

## **Information about processing personal data- whistleblower**

This information applies to the whistleblower's data provided to the Controller as part of a report of a violation of law, in accordance with the provisions of the protection whistleblower act.

### **I. Data Controller/ Data Protection Officer**

The Controller of your personal data is the Comarch Group Company to which the violation report relates.

The current list of Comarch Group Companies and their contact details are available on the websites:<https://www.comarch.com/company/capital-group/>,  
<https://www.comarch.com/contact/worldwide-offices/>

Information about the appointed Data Protection Officers is available on the website:  
<https://www.comarch.com/data-protection-officer/>

In matters concerning the processing of personal data by the Controller, you can contact us at the following e-mail address: [iod@comarch.pl](mailto:iod@comarch.pl).

### **II. Legal bases, purpose of data processing, period of data processing**

Your personal data provided in the report of a violation of the law will be processed for the purpose of carrying out tasks related to the procedure for handling internal whistleblower reports based on:

1/ article 6. 1. c) GDPR i.e. the legal obligation regarding the provisions of the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws, item 928), in the case of ordinary data;

2/ article 9. 2. g) GDPR i.e. processing is necessary for reasons of important public interest, in the case of special category of personal data;

3/ article 6. 1. a) GDPR i.e. consent, if you consent to the disclosure of your identity.

Your personal data will be stored for a period of 3 years after the end of the calendar year in which the follow-up actions related to the report were completed or after the proceedings initiated by these follow-up actions were completed.

Personal data that is not relevant to the consideration of the application is not collected, and in the event of accidental collection is immediately deleted. The deletion of such personal data takes place within 14 days from the moment it is determined that it is not relevant to the case.

### **III. Voluntary provision of data, Protection of the whistleblower's identity.**

You can make anonymous report.

If you provide identifying information, your personal data will not be disclosed to unauthorized persons (i.e. persons outside the team responsible for conducting the explanatory proceedings in connection with your report), unless you consent to the disclosure of your identity.

Consent to the disclosure of identity is voluntary and may be withdrawn at any time. The withdrawal of consent will not affect the lawfulness of data processing based on the consent before its withdrawal.

In the case of a named report, providing data is necessary for the report to be accepted and considered. In the case of an anonymous report, providing data is voluntary and is not a condition for the report to be accepted and considered.

#### **IV. Recipients, Data transfers to third countries.**

The Controller ensures the confidentiality of your personal data in connection with the received notification.

Therefore, your data may be made available only to entities authorized to do so under the provisions of law, i.e. competent authorities in the event of taking follow-up actions, suppliers and service providers with whom the Controller cooperates to the extent necessary to implement the above-mentioned purposes of processing, including in particular IT service providers.

Personal data will not be transferred to a third country.

#### **V. Rights of the data subject**

According to GDPR, you have the right to access personal data, rectification or erasure of personal data or restriction of processing of personal data.

In the event that the basis for processing is consent, you have the right to withdraw consent. The withdrawal of consent will not affect the lawfulness of data processing based on the consent before its withdrawal.

In the event of withdrawal of consent to the disclosure of your identity, personal data will not be disclosed (from the moment of withdrawal of consent) unless their disclosure is required by generally applicable provisions of law.

The implementation of these rights depends on the conditions set out in the GDPR.

In the event of an infringement of the GDPR Regulation, you may lodge a complaint with the competent supervisory authority, which in Poland is the Prezesa Urzędu Ochrony Danych Osobowych.

The data provided by you will not be subject to profiling or automated decision-making.