

**Internal procedure for reporting and following up
on violations of the law at
Directio spółka z ograniczoną odpowiedzialnością**

§ 1.

Subject matter of the procedure

This procedure sets out the rules and procedure for reporting breaches of the law and taking follow-up actions in connection with these reports, including the protection of whistleblowers at Directio sp. z o.o. with its registered office in Warsaw, in accordance with the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws of 2024, item 928, hereinafter referred to as the "**Act**") and Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law (hereinafter "**Directive**").

§ 2.

Definitions

The terms used in the Procedure have the following meanings:

1. **Directio** – means Directio limited liability company with its registered office in Warsaw.
2. **Directive** – has the meaning given to it in § 1 section 1 of the Procedure.
3. **Follow-up** – means actions taken by Directio or a Public Authority to assess the accuracy of the information contained in the Notification and to prevent a breach of the law that is the subject of the Report, in particular by investigation, initiation of an inspection or administrative procedure, prosecution, action taken to recover funds or closure of a procedure carried out under a Procedure or procedure receiving External Reports and taking Follow-up;
4. **Retaliation** – means any direct or indirect act or omission (or attempt or threat of such act or omission) that occurs in a Work-Related Context, is caused by a Report or Public Disclosure and that violates or is likely to violate the rights of the Whistleblower or causes or is likely to cause unreasonable harm to the Whistleblower, including the unjustified initiation of proceedings against the Whistleblower;

5. **Information on a violation of law** – means information, including reasonable suspicion of an existing or potential violation of the law, which has occurred or is likely to occur in Directio or information regarding an attempt to conceal such a violation of the law.
6. **Feedback** – means the information provided to the Whistleblower about the planned or taken Follow-up Actions and the reasons for such actions.
7. **Reporting Committee** – means an internal unit consisting of persons appointed as members of the committee by the Management of Directio and authorized to receive Internal Reports and take Follow-up Actions, including conducting investigations.
8. **Work-Related Context** – means past, present or future activities related to the performance of work on the basis of an employment relationship or other legal relationship forming the basis for the provision of work or services, or the performance of functions within or for Directio, in the context of which information about the violation of the law has been obtained and there is an opportunity to experience Retaliation.
9. **Public Authority** – means supreme and central government administration bodies, local government administration bodies, local government units, other state bodies and other entities performing public administration tasks by virtue of law, competent to undertake Follow-up Actions in the areas indicated in Article 3(1) of the Act.
10. **Reporting Person** – means a natural person, legal person or organizational unit without legal personality, to whom the law grants legal capacity, indicated in the Report or Public Disclosure as a person who has committed a violation of the law, or as a person with whom the person who committed the violation is related.
11. **Reporting Aider** – means a natural person who assists a Whistleblower in a Reporting or Public Disclosure in a work-related Context and whose assistance should not be disclosed.
12. **Person associated with the Whistleblower** – means a natural person who may experience retaliation, including a co-worker or the closest person of the Whistleblower within the meaning of Article 115 § 11 of the Act of 6 June 1997 – the Penal Code (Journal of Laws of 2024, item 17).

13. **Public entity** – means an entity indicated in Article 3 of the Act of 11 August 2021 on open data and re-use of public sector information (Journal of Laws of 2023, item 1524)
14. **Employee** – means an employee within the meaning of Article 2 of the Act of 26 June 1974 Labour Code (i.e. Journal of Laws of 2023, item 1465, as amended) employed by Directio.
15. **Procedure** – means this procedure.
16. **Register** – means the register of Internal Reports.
17. **Whistleblower** – has the meaning given to him in § 3 section 1 of the Procedure.
18. **Public Disclosure** – means the disclosure of a Notice of Infringement of a Right to the Public.
19. **Act** – has the meaning given to it in § 1 section 1 of the Procedure.
20. **Reporting** – means an oral or written Internal Reporting or External Report, submitted in accordance with the requirements set out in the law.
21. **Anonymous Reporting** – means a Report made by an unidentified person.
22. **Internal Reporting** – means oral or written communication of a Notice of a violation of law to Directio.
23. **External report** – means oral or written communication of a violation of the law to the Ombudsman or a public authority.

§ 3.

Whistleblower

1. A whistleblower is an individual who reports (internally or externally) or discloses to the public information about a breach of law obtained in a Work-Related Context, including:
 - a. Employee and persons performing work on a basis other than an employment relationship, including based on a civil law contract or as part of the provision of temporary work.
 - b. persons performing functions in Directio's corporate structures or acting on behalf of and for Directio, including members of Directio's management board and proxies.

- c. any other person who is in any way connected with Directio, in particular: entrepreneurs, persons performing work under the supervision and direction of a contractor, subcontractor or supplier of Directio, interns, apprentices, or candidates applying for employment with Directio, if they have become aware of a violation of the law during the recruitment process or other processes prior to the establishment of an employment relationship.
2. From the moment of filing the Report, the Whistleblower is subject to the protection against Retaliation provided for in the Procedure, provided that the Whistleblower acted in good faith, i.e. had reasonable grounds to believe that the information being the subject of the Report was true at the time of making the Report and that it constitutes information about a violation of the law.

§ 4.

Scope of the procedure

1. The subject of the Notification may be acts or omissions that are illegal or aimed at circumventing the law:
 - a. corruption
 - b. procurement
 - c. financial services, products and markets
 - d. counteracting money laundering and terrorist financing
 - e. product safety and compliance with the requirements of the
 - f. transport safety
 - g. Environmental
 - h. radiation protection and nuclear safety
 - i. food and feed safety
 - j. animal health and welfare
 - k. public health
 - l. consumer protection
 - m. privacy and personal data protection
 - n. security of network and ICT systems

- o. financial interests of the State Treasury of the Republic of Poland, local government units and the European Union
 - p. internal market of the European Union, including public competition and state aid rules and corporate taxation
 - q. constitutional freedoms and rights of man and citizen – occurring in the relations of an individual with public authorities and not related to the areas indicated in letters a-p
- 2. A Report may also relate to a violation of internal policies or regulations of Directio, and such violations may only be the subject of an Internal Report.

§ 5.

Notification Committee

1. The Reporting Committee is authorised to receive Internal Reports, take Follow-up Actions, including verification of Internal Reports, consider them, investigate and contact the Whistleblower.
2. The members of the Notification Committee are appointed and dismissed by a resolution of the Directio Board. The Commission will be composed of 3 to 5 members.
3. The Members of the Commission shall in particular be required to:
 - a. impartiality when handling Internal Reports.
 - b. confidentiality of information to which they have been granted access in connection with the performance of obligations set out in the Procedure.
 - c. follow up with due diligence and without undue delay.
4. Internal reports may not be analysed by persons who are suspected on the basis of the content of the Report that they were in any way involved in the act or omission that is the subject of the Report.
5. In the event that an Internal Submission involves a member of the Submission Committee, that person will be removed from the matter and the Directio Board will appoint another person, unless the Board considers that the case can be handled by other persons who have not been excluded from the case.

6. In the event of circumstances affecting the impartiality of a member of the Reporting Committee, the person concerned, or another member of the Reporting Committee should request the management of Directio to exclude that person from the Reporting Committee. In this case, paragraphs 4 and 5 above shall apply.

§ 6.

Making Internal Reports

1. An internal application may be made by:
 - a. in writing via a dedicated form available on the website:
<https://directio.com/sygnalisci>;
 - b. in writing via a dedicated e-mail box: sygnalisci@directio.com;
 - c. orally during a direct meeting with a representative of the Reporting Committee, at the request of the Whistleblower submitted via one of the channels indicated in letters a or b above.
2. In the case referred to in paragraph 1(c) Above, an online or in-person meeting with the Whistleblower will be conducted within 14 days of submitting such a request. With the consent of the Whistleblower, such a meeting is documented by recording the conversation or drawing up minutes of the meeting, which can be checked, corrected and approved by the Whistleblower by signing it.
3. The internal report should include the following information:
 - a. Whistleblower's identification data.
 - b. Whistleblower's contact details (correspondence address or e-mail address)).
 - c. a description of the breach that the Whistleblower believes has occurred or is likely to occur, including:
 - i. the date and place of the infringement or the date and place where the Infringement Notice was obtained.
 - ii. description of the specific situation or circumstances indicating the possibility of a breach of.
 - iii. a description of the actual or potential consequences of the infringement.

- iv. data of the person/entity to which the Report relates (if the reporting person has such information)).
 - d. indication of possible witnesses to the infringement.
 - e. identification of all evidence and information available to the Whistleblower that gives him or her reason to believe that the Notice of Violation of the Law is true and that may be helpful during the investigation.
- 4. Immediately, no later than within 7 days, the Whistleblower will receive a message confirming receipt of the Internal Report by Directio, unless the Whistleblower has not provided a contact address to which the confirmation should be sent.

§ 7.

Making Anonymous Reports

1. It is possible to make an Internal Report anonymously in the form indicated in § 6 section 1 letters a. – b. Procedure.
2. A person making an Anonymous Report is not obliged to provide their data. However, you are encouraged to provide an anonymous email address or other contact details for feedback.
3. Anonymous reports are handled under this Procedure.
4. The Reporting Committee does not take any action to establish the identity of the Whistleblower. If, during the examination of an anonymous Report, the identity of the Whistleblower is identified and the Report meets the conditions set out in § 3 section 2, the Whistleblower is subject to the protection provided for in the Procedure and the Act.

§ 8.

Investigation and follow-up

1. Only members of the Reporting Committee have access to the reporting channels for Reporting Violations.
2. Immediately upon receipt of the Application, but no later than within 7 days from the date of receipt of the Application, the Notification Committee:

- a. sends the Whistleblower a confirmation of receipt of the Report (unless the Whistleblower has not provided a contact address to which the confirmation should be forwarded)).
 - b. performs a preliminary verification of the Application and determines whether the Application meets the conditions set out in the Procedure.
 - c. assesses the completeness of the Internal Report, analysing whether the data contained therein allows for the Follow-up, including the investigation. If an Internal Report is incomplete, a member of the Reporting Committee shall immediately (if possible) contact the person making the Report to complete the Report.
 - d. initiates an investigation if the Internal Report is recognizable (i.e. it has not been considered incomplete in accordance with paragraph 3 below).
3. The Reporting Committee may waive the investigation if the Report is incomplete or relates to issues not covered by this Procedure. Incompleteness means a situation that prevents further processing of the Report, i.e. the Report lacks relevant information and at the same time it is not possible to contact the reporting person, or it is not possible to complete the Report.
4. If necessary, a Reporting Committee will be called to discuss the subject matter of the Submission and to examine the evidence. Whenever expertise is required to process a Report, the Commission is entitled to consult with competent Employees or persons employed on any basis by Directio with appropriate competence or external advisors.
5. All actions taken during the investigation are documented.
6. The Reporting Committee draws up a report on the investigation, which also includes recommendations for possible follow-up, and submits it to the Directio Management Board.
7. The final decision on further Follow-up is made by the Board based on the report presented to it by the Notification Committee.
8. If, as a result of the investigation, the Reporting Committee finds the Internal Notification to be unfounded, the Commission closes the procedure without taking any further Follow-up Action.

9. The Reporting Committee will provide the Whistleblower with Feedback within 3 months from the date of confirmation of receipt of the Report, or if the confirmation of receipt of the Report is not provided – within 3 months and 7 days from the date of the Report (unless the Whistleblower has not provided a contact address).
10. The actions specified in this § 8 may be taken independently by each member of the Notification Committee.

§ 9.

Whistleblower protection

1. It is prohibited to disclose the identity of the Whistleblower except with their explicit consent.
2. Directio does not tolerate any Retaliation against a Whistleblower, or attempts or threats to do so, even if the Whistleblower Report was made in good faith and the investigation has shown that the reported breach did not occur or did not constitute a violation of law.
3. It is unacceptable to take retaliatory actions against the Whistleblower, consisting in particular of:
 - a. refusal to establish an employment relationship.
 - b. termination without notice of employment.
 - c. failure to conclude a fixed-term employment contract or an employment contract for an indefinite period after termination of a probationary employment contract, failure to conclude another fixed-term employment contract or failure to conclude an employment contract for an indefinite period after termination of a fixed-term employment contract – if the Whistleblower had a reasonable expectation, that such an agreement will be concluded with him.
 - d. reduction of remuneration for work.
 - e. suspension of promotion or omission from promotion.
 - f. omission of work-related benefits other than remuneration or reduction of the amount of these benefits.

- g. a transfer to a lower job position.
 - h. suspension from the performance of employee or official duties.
 - i. transferring the current duties of a Whistleblower to another Employee.
 - j. unfavourable change in the place of work or the distribution of working time.
 - k. negative evaluation of work performance or a negative opinion about work.
 - l. the imposition or application of a disciplinary measure, including a financial penalty, or a measure of a similar nature.
 - m. coercion, intimidation or exclusion.
 - n. mobbing.
 - o. discrimination.
 - p. adverse or unfair treatment of.
 - q. suspension of participation or omission from selection for participation in training to improve professional qualifications.
 - r. unjustified referral for medical examinations, including psychiatric examinations, unless separate regulations provide for the possibility of referring the Employee for such examinations.
 - s. an action aimed at making it more difficult to find a job in a given sector or industry in the future, on the basis of an informal or formal sectoral or sectoral agreement.
 - t. causing financial loss, including economic loss or loss of income.
 - u. causing other non-material damage, including infringement of personal rights, particularly the Whistleblower's good name.
4. If the work or services have been, are or are to be provided on the basis of a legal relationship other than an employment relationship constituting the basis for the provision of work or services or the performance of a function, section 3 above shall apply accordingly, unless the nature of the work or services provided or the function performed does not preclude the application of such action to the Whistleblower.
- Unacceptable Retaliation is also:

- a. termination of a contract to which the Whistleblower is a party, in particular regarding the sale or delivery of goods or provision of services, withdrawal from such contract or termination without notice.
 - b. imposition of an obligation or refusal to grant, restriction or withdrawal of an entitlement, particularly a concession, permit or concession.
- 5. Retaliation also includes attempts or threats to apply the measures specified in paragraphs 3 and 4 above.
- 6. Protection against Retaliation under the above conditions is also enjoyed by:
 - a. persons assisting in making a report and Persons associated with the Whistleblower.
 - b. legal persons or other organisational units assisting or associated with the Whistleblower, in particular owned or employing the Whistleblower.

§ 10.

Reporting false information

- 1. Submissions may only be made in good faith. A person who knowingly reports or discloses false information to the public does not enjoy protection and bears disciplinary, civil and criminal liability.
- 2. A person or legal entity (including Directio) that has suffered harm as a result of an informed False Disclosure or Public Disclosure shall be entitled to compensation or redress for infringement of personal rights from the person who made such Notification or Public Disclosure.
- 3. If the investigation shows that false information was deliberately provided in the Report or the truth was concealed, the person making the Report, who is an Employee, may be held liable for disciplinary action specified in the Labour Code. Such behavior may also be considered a serious breach of basic employee duties and as such may result in termination of the employment contract without notice.
- 4. If the person making the Report and Directio have entered into a civil law agreement, the finding of knowingly reporting false information may result in the termination of this agreement and the final termination of cooperation between the parties.

§ 11.

Registry

1. Each Internal Report (including an Anonymous Report) is entered in the Register, regardless of the further course of the investigation.
2. The Notification Committee is authorised to maintain the Register.
3. The register is kept in electronic form, in a manner that ensures the protection of personal data, including the identity of the Whistleblower and persons related to the case.
4. The register contains information about the:
 - a. Request number.
 - b. infringement of law.
 - c. personal data of the Whistleblower and the person to whom the report relates necessary to identify them (unless an anonymous Report has been made);
 - d. Whistleblower's contact address.
 - e. date of submission of the Entry.
 - f. Follow-up actions taken.
 - g. the date of completion of the case.
5. Personal data and other information in the Register are stored for a period of 3 years after the end of the calendar year in which the Follow-up Actions were completed or after the end of the proceedings initiated by these actions.

§ 12.

Information on Making External Submissions

1. A report of a breach falling within the scope described in § 4 section 1 of this Procedure may in any case be addressed to the Ombudsman or another public Authority and, where appropriate, to the institutions, bodies, offices or agencies of the European Union, without the need to apply this Procedure.
2. An External Report may be made without first making an Internal Report, however, if it is possible to remedy the violation of the law that is the subject of the Report within

Directio's organisational structure, Whistleblowers are encouraged to report a Breach of Law as part of an Internal Reporting.

3. An external application should contain the data described in § 6 section 4 of the Procedure.
4. External reporting may be made orally or in writing.
5. An external application in the form of a document may be made by:
 - a. in paper form – to the correspondence address indicated by the Ombudsman or the Public Authority receiving the Notification.
 - b. in electronic form – to the e-mail address or the address of the electronic inbox, or the address for electronic delivery indicated by the Ombudsman or the Public Authority receiving the Report, or via a dedicated online form or application indicated by the Public Authority as the appropriate application for submitting Reports in electronic form.
6. An oral report can be made by phone, electronic means of communication or in person. If the Applicant intends to make the Application in person, the applicant submits a request for a meeting, which will be organized within 14 days.
7. The Ombudsman or Public Authorities review and follow up on the External Report, depending on the scope of the Report. Confirmation of receipt of the Report is provided to the Whistleblower within 7 days. Feedback is provided to the Whistleblower within a period of no more than 3 months from the date of confirmation of receipt of the Report, and in particularly justified cases – within 6 months from that date.
8. If the Ombudsman or the Public Authorities determine that an institution, body, office or agency of the European Union is competent to take Follow-up Action, the Ombudsman or the Public Authorities shall forward the information contained in the Report to the Entities concerned without undue delay for further investigation.
9. Detailed rules and procedures for making External Reports, as well as information necessary for the correct submission of a Report, are specified by the Commissioner for Human Rights or another public authority authorized to receive External Reports and publish them on its website in the Public Information Bulletin. Up-to-date contact

details of the Ombudsman and Public Authorities are provided by Directio on the website <https://directio.com/sygnalisci>.

§ 13.

Personal data

1. Directio is the controller of the personal data obtained in connection with the receipt, verification of Submissions, taking Follow-up Actions and maintaining the Register.
2. The Whistleblower's personal data, which allow their identity to be determined, are not subject to disclosure to unauthorised persons, unless with the express consent of the Whistleblower. The above limitation does not apply if disclosure is a necessary and proportionate obligation under the law in connection with preparatory or court proceedings conducted by courts, including to guarantee the right of defence of the person to whom the report relates, e.g. at the request of the Police, prosecutor or court.
3. Upon receipt of the Request, Directio processes the personal data to the extent necessary to accept the Request or to take any follow-up action. Personal data that is not relevant to the processing of the Report will not be collected, and in the event of accidental collection, it will be deleted immediately. Deletion of this personal data will take place within 14 days from the moment it is determined that they are not relevant to the case.
4. The personal data processed in connection with the acceptance of the Notification or the Follow-up Action, as well as the documents related to the Report, are stored by Directio for a period of 3 years after the end of the calendar year in which the Notification was forwarded to the Public Authority competent to take the Follow-up Action, or after the completion of the proceedings initiated by these actions.
5. In the case referred to in paragraph 4 above, Directio deletes the personal data and destroys the documents related to the Entry after the expiry of the retention period.
6. Further information on the processing of personal data is available in Appendix 1 to the Procedure – information clause for the Whistleblower and in Appendix 2 to the Procedure – information clause for persons other than the Whistleblower.

§ 14.

Final provisions

1. The procedure has been established after consultation with the representatives of Directio Employees appointed in accordance with the procedure adopted by Directio.
2. The procedure enters into force within 7 days from the date of its announcement.
3. The procedure is made available to applicants under an employment relationship or other legal relationship forming the basis for the provision of work or services to Directio with the commencement of recruitment or negotiations prior to the conclusion of the contract.
4. In matters not regulated by this Procedure, the provisions of Polish law shall apply, in particular the Act.

Appendix No. 1 to the Internal Procedure for Reporting Violations of the Law and Taking Follow-Up Actions in Directio Limited Liability Company Information clause for the whistleblower

In connection with the entry into force of the provisions of the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws, item 928, hereinafter referred to as the "**Act**"), Directio sp. z. o.o. with its registered office in Warsaw, 39 Sienna Street, 00-121 Warsaw ("**Directio**") informs that as a legal entity within the meaning of the Act, it will process personal data of persons to whom an internal report relates ("**Whistleblower Report**"). and third parties indicated in such Notification or persons whose personal data are processed in connection with explanatory and follow-up proceedings, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**GDPR**").

1. Personal data administrator

The controller of the whistleblower's personal data is Directio.

2. Purposes and legal basis for the processing of personal data

Directio will process your personal data for the purposes of reported violations of law based on:

- Article 6(1)(c) of the GDPR – a legal obligation of the controller under the provisions of the Act, in particular Article 8(4) or Article 29 of the Act (in relation to the person to whom the report relates), covering the performance of tasks related to the handling of Reports.
- Article 6(1)(f) of the GDPR – legitimate interest of the controller, i.e. receiving, verifying Reports and conducting explanatory proceedings to the extent that the Notification concerns a violation of internal policies or regulations in force at Directio.

- Article 9(2)(g) of the GDPR – the necessity of processing for reasons related to important public interest under the Act, in particular Article 8(2) and (4) of the Act – in the case of processing of special category personal data.

3. Period of storage of personal data

Your personal data will be processed for a period of 3 years after the end of the calendar year in which the follow-up actions taken as a result of the Report were completed or after the end of the proceedings initiated by these actions.

If documents containing your personal data are/will be subject to administrative or court proceedings, the period of processing of such data may be correspondingly longer to the extent justified by the relevant provisions of law.

Personal data that is not relevant to the processing of the Report is not collected, and in the event of accidental collection, it is deleted immediately. Deletion of this personal data takes place within 14 days from the moment it is determined that they are not relevant to the case.

4. Recipients of personal data

The recipients of personal data will be public authorities competent to take follow-up actions (e.g. police, prosecutor's office) and processors to whom Directio has contractually entrusted the processing of personal data, including entities providing IT support services or external entities to whom activities related to proceedings conducted on the basis of Notifications have been delegated to the extent permitted by the Act, e.g. law firms. Directio ensures that these entities will protect your identity and will not disclose it without your consent.

Personal data will not be transferred to a third country or an international organization.

5. Source of personal data

We receive your personal data that we process directly from you. Providing personal data is voluntary, but it is necessary to handle the Request.

6. Automated decision-making, including profiling

Your personal data will not be subject to profiling and Directio will not make automated decisions about you based on this data.

7. Rights that you have in connection with the processing of personal data

You have the right to request access to your personal data, as well as to rectify it. You also have the right to request the deletion or restriction of processing, as well as to object to their processing (to the extent that the data is processed on the basis of a legitimate interest), but you are entitled to them only if further processing is not necessary for Directio to comply with a legal obligation and there are no other important legitimate grounds for processing, overriding your rights and interests.

If you consent to the disclosure of your identity or to the recording of an oral report, you may withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

If you believe that your personal data is processed unlawfully, you also have the right to lodge a complaint with the President of the Office for Personal Data Protection (address: 2 Stawki Street, 00-193 Warsaw)).

8. Contact

If you have any questions about how Directio uses your data, please contact the Data Protection Officer by e-mail at krzysztof.kunowski@directio.com or in writing to the address of Directio's registered office indicated above.

Appendix No. 2 to the Internal Procedure for Reporting Violations of the Law and Taking Follow-Up Actions in Directio Limited Liability Company Information clause for persons other than the whistleblower

In connection with the entry into force of the provisions of the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws, item 928, hereinafter referred to as the "**Act**"), Directio sp. z. o.o. with its registered office in Warsaw, 39 Sienna Street, 00-121 Warsaw ("**Directio**") informs that as a legal entity within the meaning of the Act, it will process personal data of persons to whom an internal report relates ("**Whistleblower Report**".) and third parties indicated in such Notification or persons whose personal data are processed in connection with explanatory and follow-up proceedings, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**GDPR**").

1. Personal data administrator

Directio is the administrator of the personal data of the persons to whom the Request relates, third parties indicated in the Notification and persons whose personal data is processed in connection with the handling of the Reports.

2. Purposes and legal basis for the processing of personal data

Directio will process your personal data for the purposes of reported violations of law on the basis of:

- Article 6(1)(c) of the GDPR – a legal obligation of the controller under the provisions of the Act, in particular Article 8(4) or Article 29 of the Act (in relation to the person to whom the report relates), covering the performance of tasks related to the handling of Reports.
- Article 6(1)(f) of the GDPR – legitimate interest of the controller, i.e. receiving, verifying Reports and conducting explanatory proceedings to the extent that the

Notification concerns a violation of internal policies or regulations in force at Directio.

- Article 9(2)(g) of the GDPR – the necessity of processing for reasons related to important public interest under the Act, in particular Article 8(2) of the Act – in the case of processing of special category personal data.

3. Categories of personal data processed

The categories of data that may be processed are:

- ordinary data, e.g. name and other personal data, or
- Special category data, e.g. information on health, philosophical beliefs, political opinions, etc.

indicated in the Report or obtained in the course of the investigation.

4. Period of storage of personal data

Your personal data will be processed for a period of 3 years after the end of the calendar year in which the follow-up actions taken as a result of the Report were completed or after the end of the proceedings initiated by these actions.

If documents containing your personal data are/will be subject to administrative or court proceedings, the period of processing of such data may be correspondingly longer to the extent justified by the relevant provisions of law.

Personal data that is not relevant to the processing of the Report is not collected, and in the event of accidental collection, it is deleted immediately. Deletion of this personal data takes place within 14 days from the moment it is determined that they are not relevant to the case.

5. Recipients of personal data

The recipients of personal data will be public authorities competent to take follow-up actions (e.g. police, prosecutor's office) and processors to whom Directio has contractually entrusted the processing of personal data, including entities providing IT support services or external entities to whom activities related to proceedings conducted on the basis of Notifications have been delegated to the extent permitted by the Act, e.g. law firms. Directio ensures that these entities will protect your identity and will not disclose it without your consent.

Personal data will not be transferred to a third country or an international organization.

6. Source of personal data

We receive your personal data indicated in the Report we process from the whistleblower or other person involved in the investigation.

7. Automated decision-making, including profiling

Your personal data will not be subject to profiling and Directio will not make automated decisions about you on the basis of this data.

8. Rights that you have in connection with the processing of personal data

You have the right to request access to your personal data, as well as to rectify it. You also have the right to request the deletion or restriction of processing, as well as to object to their processing (to the extent that the data is processed on the basis of a legitimate interest), but they are available only if further processing is not necessary for Directio to comply with a legal obligation and there are no other important legitimate grounds for processing, overriding your rights and interests.

If you consent to the disclosure of your identity or to the recording of an oral report, you may withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

If you believe that your personal data is processed unlawfully, you also have the right to lodge a complaint with the President of the Office for Personal Data Protection (address: 2 Stawki Street, 00-193 Warsaw)).

9. Contact

If you have any questions about how Directio uses your data, please contact the Data Protection Officer by e-mail at krzysztof.kunowski@directio.com or in writing to the address of Directio's registered office indicated above.