

Information Clause

RECEIPT OF REPORTS ON LEGAL VIOLATIONS

1. The administrator of personal data processed in connection with receipt and handling of whistleblower reports is the company: Cable Factory BITNER – referred to as the „Company” (correspondence address: Krakowska Street 2, Trzyciaz 32-353).
2. The data will be processed for the purpose of fulfilling obligations related to receipt and handling of reports concerning violations of law (legal basis: Article 6(1)(c) in conjunction with Articles 23,24 and 25(1)(2) and following of the Act dated 14 June 2024 on the protection of whistleblowers (Journal of Laws 2024, position 928, with subsequent amendments). The data may also be processed for the purposes of establishing, pursuing or defending against claims (legal basis: Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the Employer acting as a data controller).
3. The administrator ensures the confidentiality of personal data processed in connection with the received report. Providing personal data by the whistleblower is necessary for the processing of the report, as the Company has excluded the possibility of submitting anonymous reports. Personal data of the whistleblower, which could reveal their identity, will not be disclosed to unauthorised parties, unless the whistleblower gives their explicit consent. Personal data may be disclosed without the whistleblower`s consent where such disclosure constitutes a necessary and proportionate obligation arising from provisions of law in connection with investigative proceedings conducted by public authorities or with pre-trial or judicial proceedings conducted by courts, including for the purpose of safeguarding the right of defence of the person concerned by the report.
4. The recipients of personal data may also include: person responsible for receiving reports and conducting internal investigation of reported violations within the company and exercising overall oversight of the process of implementing follow-up actions (or their deputy), as well as members of the Legal Violations Committee. The Company may entrust personal data, for example, to entities providing IT services (subject to compliance with legal requirements and safeguards).
5. Personal data and other information`s related to the report included in the internal reporting register shall be stored for period of 3 years after the end of the calendar year in which follow-up actions were completed or proceedings initiated by such actions were concluded. Personal data processed for other purposes shall be stored for a maximum period corresponding to the limitation period for claims. Personal data may be deleted or anonymised earlier if an effective objection is raised.
6. The right to access personal data applies, including obtaining copies of data, the right to transfer data, the right to rectify and delete data, restrictions on processing and the right to object (where processing is based on Article 6(1)(f) of the GDPR). In the case of persons other than the whistleblower, the right of access to data and the information obligation do not include information about the source of the personal

data, unless the whistleblower does not meet the conditions set out in Article 6 of the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws 2024, position 928, with subsequent amendments) or has given their express consent to such disclosure. The right to submit a complaint to the supervisory authority (the President of the Personal Data Protection Office) is also granted.

7. In all matters related to personal data protection, please contact the Administrator on: bitner.rodod@bitner.com.pl or at the above correspondence address.