

## **PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA UNDER ART. 13 OF REGULATION (EU) 2016/679 AND ART. 13 UK GDPR OF FOR WHISTLEBLOWING REPORTS**

This document informs you that, in compliance with Article 13 of EU Regulation 2016/679 (referred to as "**Regulation**" or "**GDPR**") and Article 13 of UK GDPR ("**UK GDPR**"), your personal data may be collected and processed in the context of reporting illegal activities or suspicious behavior that could constitute a violation of the rules governing the activities of Onetag Ltd., with registered office in 5th Floor North Side 7/10 Chandos Street, Cavendish Square, London, United Kingdom, W1G9DQ, (hereinafter "**Onetag**" or the "**Company**"). The data will be processed by the Company, acting as the Data Controller.

This document supplements the privacy notice already provided to employees. According to Article 13(4) of the Regulation and Article 13(4) of the UK GDPR, the information previously provided to the data subject does not need to be repeated here.

### **1. Data Controller**

The Data Controller of your personal data is Onetag, as defined above. Onetag has appointed a Data Protection Officer (DPO), available for any inquiries regarding the processing of your personal data at [dpo@onetag.com](mailto:dpo@onetag.com).

### **2. Categories and Types of Personal Data**

The personal data processed may include your identification information (e.g., name, email address) and identification data of the reported individual. Whistleblowing reports may also contain sensitive data under Article 9 of the GDPR and Article 9 of the UK GDPR (e.g., racial or ethnic origin, religious beliefs, health, sexual orientation), as well as judicial data under Article 10 of the GDPR and Article 10 of the UK GDPR (e.g., criminal convictions). We advise you not to provide such sensitive data unless strictly necessary for the Whistleblowing Report.

### **3. Purposes and Legal Basis for Processing**

Your personal data will be processed for receiving, analyzing, and managing Whistleblowing Reports. This processing is justified by Article 6(1)(f) of the GDPR and Article 6(1)(f) of the UK GDPR, reflecting the Company's legitimate interest in identifying and preventing illegal conduct and ensuring compliance with the Public Interest Disclosure Act 1998 ("**PIDA**").

If the Whistleblowing Report is substantiated, the Company may further investigate the facts. In such cases, the legal bases for data processing include legitimate purposes, in order to respect the fundamental rights and freedoms of the subjects (Article 6(1)(f) GDPR and Article 6(1)(f) UK GDPR); Articles 6(1)(c) of the GDPR and Articles 6(1)(c) of the UK GDPR (for legal obligations); and 9(2)(f) of the GDPR and of the UK GDPR (for establishing, exercising, or defending legal claims).

The Company's legitimate interest in preventing unlawful or suspicious behavior, as regulated by Onetag, outweighs the rights and freedoms of data subjects, given the reasonable expectation of data processing in a work relationship context.

You may object to the processing based on legitimate interest by writing to [dpo@onetag.com](mailto:dpo@onetag.com) and specifying the grounds for the objection, as outlined in Section 9 of this notice.

#### 4. Confidentiality of Reports

Your personal data related to the Whistleblowing Report will be processed exclusively by personnel authorized and bound to confidentiality, except as required by law (see Section 5.c).

#### 5. Recipients and Data Transfer

Your personal data, along with other data provided in the Whistleblowing Report, may be shared as strictly necessary with:

- a) **WST Law Firm:** the designated recipient of Whistleblowing Reports via the Whistleblower Software platform. WST's responsibilities include acknowledgment, initial assessment, and transmission of the report to Onetag's appointed contact, as well as managing the response to the report as instructed by Onetag.
- b) **ABLex S.r.l.:** the company providing the platform for Whistleblowing Reports.
- c) **External Legal Advisors:** subject to confidentiality obligations, who may provide consulting services to the Company.
- d) **Entities, Organizations, or Authorities:** as required by law or official orders.
- e) Public bodies or institutions in accordance with: (i) the powers conferred upon them, (ii) Judges and Courts, when necessary for the adoption of disciplinary measures, (iii) the Public Prosecutor's Office, when the procedure falls within its jurisdiction, while preserving the confidentiality of the data, and (iv) the Independent Whistleblower Protection Authority.

#### 6. Transfer of Data Outside the EU/UK

Your personal data will not be transferred outside the European Economic Area or the UK.

#### 7. Data Retention

Your data will be retained for the duration necessary for processing purposes and in accordance with the five-year statutory limitation for actions arising from the report, per Article 5(1)(c) GDPR and Article Article 5(1)(c) of the UK GDPR.

#### 8. Your Rights

You may request information on the processing of your data, access to your personal data, rectification or deletion, and restriction of processing under Article 18 of the Regulation. You may also object to processing based on the Company's legitimate interest, as specified in Article 21(1) and Article 21(1) of the UK GDPR.

Requests can be sent to [dpo@onetag.com](mailto:dpo@onetag.com). You also have the right to lodge a complaint with the competent authority (Data Protection Authority) or pursue judicial remedies (Article 79 of the GDPR and Article Article 79 of the UK GDPR).

**Whistleblowing Privacy Notice - Last Modified 15<sup>th</sup> November 2024**