PRIVACY POLICY FOR WHISTLEBLOWER ARRANGEMENT

NETCOMPANY POLAND SP. Z O.O.

This Privacy Policy explains how Netcompany ("**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, otherwise involved in the report or follow – up actions, 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 Poland Sp. z o.o.

ul. Puławska 180

02-670 Warszawa

Email: gdpr@netcompany.com

2 DESCRIPTION OF THE PROCESSING

2.1 Whistleblower Arrangement pursuant to the Polish Whistleblower Act

The following is a description of how Netcompany will process information on the person who is reported about (the "**Reported Person**"), the witnesses and other persons involved, as well as the person who is submitting the report (the "**Whistleblower**") in connection with reports to Netcompany's Whistleblower Arrangement established pursuant to the Polish Act on the Protection of Whistleblowers ("Whistleblower Act").

Purpose	Categories of Personal Data	Legal Basis for the Processing	Recipients	Data Retention
#1Handling and investigation of reports under Netcompany's Whistleblower Arrangement, undertaking follow-up actions, conducting the register of reports. Processing of data regarding: • The Reported Person • Witnesses and other persons involved in the reporting, including the person assisting the whistleblower in reporting and related with the whistleblower	We can process the following personal data categories about you: <u>Ordinary personal data</u>: • Name, email telephone number, • Reported violation of law • Other information included in the report • Data gathered during the investigation, including provided by you. <u>Special categories data</u>, as defined in art. 9 GDPR, including information on sex life, may be included in the processing. <u>Information on criminal offences or possible criminal offences</u> may also be included in the processing.	We process your personal data on the following bases: • Necessary to enable Netcompany to process reports received under Netcompany's Whistleblower Arrangement, established pursuant to the Whistleblower Act, conduct relevant investigation and undertake follow up actions, as well as to conduct register of reports - GDPR, Article 6.1.c: Necessary for the compliance with a legal obligation to which Netcompany is subject pursuant to art 8 item 4 of the 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, on the basis of art. 8 item 4 of the Whistleblower Act; - - GDPR, Article 6.1.f - legitimate interest of Netcompany, consisting in particular in pursuing and defending against legal claims.	We can share your personal information with: • Plesner Law Firm • Netcompany Group A/S • NC TopCo A/S • Intrasoft International Scandinavia • IT suppliers • External advisors • The police • Public authorities, e.g., the President of Polish Personal Data Protection Office, or relevant tax authorities.	We will retain personal data for as long as it is necessary for the purposes listed. • The personal data and documentation are retained for a period of three years following the end of a calendar year, in which the subsequent actions or proceedings initiated in connection with these actions, were completed. • Reports falling outside the scope of the Arrangement, but not appearing to be unfounded, will be passed on to Netcompany's General Counsel where they will be processed in accordance with Netcompany's relevant policies and procedures. • Any data not relevant for the case shall be deleted without delay, not later than within 14 days from the date they were determined as not relevant. • The personal data processed in the register of reports is kept for 3 years upon the end of a calendar year in which the subsequent action or subsequent proceedings (initiated by these actions) were finished. • Any personal data which is relevant for the purposes of protection against or pursuing claims shall be processed until the end of respective period of the statute of limitation of such claims. • Otherwise, the data will be retained in accordance with Netcompany's deletion policy.

Purpose	Categories of Personal Data	Legal Basis for the Processing	Recipients	Data Retention
#2 Handling and investigation of reports under Netcompany's Whistleblower Arrangement; Conducting the register of reports; Undertaking follow-up actions, Protection of the whistleblower, Processing od data 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: • You • Other persons involved in the reporting and investigation	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, address, telephone number, • The contents of your report, • Data gathered during the investigation. . As a rule, no special categories of data 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: • Necessary to enable Netcompany to process reports received under Netcompany's Whistleblower Arrangement, established pursuant to the Whistleblower Act, conduct relevant investigation and undertake follow-up actions, as well as to conduct register of reports: - GDPR, Article 6.1.c: Necessary for the compliance with a legal obligation to which Netcompany is subject pursuant to art. 8 item 2 and 4 of the 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, on the basis of art. 8 item 4 of the Whistleblower Act; - GDPR, Article 6.1.a– consent of the whistleblower for the disclosure of data allowing for her or his identification (art. 8 item 1 of the Whistleblower Act) - GDPR, Article 6.1.f - legitimate interest of Netcompany, consisting in particular in pursuing and defending against legal claims. - GDPR, Article 9.a – consent of the whistleblower for the processing of special categories' data	We can share your personal information with: • Plesner Law Firm • Netcompany Group A/S • NC TopCo A/S • Intrasoft International Scandinavia • IT suppliers • External advisors • The police • Public authorities, e.g, the Polish President of the Data Protection Office, or relevant tax authorities.	We will retain personal data for as long as it is necessary for the purposes listed. • The personal data and relevant documentation are retained for a period of three years following the end of a calendar year, in which the subsequent actions or proceedings initiated in connection with these actions, were completed. • Reports falling outside the scope of the Arrangement, but not appearing to be unfounded, will be passed on to Netcompany's General Counsel where they will be processed in accordance with Netcompany's relevant policies and procedures. • Any data not relevant for the case shall be deleted without delay, not later than within 14 days from the date they were determined as not relevant • The personal data processed in the register of reports is kept for 3 years upon the end of a calendar year in which the subsequent action or subsequent proceedings (initiated by these actions) were finished. • Any personal data which is relevant for the purposes of protection against or pursuing claims shall be processed until the end of respective period of the statute of limitation of such claims. • Otherwise, the data will be stored in accordance with Netcompany's deletion policy. •

3 INFORMATION TO THE REPORTED PERSON AND RECTIFICATION

If you are subject to a report submitted through the Whistleblower Arrangement, you will not be notified of the processing of your data for this purpose for as long as it is likely to render impossible or seriously impair the achievement of the objectives of this processing. You will be only notified after that time and in particular 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 Polish 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.

4 OBLIGATION TO PROVIDE DATA AND CONSEQUENCES OF FAILURE TO PROVIDE IT. CONSEQUENCES OF THE PROCESSING

The Whistleblower is not obliged to provide their personal data. However, failure to provide such data may make it impossible for us to properly investigate the matter. If the Whistleblower fails to provide contact or identification data, it shall limit the possibility to maintain regular and swift communication.

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.

5 TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

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

6 YOUR GENERAL RIGHTS

You have the following rights:

- You have the right to request access to and rectification or deletion of your personal data.
- In the scope the processing is based on legitimate interests, you also have the right to object to the processing of your personal data and have the processing of your personal data restricted.
- In the scope the processing is based on consent, you shall have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

- In the scope the processing is based on your consent and automated, 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 President of Personal Data Protection Office.

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) (legitimate interests), see above under 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 applicable to the reported person, 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 or to obtain information about the identity of a person who submitted the report or that somebody assisted at it, pursuant to the regulations of the Whistleblower Act.

You can make use of your rights by contacting gdpr@netcompany.com.

7 IT POLICY

For employees of Netcompany, reference is made to Netcompany's Employee Handbook containing information on Netcompany's IT and email policy.

8 QUESTIONS

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

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