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Title:					
Ethical Channel Privacy Policy					

Written by:	Global Legal Department		
Reviewed by:	Compliance and Business Ethics Committee		
Approved by:	Board of Directors		
Date of approval:		Effective date:	
Last review:		Next review:	2025

I. Introduction

In accordance with the provisions of European Regulation 2016/679 of April 27, 2016, on the protection of natural persons with regard to the processing of your personal data ("GDPR"), Organic Law 3/2018 of December 5, on the Protection of Personal Data and guarantee of digital rights ("LOPDGDD") and Law 2/2023, of February 20, regulating the protection of persons who report regulatory infringements and the fight against corruption ("Whistleblower Protection Act"), the purpose of this Policy is to provide information about the processing that will be given to personal data that will be entered in the TRADEBE Ethical Channel.


II. Related Documentation

Reference	Title
PO-GL-CL 05.01	Ethical Channel Usage Policy

III. Contact details of the Data Controller and the Data Protection Delegate

The different companies that make up TRADEBE shall be considered responsible for the processing of personal data derived from the use of the Ethical Channel and the processing of inquiries and internal investigations in accordance with this policy and with the provisions of the applicable regulations.

- The TRADEBE company in relation to which the consultation is made or the facts are reported and with which the informant has a direct relationship. The postal address of said company, for the purposes of personal data protection, is located at Av. Barcelona nº109, 5th floor, Sant Joan Despí, Barcelona, 08970 Spain.

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- Grupo Tradebe Medio Ambiente, S.L., the company to which the person in charge of the Ethical Channel belongs.

Company: GRUPO TRADEBE MEDIO AMBIENTE, S.L.

Registered office: Av. Barcelona nº 109, 5th floor, Sant Joan Despí (Barcelona), (08970) Spain

VAT number: ESB95229761

Telephone: +34 93 205 81 00


The informants and affected persons can contact the Data Protection Delegate through the following email address: privacidad@tradebe.com

IV. Type of personal data processed

The personal data that TRADEBE will process are those provided by the caller through the communication, as well as the rest of the data that may be collected as a result of the investigation that may be launched in accordance with the procedure indicated for TRADEBE's Ethical Channel. The following data, among others, will be processed:

- Identification data, such as name and surname, postal address, email address, telephone number of both the informant and those persons to whom the facts reported refer.
- Employment details (company, job position, among others) of the informant and/or of the persons to whom the reported facts refer.
- Relationship with TRADEBE
- Data, in any medium, that proves the infractions or non-compliances that are the object of the communication or complaint.

V. Purposes of data processing

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The personal data provided in the communication will be processed for the purpose of attending to and analyzing the communication, investigating the facts reported and taking the relevant corrective measures, whether disciplinary or contractual, in order to comply with TRADEBE's due diligence and control.

VI. Basis of legitimacy of the data processing

The processing of personal data of data subjects by TRADEBE is legitimate on the basis of public interest (Art. 6.1.e GDPR) and compliance with a legal obligation (Art. 6.1.c GDPR). The processing of special categories of personal data entering the Ethical Channel is lawful for reasons of essential public interest (Art. 9.2.g) of the GDPR.


VII. Data retention period in the Ethical Channel

The personal data of the person making the report and of all the parties involved will be kept in the Ethical Channel platform only for the time necessary to decide whether to initiate an investigation into the facts reported, which will never exceed three (3) months from the sending of the report. Once this maximum period has elapsed without an investigation having been initiated, the personal data of the Ethics Channel shall be deleted, unless the purpose of the conservation is to leave evidence of its operation, in which case it may only be kept in anonymized form.

If it is proven that the information provided or part of it is not truthful, it must be immediately deleted as soon as such circumstance becomes known, unless such untruthfulness may constitute a criminal offense, in which case the information will be kept for the necessary time during the legal proceedings.

VIII. Recipients of personal data

In general, access to the personal data contained in the Ethical Channel and its processing will be restricted to the Head of the Ethical Channel, the members of the Compliance and Business Ethics Committee, and/or the internal or external investigators (the latter as processors) that may be appointed. Likewise, when it is necessary to take disciplinary measures against TRADEBE personnel, such access shall also be granted to the Head of

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the Human Resources Department and, in the event of having to take legal measures, to the Legal Manager.

In any case, the data will not be transferred or made available in any other way to any third party, except to those service providers for the reception of reports in the channel and, where appropriate, management and conduct of investigations that may be necessary, which will not process the data for their own purposes in any event.

Notwithstanding the foregoing, the personal data of the complaints may be communicated to the security forces and bodies of the State, Judges or Courts, as well as any other competent body in case of being required in compliance with the legislation in force.


IX. International transfers

Some TRADEBE and external entities referenced above may be located outside the European Economic Area and may not provide a level of data protection comparable to that of the European Union. In such cases TRADEBE ensures that such transfer is carried out with adequate safeguards and always maintaining data security, using the most appropriate tools for international data transfer, such as Standard Contractual Clauses or any other relevant complementary measures. The content of the Standard Contractual Clauses can be consulted on the AEPD website: <https://www.aepd.es/es/derechos-y-deberes/cumple-tus-deberes/medidas-de-cumplimiento/transferencias-internacionales>

X. Rights

Rights of the reporter / informant: At any time the reporter / informant may exercise their rights of access (to their own personal data, but not those of other potential participants or affected by the investigation), rectification, deletion, opposition, limitation and portability with respect to the personal data provided, by mail to the address indicated or by email: privacidad@tradebe.com identifying themselves as a user of the Ethical Channel service, with the limits established in the applicable regulations.

Rights of the person involved in the reported facts: The right to be informed as soon as possible that he/she is involved in an investigation process, as a result of a communication related to him/her or his/her actions. The aforementioned communication will have the following minimum content: the body in charge of the management, the facts communicated, the rights to which he/she is entitled and the procedure for processing the report, as well as all the information relating to the processing of his/her data listed in the previous section. The right of access to the recorded data, except for the identity of the reporter and the personal

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data of other persons affected by the file, and the right to rectify any inaccurate or incomplete personal data. They shall also have the right to be informed of the resolution or closure of the alert, as the case may be. When the communication to the person involved in the communicated facts that he/she has been the subject of a report jeopardizes TRADEBE's ability to investigate or collect evidence effectively, due to the risk of destruction or alteration of evidence by the person affected by the communication, TRADEBE may delay such duty of information.

The person concerned by the facts communicated may exercise other rights provided for by the data protection regulations: deletion (in accordance with the time limits for the conservation of personal data provided for by the legislation in force), limitation and portability with respect to his/her personal data by sending a letter to the address indicated above or to the email address: privacidad@tradebe.com , identifying himself/herself as the person concerned by an internal investigation, provided that this is compatible with the success of the aforementioned investigation.

In case of considering their right to data protection violated, any of them may file a complaint with the Spanish Data Protection Agency (www.aepd.es).

XI. Review and update

This Policy will be reviewed and updated every two years.