

PRIVACY POLICY

QUALIFYZE'S WHISTLEBLOWING CHANNEL

In connection with the Directive (EU) 2019/1937, of 23rd October 2019, on the Protection of persons who report breaches of Union law and the Spanish Law 2/2023, for the protection of people who report breaches of regulations and to fight against corruption, Qualifyze GmbH and its affiliates, Qualifyze Spain S.L.U. and Qualifyze Inc. (hereinafter "Qualifyze") implemented Qualifyze's Whistleblowing Channel.

The processing of personal data derived from the Whistleblowing Channel will be processed in accordance with the Regulation (EU) 2019/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regards to the processing of personal data and on the free movement of such data, as well as the Spanish Law 3/2018, of 5th December, on the Protection of Personal Data and guarantee of digital rights.

RIGHT TO INFORMATION

1. Purpose and lawful basis of processing:

People that submit a report of a breach or makes a public disclosure (the "Whistleblower/s") have the right not to have their identity disclosed to third parties. Qualifyze's Whistleblowing Channel **does not obtain data that allow the identification of the Whistleblower** and has adequate technical and organizational measures in place **to preserve the identity and ensure the confidentiality of the data** pertaining to the persons concerned and any third party mentioned in the information provided, especially the identity of the Whistleblower in case he/she could be identified.

The identity of the Whistleblower will in all cases be reserved, and it will not be communicated to the people to whom the reported events relate or to third parties.

The person to whom the reported events refer, will under no circumstances be informed of the identity of the Whistleblower. The identity of the Whistleblower may only be communicated to the Judicial Authorities, Public Prosecutor's Office ("*Ministerio Fiscal*") or the competent administrative authority within the framework of a criminal, disciplinary or sanctioning investigation.

Personal data shall not be collected if it is not manifestly relevant to the processing of specific information related to the reported breach or, if collected by accident, it shall be deleted without undue delay. If the report contains personal data included within the special categories of data, it shall be immediately deleted, without processing it.

The lawful basis for the processing of personal data is the fulfilment of a legal obligation by Qualifyze.

The purpose of the processing is the management of Qualifyze's Whistleblowing Channel. No profiling will be carried out.

2. Co-Controllers of the personal data ("Data Controllers") are:

Qualifyze Spain, S.L.U.

Register number: B-09813791.

Company registered address: Passeig de Gràcia, 19, Planta 5,
08007, Barcelona, Spain

Phone number: +34 930 46 65 57

Email: legal@qualifyze.com

And,

Qualifyze GmbH

Register number: HRB 109483

Company registered address: Bockenheimer Anlage 46,

60322, Frankfurt am Main, Germany Phone number: +34 930 46 65 57

Email: legal@qualifyze.com

3. Recipients

Access to personal data contained within the Whistleblowing Channel will be limited, within the scope of its powers and functions, exclusively to:

- a) The person responsible for the system (IIS Responsible) and whoever manages it directly (Case Managers).
- b) Chief People Officer only when disciplinary measures could be adopted against an employee.
- c) Head of Legal, if the adoption of legal measures is appropriate in relation to the facts reported in the communication.
- d) The data processors that may be eventually designated, at the moment Personio.
- e) Data Protection Officer.

The processing of data by other people, or even its communication to third parties, will be lawful when it is necessary for the adoption of corrective measures in the Company or the processing of sanctioning or criminal procedures that, where appropriate, may apply.

No transfers will be made to third countries outside the European Union.

4. Collected personal data and Data subject rights:

Qualifyze may obtain personal data in the context of the use of the Qualifyze's Whistleblowing Channel, in particular, but not limited, the following data may be collected and processed during the reporting and investigation process managed by Qualifyze:

- identity, job position and contact details of the Whistleblower, including the Whistleblower's corporate and/or personal email,
- identity, job position and contact details of the individual(s) mentioned in the concern reported (individuals against whom an allegation has been made

- (affected/concerned person) or those who have been identified as having information about the allegation (witnesses or any other third party),
- as well as any other personal information voluntarily communicated by the Whistleblower or resulting from the handling of the report.

The data subjects may exercise their rights of access to their data, rectification, erasure of personal data, restriction of the processing, object to the processing and portability. As well as the right to withdraw consent at any time, without it affecting the lawfulness of the processing based on consent before its withdrawal by sending an email or mail to the addresses specified in point 1 above.

The data subjects have the right to lodge a complaint with the supervisory authority the “Agencia Española de Protección de Datos” (www.aepd.es).

5. Conservation period:

The data that are subject to processing will be kept in the Whistleblowing Channel only for the time necessary to decide on whether to initiate an investigation into the reported events and then they will be retained for such period as is necessary and proportionate for the purpose of complying with the law.

If it is proven that the information provided or part of it is not truthful, it will be immediately deleted from the moment there is evidence of said circumstance, unless said lack of truthfulness may constitute a criminal offense, in which case it will be kept for the necessary time during which the judicial procedure is processed.

In any case, after three months from receipt of the communication without investigation actions having been initiated, it will be deleted, unless the purpose of conservation is to leave evidence of the operation of Whistleblowing Channel. Communications that have not been processed may only be recorded in anonymized form, without the blocking obligation being applicable.

Personal data related to the information received and the internal investigations referred to will only be kept for the period that is necessary and proportionate for the purposes of complying with the Law. In no case may the data be kept for a period exceeding ten years.