

INTERNAL INFORMATION CHANNEL PRIVACY POLICY

1. INTRODUCTION

This document provides information about the Privacy Policy of the Internal Information Channel (hereinafter, the “Channel”).

The Channel is the tool enabled by ECOTIC ENTIDAD ADMINISTRADORA, SL to comply with Law 2/2023 of February 20, regulating the protection of individuals who report regulatory violations and the fight against corruption.

Users may report any illegal conduct or act contrary to the law, by any member of the entity, for violations of national and European Union regulations as outlined in Directive (EU) 2019/1937 of the European Parliament and Council of October 23, 2019, for actions or omissions that cause economic damage to the Public Treasury and Social Security, and for violations of labor law related to occupational health and safety.

The informant agrees that the personal data provided are true, accurate, complete, and up to date.

The information may be submitted anonymously. Nonetheless, in all cases, the information is confidential and protected against unauthorized access.

If the communication is not anonymous, the functioning of the Channel implies the processing of the informant’s personal data by ECOTIC ENTIDAD ADMINISTRADORA, SL. Therefore, this Privacy Policy aims to inform the informant about the processing of their personal data collected through the Channel.

Data concerning the affected individuals may also be collected. Privacy information will be provided to the affected party at the first point of contact, considering the confidentiality of the information up to that moment. If the report lacks sufficient information for analysis or is deemed invalid, the affected person will not be contacted.

2. ACCEPTANCE OF THE CHANNEL'S PRIVACY POLICY

To process your report, you must confirm that you have read this Privacy Notice. If you do not accept the terms as outlined in the notice, you will not be able to submit the report.

3. DATA BEING PROCESSED

The following personal data may be collected:

- From the informant (if the report is not anonymous): full name, email address, mobile phone number, job position, and any other data included in the report content.
- From the affected individual: data provided by the informant in the content of the report.
- From third parties: name and role of individuals mentioned in the content of the report.

4. DATA CONTROLLER

The data controller is ECOTIC ENTIDAD ADMINISTRADORA, SL, with an address at Avda. Diagonal, 467, 2-1, 08036 - Barcelona.

The Data Protection Officer may be contacted at: dpd@dataprobcn.com.

5. CONFIDENTIALITY GUARANTEE FOR THE INFORMANT AND AFFECTED INDIVIDUALS

We inform you that your identity as an informant will be kept confidential and will not be disclosed to the persons referred to in the report, nor to third parties. For this purpose, ECOTIC ENTIDAD ADMINISTRADORA, SL ensures the use of effective communication systems and appropriate measures to preserve confidentiality.

ECOTIC ENTIDAD ADMINISTRADORA, SL complies with the requirements set out in Law 2/2023 of February 20, the General Data Protection Regulation (EU) 2016/679, and Article 24 of Organic Law 3/2018 of December 5 on the Protection of Personal Data and Guarantee of Digital Rights.

6. PURPOSE OF DATA PROCESSING

Data collected through the Channel will be processed solely for the purpose of handling and, where appropriate, investigating the reports submitted.

7. LEGAL BASIS

The legal basis for processing data collected through the Channel lies in public interest and legal obligation, in accordance with Law 2/2023 of February 20 and Organic Law 3/2018 of December 5.

8. DATA DISCLOSURE

Both the informant and the affected individual will be duly informed, in each case, of the specific persons and bodies to whom their data will be disclosed, especially regarding the potential non-disclosure of the informant's identity to the affected individual.

If necessary or legally required, data may be disclosed to legally authorized third parties such as Public Authorities, Judges, and Courts.

9. DATA RETENTION PERIOD

Data will be retained only for as long as necessary to decide whether the report should be pursued.

If it is confirmed that the report is unfounded, it will be immediately deleted unless it may constitute a criminal offense, in which case the data will be retained for the duration of legal proceedings.

Reports not followed up on will be deleted three months after receipt, unless their purpose is to be retained as evidence in the system. These may be stored in anonymized form.

10. EXERCISING YOUR RIGHTS

Data subjects may exercise their rights under Articles 15 to 22 of Regulation (EU) 2016/679 of April 27, 2016.

These rights can be exercised free of charge:

- By writing to ECOTIC ENTIDAD ADMINISTRADORA, SL, Avda. Diagonal, 467, 2-1, -08036- Barcelona.
- By email to ECOTIC ENTIDAD ADMINISTRADORA, SL at ecotic@ecotic.es.

The informant has the right to confirm whether ECOTIC ENTIDAD ADMINISTRADORA, SL is processing their personal data in the context of Channel management, and may request correction of inaccurate data or deletion when the data is no longer needed.

The informant may exercise their rights through the Channel, to preserve the confidentiality of their identity.

The affected person has the right to access their personal data, excluding the right to access the identity of the informant. They may also object to the processing.

If you believe your rights have not been properly addressed, you have the right to lodge a complaint with the Spanish Data Protection Agency (www.aepd.es).

11. INTERNATIONAL DATA TRANSFERS

As a general rule, data provided through the Channel will not be subject to international data transfers.

12. DATA SECURITY

ECOTIC ENTIDAD ADMINISTRADORA, SL applies and maintains appropriate technical and organizational measures to ensure a high level of security. Specifically, all available technical means have been implemented to prevent the loss, misuse, alteration, unauthorized access, and theft of the data you provide.

13.MODIFICATION OF THE INTERNAL INFORMATION CHANNEL PRIVACY POLICY

The owner of the Channel, ECOTIC ENTIDAD ADMINISTRADORA, SL, reserves the right to modify this privacy policy in case of changes in applicable legislation, case law, or internal business criteria. Any such changes will be published at this address.

14.ADDITIONAL INFORMATION

You can consult additional and detailed information about Data Protection on our website: <https://ecotic.es/en/legal/privacy-policy/>.