WHISTLEBLOWER CHANNEL PRIVACY POLICY

AZKOYEN GROUP

- **Version control**

Version	Date	Author	Changes made
1.0	September 2019	Support unit	Initial release

- **Approvals**

Governing body	Entity	Date	Signature
Board of Directors	GRUPO AZKOYEN, S.A.	September 2019	

1. Introduction

The purpose of this Whistleblower Channel Privacy Policy of "AZKOYEN S.A." (hereinafter, "**AZKOYEN**" or "**AZKOYEN GROUP**", and the "**Channel**") is to inform of the processing of personal data which, where appropriate, shall be carried out for managing and processing the complaints that may be lodged via said channel.

For the correct configuration and design of the Channel, AZKOYEN fully complies with the applicable data protection regulations, in particular with Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27th April 2016, concerning the protection of individuals in relation to data protection and the free movement of such data and the draft Organic Law on the Protection of Personal Data.

Similarly, the Whistleblower Channel has been designed in accordance with Legal Report 0128/2007, of the Spanish Data Protection Agency "Creating internal complaints systems in companies ("Whistleblowing" mechanisms), and with "Opinion 1/2006 on the application of the EU data protection rules to internal whistleblowing schemes in the fields of accounting and internal accounting controls, auditing matters, fight against bribery, banking and financial crime", of Article 29 of the European Commission's Working Group.

2. Data controller

The data controller is AZKOYEN, S.A., with address at Avda. San Silvestre, s/n, 31.350 Peralta, Navarre, Spain.

The contact of the Data Protection Officer can be obtained through the Support Unit or Chief Compliance Officer (the Human Capital Corporate Director), which you may contact for information on any matters concerning the processing of your data, as well as to exercise your legitimate rights, as detailed in section 6 "Exercise of Rights".

3. Processing of your personal data and authentication

Personal data gathered via the Whistleblower Channel shall be processed for the sole purpose of handling the complaints received and, where appropriate, for investigating the alleged facts.

Both the complainant and the accused party shall be duly informed, in each case, of the specific persons and bodies to which their data will be disclosed, especially as regards the possible non-disclosure to the accused of the complainant's identity.

The processing of data within the framework of the Whistleblower Channel will be carried out for the fulfilment of a mission carried out in the public interest, as the internal Whistleblower Channelaims to prevent and discover possible conducts that violate both current legal regulations and AZKOYEN's internal standards. These include in

particular those violations that are classified as offences that may lead to criminal liability on AZKOYEN's part due to the circumstances in which they occur. For the correct configuration and design of the Channel, AZKOYEN fully complies with the applicable data protection regulations, in particular with Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, concerning the protection of individuals in relation to data protection, the free movement of such data, and the draft Organic Law on the Protection of Personal Data.

4. Data retention period

Personal data that may be gathered as a result of lodging a complaint will initially be kept for the time necessary to decide on its acceptance for processing and investigation.

Therefore, when a complaint is deemed as inadmissible or initiating an investigation is concluded as inappropriate, the data included therein will be removed for AZKOYEN's system. On the other hand, if it is agreed that an investigation can be initiated, said data shall be processed for the duration of such investigation.

In any case, three months after the complaint is lodged the related data must be deleted, unless:

(a) Exceptionally, its conservation is necessary to continue conducting the investigation, in which case the data may continue to be processed by the Support Unit, the Audit Committee and the Board of Directors (where appropriate, by the bodies responsible for investigating the facts).

(b) After said three-month period has elapsed or the investigation has concluded, the Audit Committee agrees to its temporary blockade in order to make the data gathered available to the Courts and Tribunals, as may be necessary. In such a case, this blockade may not be agreed for a period exceeding five years.

5. Which recipients are informed of your data?

Where necessary or required, the data may be disclosed to those third parties who are legally entitled to access this data, such as public bodies, judges, and courts.

This data may also be accessed by third-party professionals that AZKOYEN may require to carry out the partial or total investigation of the complaints lodged. These professionals shall always act subject to a duty of secrecy and confidentiality.

6. Exercise of rights

The persons whose personal data is referred to in a complaint shall have the rights set out below, which, where appropriate, may be exercised under the terms and to the extent acknowledged by the current legislation at any time:

a) Such persons will have the right to obtain confirmation as to whether or not their personal data is being processed in AZKOYEN GROUP within the context of managing the Whistleblower Channel, and to request the rectification of inaccurate data, or, where appropriate, request its deletion, when, among other reasons, the data is no longer necessary for managing the Whistleblower Channel.

b) The right of access to their personal data. In respect of the accused party, this excludes the identity of the person who has lodged the complaint against them.

c) To revoke the consents granted, as well as to exercise the rights of access, rectification, deletion, opposition, limitation, portability and the right to not be subject to automated decisions, you may address a written request to the following address: Avenida San Silvestre, s/n. C.P. 31350 Peralta (Navarre-Spain) or by e-mail to the address responsableseguridad@azkoyen.com. The request must include: name and surname of the person concerned; copy of their National ID document, passport or other valid identification document and, as applicable, of their representative, as well as proof of the representation; address for the purpose of notifications and specification of the object of the request.

d) You may also claim before the Spanish Data Protection Agency (as such, the competent Data Protection Authority), especially when you have not obtained a satisfactory response in the exercise of your rights, by sending a written request to the Spanish Data Protection Agency, at C/ Jorge Juan, 6 28001-Madrid or through the website https://www.aepd.es

7. Principle of proportionality and minimisation of data

The personal data gathered in relation to the Whistleblower Channel:

- ✓ Shall be limited to those data strictly and objectively necessary to deal with complaints and, where appropriate, to check the reality of the alleged facts.
- ✓ Shall always be processed in accordance with the applicable data protection regulations, for legitimate and specific purposes in connection with the investigation that may arise as a result of the complaint.
- ✓ Shall not be used for incompatible purposes.
- ✓ Shall be appropriate and not exceed the above-mentioned purposes.

8. Limitation of access to the data

Access to the data stored in these systems will be limited only to internal and, exceptionally, to external bodies, which have a legal or contractual mandate to perform internal control and compliance functions.
Only when disciplinary actions against a worker can be taken, will AZKOYEN staff with human resources management and control functions be allowed to process the data.

9. Security and confidentiality measures

AZKOYEN shall ensure that all necessary technical and organisational measures are implemented to preserve the security of the data gathered to protect it from unauthorised disclosure or access.
To this end, AZKOYEN has taken appropriate measures to ensure the confidentiality of all data and will ensure that data relating to the identity of the complainant is not disclosed to the accused party during the investigation. Moreover, AZKOYEN will respect the fundamental rights of the individual, without prejudice to actions which, where appropriate, the competent judicial authorities may take.