



Privacy Policy of the Internal Reporting System

We hereby inform you, in accordance with current data protection legislation, that Lyntia Networks, S.A.U (hereinafter, “Lyntia”) will process your data in order to manage any complaints made through the Internal Channel, in accordance with Act 2/2023, of 20 February, on the protection of persons who report breaches of regulations and the fight against corruption.

Who is the data controller?

The data controller for any personal information included in the information received via the Internal Channel will be Lyntia Networks, S.A.U with registered office on Avenida de Bruselas 24, Planta 1, 28108 Alcobendas.

Contact details of the Data Protection Officer: protecciondedatos@lyntia.com

What is the purpose of processing your data?

Your data will be processed in order to manage any complaints received relating to the material scope of the Internal Channel, to investigate the actions reported and to take any appropriate measures within the framework of current legislation in this respect.

Likewise, please be informed that we will obtain any data provided to us via the Channel or via third parties in the event of public disclosure, and where appropriate, we will process the information contained in said disclosure.

The category of the data processed in order to manage the Internal Channel will be identifying information and contact details, voice and any other kinds of data provided by those making contact through this channel.

How long do we keep the data?

We keep your data for a maximum of three months from the date they are entered on the Internal Channel. Additionally, they may be retained for a further three months in particularly complex cases. In no case may the data be retained for a period of more than ten years in the corresponding log book. However, under exceptional circumstances, the company reserves the possibility, for the purposes of exercising its right of defence with all guarantees, of keeping case files, duly blocked, for a maximum period equivalent to the limitation period applicable for the criminal or administrative offence reported.

Legal basis for processing your data

The legal basis for processing the data contained in internal communications is a legal obligation arising from Article 6.1.c of the GDPR by virtue of Act 2/2023, of 20 February, on the protection of persons who report breaches of regulations and the fight against corruption.

In the event of public disclosure, the legal basis for the processing will be to perform a task carried out in the public interest, as provided for in Article 6.1.e of the GDPR. We will ask for your consent where necessary in compliance with Act 2/2023, of 20 February, on the protection of persons who report breaches of regulations and the fight against corruption.

Any information received that contains data considered to be of a special category shall be deleted immediately without said data being recorded or processed, provided it is not required to carry out



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the investigation and unless the processing is necessary for reasons of substantial public interest, in accordance with Article 9.2.g of the GDPR.

To whom do we disclose your data?

The personal data held on the Internal Channel is not disclosed to any third parties except when legally required. The data shall be processed confidentially except when it is provided anonymously, in which case no personal data will be processed.

However, for the proper management of the Internal Channel, it shall be lawful for data to be processed by other persons, including disclosure to third parties, when this is necessary to adopt corrective measures or, where applicable, to impose sanctions or undertake criminal procedures.

Apart from the above-mentioned data disclosures, please be advised that Lyntia works in collaboration with third party service providers who have access to your personal data and who process said data on behalf of the data controller as a consequence of the provision of their services for the Internal Channel. To this end, it establishes strict criteria for the selection of service providers to ensure compliance with data protection obligations and undertakes to sign a data processing contract with them, in accordance with Article 28 of the GDPR.

Information of interest to whistleblowers

- Lyntia shall ensure respect for the right to honour and compliance with the non-retaliation commitment when information is reported in good faith.
- Please be advised that the confidentiality of the information you disclose shall be guaranteed at all times in accordance with best practices and current legislation.
- Any data listed in the recording of irregularities/breaches shall be processed confidentially and shall be held on the Internal Channel for the time strictly necessary for the formalities related to the required investigative actions.
- Personal data shall be included on the Internal Channel only for the purposes of investigating the complaint. The data shall be removed from the Channel once said investigation is completed and always within the time limit established by law. Once this time period has passed, your data shall be deleted from the Channel or shall be anonymised if the complaint is used to guarantee the operation of the crime prevention model.

You may exercise your rights of access, to rectification, to erasure, to object, to restrict processing, to portability, and to withdraw your consent and not be subject to automated individual decision-making by sending an email to protecciondedatos@lyntia.com



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Furthermore, if you believe your privacy rights have been breached, you may file a claim with the Spanish Data Protection Agency (www.aepd.es/en).