Netcompany

Privacy Policy for Whistleblower Arrangement

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Issued By	Legal

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Document history

Version	Date	Description	Pages
1.00	08/06/2022	Initial Version	All
2.00	18/11/2022	Specialization of the procedure for submitting, receiving and monitoring reports to public and private sector bodies.	All
3.00	08/05/2025	Content updated due to rebranding. File renamed from 'Netcompany-Intrasoft-Privacy-Policy-GR-Branch-EN' to 'SEE&EUI_Whistleblower-PrivacyPolicy_GR'.	All

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This Privacy Policy explains how Netcompany SA Greek Branch (hereinafter referred to as "**Netcompany**", "**we**" or "**us**") processes personal information in connection with reports to Netcompany**'**s 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 '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**'**s other relevant policies and procedures.

1 DATA CONTROLLER

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

SA GREEK BRANCH

General Electronic Commercial Registry no.: 123949801001

13 Fragkokklisias Street

GR 15125, Marousi, Greece

Email: privacy@netcompany.com

2 DESCRIPTION OF THE PROCESSING

Whistleblower Arrangement

The following is a description of how Netcompany will process information on the person who is reported about (the "Reported Person") as well as the person who is submitting the report (the "Whistleblower") in connection with reports to Netcompany 's Whistleblower Arrangement established within the scope of the EU Directive 2019/1937 and Law No. 4990/2022 on the protection of whistleblowers.

Purpose	Categories of Personal Data	Legal Basis for the Processing	Recipients	Data Retention
#1 Handling and investigation of reports under Netcompany 's Whistleblower Arrangement regarding: • The Reported Person **Sources** We can collect information from the following sources: • Plesner Law Firm • Employees of Netcompany • Self-employed persons, non-salaried employees, consultants • Shareholder, General Managers, members of the 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	We can process the following personal data categories about you: Ordinary personal data: • 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. We have 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.	We process your personal data on the following bases: • Chapter II of the EU Directive 2019/1937: Necessary to enable Netcompany to process reports received under Netcompany 's Whistleblower Arrangement. • Chapter C of Law 4990/2022: Necessary to enable Netcompany to process reports received under Netcompany 's Whistleblower Arrangement. • Article 9 of the Greek Employment Law 4808/2021 regarding the new measures for the elimination of violence and harassment in the workplace • GDPR, Article 6.1.c: Necessary for the compliance with a legal obligation to which Netcompany is subject 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	We can share your personal information with: • Plesner Law Firm • Netcompany SA • IT suppliers • External advisors • The police • Public authorities, e.g., the Hellenic Data Protection Authority, or relevant tax authorities.	We will retain personal data for as long as it is necessary and reasonable 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 to 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 Arrangement are in principle deleted after 45 days, unless Netcompany 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 Netcompany 's Legal Director where they will be processed in accordance with Netcompany '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.

information on violations to which they have gained access during the course of the recruitment process or other pre-contractual negotiations.		• Law no 4624/2019 - Hellenic Data Protection Authority (HDPA), measures for implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data, and transposition of Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016, and other provisions.		• 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 '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 '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 • You	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	We process your personal data on the following bases: • Chapter II of the EU Directive 2019/1937 Necessary to enable Netcompany to process reports received under Intasoft's Whistleblower Arrangement. • Chapter C of Law 4990/2022: Necessary to enable Netcompany to process reports received under Netcompany's Whistleblower Arrangement. • Article 9 of the Greek Employment Law 4808/2021 regarding the new measures for the elimination of violence and harassment in the workplace • GDPR, Article 6.1.c: Necessary for the compliance with a legal	We can share your personal information with: • Plesner Law Firm • Netcompany SA • IT suppliers • External advisors • The police Public authorities, e.g., the Hellenic Data Protection Authority, or relevant tax authorities.	We will retain personal data for as long as it is necessary and reasonable 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 to 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 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 Netcompany's Legal

	criminal offences may be included in the processing if there is a suspicion that the submitted report is deliberately false. We have 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.	obligation to which Netcompany is subject 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 • Law no 4624/2019 - Hellenic Data Protection Authority (HDPA), measures for implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data, and transposition of Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016, and other provisions.	

3 INFORMATION TO THE REPORTING PERSON

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's Whistleblower Arrangement. This information may be disclosed to third parties only in cases where it is required by EU or national 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

Netcompany shall not inform you, in particular with regard to the source of the data, for as long as necessary and only if this is necessary under specific conditions, in derogation of point a, paragraph 1 of article 5, articles 12 and 13, paragraphs 1 to 4 of article 14 and article 34 GDPR.

In any case, your identity is protected for the duration of the investigation, which was initiated by 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. Your right of access is also governed by Art. 33 of the Law no. 4624/2019.

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 who is reported, as reports concern violations or suspected violations of the law, as further outlined in the separate guidelines for the 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 Hellenic 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, 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 privacy@netcompany.com

8 IT POLICY

For employees of Netcompany, reference is made to Netcompany's Employee Handbook containing information on " Acceptable Use of Information Systems Policy of NETCOMPANY S.A".

9 QUESTIONS

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

Last updated on or before May 2025