ensure an adequate level of such protection - the Controller will enter into agreements with the recipients based on the standard contractual clauses issued by the European Commission, in accordance with Article 46(2)(c) of the GDPR. Should you wish to obtain further information regarding the transfer of Data or the applicable standard contractual clauses, please contact us at the addresses indicated above in this document.

## What are your rights in relation to the Controller's processing of your personal data?

In relation to the processing of your personal data by the Controller in the context of the investigation of a breach report, you have the right to:

- a. access to the content of the Data (pursuant to Article 15 of the GDPR),
- b. to request rectification of the Data (pursuant to Article 16 of the GDPR),
- c. request deletion of the Data (pursuant to Article 17 of the GDPR),
- d. request the restriction of the processing of the Data (pursuant to Article 18 GDPR),
- e. to object in the case of Data processed on the basis of the legitimate interests of the Controller (pursuant to Article 21 GDPR),
- f. revoke the consent given to process the Data at any time in the case of processing of the Data on the basis of consent. The withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal,
- g. The right to lodge a complaint with the supervisory authority, the President of the Data Protection Authority, if you consider that the processing of your data violates the provisions of the GDPR,

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You may exercise the above rights by making a relevant statement to the Controller, sent to the Controller's contact addresses indicated above in this document.

You have the right to lodge a complaint to the supervisory authority, i.e. the President of the Office for Personal Data Protection, in relation to the processing of your Personal Data.

## How long will your personal data be processed?

Your personal data and other information in the register of internal notifications will be retained for a period of 3 years after the end of the calendar year in which the follow-up actions have been completed or the proceedings initiated by these actions have been concluded.

## Is it compulsory to provide personal data?

Provision of the Data is necessary in order for the Controller to fulfil the legal obligations imposed on it in connection with the processing of notifications of irregularities regulated by the Act. At the same time, your provision of Data processed by the Company on the basis of your consent is fully voluntary, and failure to provide such Data will not have negative consequences for you.

## Is decision-making done by automated means?

Your personal data processed by the Controller in the course of dealing with a breach notification will not be subject to automated decision-making, including profiling.