Netcompany

Privacy Policy for Whistleblower Arrangement

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Document history

Version	Date	Description	Pages
1.00	09/03/2023	Initial Version	All
2.00	15/05/2025	Content updated due to rebranding. File renamed from 'Privacy-Policy-Netcompany-Belgium-ENG-March-2023-reviewed-v-1.00_FINAL.pdf' to 'SEE&EUI_Whistleblower-PrivacyPolicy_BE'.	All

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This Privacy Policy explains how Netcompany S.A. Belgium (hereinafter "**Netcompany Belgium**", "**we**" or "**us**") processes personal information in connection with reports to Netcompany Belgium's whistleblower arrangement (hereinafter "**Whistleblower Arrangement**").

Below is a description of the personal data processing that takes place and the rights you have if you are reported through the Whistleblower Arrangement, as well as your rights if you use the Whistleblower Arrangement to report another person.

Reference is also made to Netcompany Belgium's Whistleblower Policy, containing information about who can submit reports and who can be reported.

This policy only concerns the handling and the investigation of reports submitted through the Whistleblower Arrangement. Therefore, this policy must - in relation to employees - be seen in connection with Netcompany Belgium's other relevant policies and procedures.

1 DATA CONTROLLER

The legal entity responsible for the processing of your personal information is:

Netcompany SA, located at Place du Champ de Mars 5 box 10, 1050 Ixelles and registered in the Crossroads Bank for Enterprises under number 0472.324.870.

Email: privacy@netcompany.com

2 DESCRIPTION OF THE PROCESSING

Whistleblower Arrangement pursuant to the Belgian Whistleblower Act

The following is a description of how Netcompany Belgium will process information on the person who is reported about (the "**Person Concerned**") as well as the person who is submitting the report (the "**Whistleblower**") in connection with reports to Netcompany Belgium's Whistleblower Arrangement established pursuant to the Belgian Act of November 28, 2022 on the protection of reporters of breaches of Union or national law established within a legal entity in the private sector (hereinafter referred to as "Belgian Whistleblower Act").

Purpose	Categories of Personal Data	Legal Basis for the Processing	Recipients	Data Retention
#1 Handling and investigation of reports under Netcompany Belgium's Whistleblower Arrangement regarding: • The Person Concerned	We can process the following personal data categories about you: Ordinary personal data:	We process your personal data on the following bases: • The Belgian Whistleblower Act: Necessary to enable Netcompany	We can share your personal information with: • Plesner Law Firm	We will retain personal data for as long as it is necessary for the purposes listed. • The data are retained for as long as the investigation is in progress. The retention

Sources We can collect information from the following sources: • Plesner Law Firm • Employees of Netcompany Belgium • Self-employed persons, consultants • Shareholders and members of the executive board, General Manager, board of directors, or similar governing body in the undertaking • Volunteers • Paid and/or unpaid trainees • Persons working under the supervision and management of contracting parties, suppliers, and sub-suppliers • Persons who are reporting information to which they have gained access in a work-related relationship that has ceased since then. • Persons in work-related relationships that have not yet commenced, who report information on violations to which they have gained access during the course of the recruitment process or other pre-contractual negotiations.	• Name, email, telephone number, • Other information included in the report. Sensitive information, including information on sexual matters, may be included in the processing. Information on criminal offences or possible criminal offences may also be included in the processing. Netcompany Belgium has taken the appropriate technical and organizational measures, in order to collect the necessary and appropriate data, not only as far as the receipt of each report is concerned, but also for monitoring its status.	Belgium to process reports received under Netcompany Belgium's Whistleblower Arrangement, established pursuant to the Belgian Whistleblower Act, cf. - GDPR, Article 6.1.c: Necessary for the compliance with a legal obligation to which Netcompany Belgium is subject pursuant to the Belgian Whistleblower Act; - GDPR, Article 6.1.e: necessary for the performance of a task carried out in the public interest; - GDPR, Article 9.2.g: Processing is necessary for reasons of substantial public interest; - the Belgian privacy and data protection Act.	• Netcompany S.A. (Luxembourg) IT suppliers • External advisors • The police • Public authorities.	period depends on the outcome of the investigation. • Data which are obviously not related t the handling of a specific report, or are excessive, are deleted without undue delay, in case they have been randomly collected. • Reports submitted to the Whistleblower Arrangement are in principle deleted after 45 days, unless Netcompany Belgium has legitimate reasons for continued retention. • Reports falling outside the scope of the Whistleblower Arrangement, but not appearing to be unfounded, will be passed on to the Legal Director of Netcompany Belgium where they will be processed in accordance with Netcompany Belgium's relevant policies and procedures. • Reports turning out to be unfounded will be immediately closed in the Whistleblower Arrangement and deleted within 45 days after having been deemed to be unfounded. • If a report is conveyed to the police or another public authority, the data will be retained for at least as long as the investigation is in progress at the

				police/public authority. Any information included in the report may be used as evidence in administrative, civil and criminal investigations and proceedings. • Otherwise, the data will be retained in accordance with Netcompany Belgium's deletion policy that is included in the general Privacy Notice.
Purpose	**Categories of Personal Data**	**Legal Basis for the Processing**	**Recipients**	**Data Retention**
#2 Handling and investigation of reports under Netcompany Belgium's Whistleblower Arrangement regarding: • The Whistleblower If there is suspicion of the report being deliberately false, this purpose also comprises investigation of the Whistleblower. **Sources** We can collect information from the following sources: • Plesner Law Firm • The Whistleblower	We can process the following categories of personal data about you, provided that your report is not anonymous: <u>Ordinary personal data</u>: • Name, email, telephone number, • The contents of your report. As a rule, no sensitive information about you will be processed as part of the handling of the report - unless you choose to provide such information yourself. However, information on criminal offences or possible criminal offences may be included in the processing if there is a suspicion that the submitted report is deliberately false.	We process your personal data as described above on the following bases: • The Belgian Whistleblower Act: Necessary to enable Netcompany Belgium to process reports received under Netcompany Belgium's Whistleblower Arrangement, established pursuant to the Belgian Whistleblower Act, cf. - GDPR, Article 6.1.c: Necessary for the compliance with a legal obligation to which Netcompany Belgium is subject pursuant to the Belgian Whistleblower Act; - GDPR, Article 6.1.e: Necessary for the performance of a task carried out in the public interest; - GDPR, Article 9.2.g: Processing is necessary for reasons of substantial public interest; - The Belgian privacy Data Protection Act.	We can share your personal information with: • Plesner Law Firm • Netcompany S.A. (Luxembourg) • IT suppliers • External advisors • The police and • Public authorities.	We will retain personal data for as long as it is necessary for the purposes listed. • The data are retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. • Data which are obviously not related t the handling of a specific report, or are excessive, are deleted without undue delay, in case they have been randomly collected. • Reports submitted to the Whistleblower Arrangement are in principle deleted after 45 days, unless Netcompany Belgium has legitimate reasons for continued retention. • Reports falling outside the scope of the Whistleblower Arrangement, but not appearing to be unfounded, will be passed on to the Legal Director of Netcompany Belgium where they will be processed in accordance with Netcompany Belgium's relevant policies and procedures. • Reports turning out to be unfounded will be immediately closed in the Whistleblower Arrangement and deleted

	Netcompany Belgium has taken the appropriate technical and organizational measures, in order to collect the necessary and appropriate data, not only as far as the receipt of each report is concerned, but also for monitoring its status.			within 45 days after having been deemed to be unfounded. • If a report is conveyed to the police or another public authority, the data will be retained for at least as long as the investigation is in progress at the police/public authority. Any information included in the report may be used as evidence in administrative, civil and criminal investigations and proceedings. • Otherwise, the data will be stored in accordance with Netcompany Belgium's deletion policy that is included in the general Privacy Notice.

3 INFORMATION TO THE WHISTLEBLOWER

If you submit a report, access to your data and any information that can lead to your identification is only available to the competent persons within Netcompany Belgium's Whistleblower Arrangement. This information may be disclosed to third parties only in cases where it is required by Union or Belgian law, in the context of investigations by competent authorities or in the context of legal proceedings.

4 INFORMATION TO THE REPORTED PERSON AND RECTIFICATION

If you are subject to a report submitted through the Whistleblower Arrangement, you will be notified as soon as possible after an initial investigation has taken place and all relevant evidence is secured. In this connection, you will receive information about:

- The identity of the person(s) who is/are responsible for the investigation of the report
- A description of the contents of the report

As mentioned below in the section about your general rights, you have a right of access to the report that was submitted about you. However, your right to access to the report might be limited in accordance with the Belgian Whistleblower Act.

You also have the right to request rectification of the information in the report if you believe this to be false, misleading, or incomplete. If your request in this respect cannot be met, the information will be supplemented with your comments.

5 CONSEQUENCES OF THE PROCESSING

Reports and investigation of reports to the Whistleblower Arrangement may have significant consequences for the person concerned, as reports concern violations or suspected violations of the law, as further outlined in the separate guidelines for the Whistleblower Arrangement.

Likewise, a report to the Whistleblower Arrangement may have significant consequences for the person who has submitted the report in case of a deliberately false report. Such cases may have criminal consequences.

6 TRANSFERS TO COUNTRIES OUTISE THE EU/EEA

Your personal data will not be transferred to countries outside the EU/EEA.

7 YOUR GENERAL RIGHTS

You have the following rights:

- You have the right to request access to and rectification or deletion of your personal data.
- You also have the right to object to the processing of your personal data and have the processing of your personal data restricted.
- You have the right to receive the personal information provided by yourself in a structured, commonly used and machine-readable format (data portability).
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Belgian Data Protection Authority.

You are furthermore entitled to dispute our processing of your personal data in the following events:

- If our processing of your personal data is based on the GDPR, Article 6.1 (e) (public interest or exercise of official authority) or Article 6.1 (f) (balancing of interests), (please refer hereinabove the legal basis for the processing), you are, at any time, entitled to dispute such processing for reasons related to your particular situation.

There may be conditions or limitations on these rights, e.g., you may not be entitled to deletion of your personal data in a specific case – this depends on the specific circumstances of the processing activities.

In case of limitations in exercising your rights, Netcompany Belgium, as data controller, takes all necessary technical and organizational measures, with the aim of protecting your rights and freedoms.

You can make use of your rights by contacting.

8 IT POLICY

For employees of Netcompany Belgium, reference is made to Netcompany Belgium's Employee Handbook containing information on Netcompany

Belgium's IT and email policy.

9 QUESTIONS

If you have any questions regarding this policy, please feel free to contact privacy@netcompany.com

This Policy has been updated on or before: *May 2025.*