

## Processing of the data of the parties involved in the Internal Whistleblower Channel

Basic information about Data Protection	
<b>Responsible:</b>	SCHNELLECKE LOGISTICS ESPAÑA S.A.
<b>Purpose:</b>	Internal Information System Management - Whistleblowing Channel
<b>Legitimation:</b>	<ul style="list-style-type: none"> <li>Compliance with a legal obligation: Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption (TITLE VI Protection of personal data; Art. 29 and 30).</li> <li>Consent of the data subject: For the storage and recording of reports made via telephone line and voice messaging systems with recording; as well as for the recording of the personal meeting requested with the entity for the purpose of reporting. (Directive (EU) 2019/1937; art. 18.2 and 4) (Law 2/2023 Art. 7.2).</li> </ul>
<b>Addressees:</b>	It is foreseen that data will be transferred to: State Security Forces and Corps; Jurisdictional Bodies; Public Prosecutor's Office.
<b>Rights:</b>	You have the right to access, rectify and delete the data, as well as other rights, indicated in the additional information, which you can exercise in the form created for this purpose on our website <a href="https://sle.schnellecke.es/">https://sle.schnellecke.es/</a> "Exercise of ArSol Rights".
<b>Source:</b>	From the complaint submitted by the interested parties who: <ul style="list-style-type: none"> <li>Maintain an employment, commercial and service provision relationship with the entity.</li> <li>Work for subcontractors and suppliers of the entity.</li> <li>Are members of the corporate and administrative bodies.</li> </ul>
<b>Additional information:</b>	Additional detailed information on Data Protection can be found here: <a href="https://sle.schnellecke.es/politica-de-privacidad/">https://sle.schnellecke.es/politica-de-privacidad/</a>

## **Complete information on Data Protection Whistleblowing Channel of SCHNELLECKE LOGISTICS ESPAÑA S.A.**

### **1. Introduction**

The purpose of this Privacy Policy of the Whistleblowing Channel of **SCHNELLECKE LOGISTICS ESPAÑA S.A.** (hereinafter **SCHNELLECKE LOGISTICS ESPAÑA**), is to inform of the processing of personal data that, where appropriate, will be carried out for the management and processing of complaints that may be submitted through the same.

For the correct configuration and design of the Channel, SCHNELLECKE LOGISTICS ESPAÑA fully complies with the regulations emanating from Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption, as well as the applicable regulations on data protection, both European (Regulation (EU) 2016/679) and Spanish (Organic Law 3/2018 on the Protection of Personal Data and Guarantee of Digital Rights and Organic Law 7/2021, of 26 May, on the protection of personal data processed for the purposes of the prevention, detection, investigation and prosecution of criminal offences and the execution of criminal penalties).

### **2. Data Controller**

The Data Controller is **SCHNELLECKE LOGISTICS ESPAÑA S.A.**, with NIF A31627417 and with address POLIGONO INDUSTRIAL ARAZURI-ORCOYEN, CALLE D 6, 31170 ARAZUR, NAVARRA (ESPAÑA). The contact of the Data Protection Delegate is [dpo@gfmservicios.com](mailto:dpo@gfmservicios.com), who can be contacted for any question relating to the processing of your data, as well as for the exercise of your legitimate rights, as detailed in the corresponding section of this document.

### **3. Processing of your personal data and legitimization**

The personal data collected in the Whistleblowing Channel will be processed for the sole purpose of processing the complaints received and, where appropriate, investigating the facts reported, and inform the competent authorities as appropriate.

The processing of data within the framework of the Whistleblowing Channel will be carried out in order to comply with a legal obligation under the provisions of Articles 6.1. c) of Regulation (EU) 2016/679, 8 of Organic Law 3/2018, of 5 December, and 11 of Organic Law 7/2021, of 26 May, such as the management of a Whistleblowing Channel whose objective is the prevention and discovery of regulatory breaches of both the current legal regulations and the internal regulations of SCHNELLECKE LOGISTICS ESPAÑA, and the fight against corruption; including, and especially, those classified as crimes that could lead to the criminal liability of SCHNELLECKE LOGISTICS ESPAÑA.

### **4. Preservation time of your data**

The personal data that may be collected as a result of the lodging of a complaint will be kept, initially, for the time necessary to decide on its admission for processing and investigation. Therefore, when it is agreed that the complaint is not admissible for processing or it is concluded that it is not appropriate to initiate an investigation, the data included in it will be deleted from the system. SCHNELLECKE LOGISTICS ESPAÑA system and the complainant will

be informed of this in a reasoned manner. On the other hand, if it is agreed that an investigation should be initiated, or in the event that the untruthfulness of the complaint may constitute a criminal offence, said data will be processed for the duration of the investigation. In any case, after three months from the lodging of the complaint, the data must be deleted, unless:

- Their preservation is necessary for the continuation of the investigation, in which case they may continue to be processed by the I.R. and the Internal Body in charge of the investigation of the facts.
- After this three-month period has elapsed, or after such an investigation has been completed, the I.R. and the Internal Body in charge may decide to temporarily block it in order to make the data they have collected available to the Courts and Tribunals, Public Prosecutor's Office and competent Administrations.

## **5. Addressees**

To which recipients will your data be communicated? The identity of the informants and of those who make a public disclosure will at all times and in all cases remain confidential and will not be communicated to the persons to whom the facts reported relate or to third parties.

In case it is necessary or so required, the data may be communicated to those third parties to whom it is legally obliged to provide them, such as Public Bodies and Administrations, Courts and Tribunals. The aforementioned data may also be accessed, previously anonymised, by third party professionals to whom SCHNELLECKE LOGISTICS ESPAÑA may resort to carry out all or part of the tasks of instruction and investigation of the complaints presented, professionals who will act at all times subject to a duty of secrecy, reserve and confidentiality..

## **6. Exercise of rights**

Individuals to whom personal data included in a complaint relate may exercise the rights referred to in Articles 15 to 22 of Regulation (EU) 2016/679, as listed below:

- a) You will have the right to obtain confirmation as to whether or not SCHNELLECKE LOGISTICS ESPAÑA is processing your personal data in the context of the management of the Whistleblowing Channel, as well as to request the rectification of inaccurate data or, where appropriate, to request its deletion, when, among other reasons, the data is no longer necessary for the management of the Whistleblowing Channel.
- b) The right of access to his or her personal data, excluding, in respect of the defendant, the identity of the person who has lodged the complaint against him or her.
- c) To revoke the consents granted, as well as to exercise the rights of access, rectification, cancellation, opposition, limitation, portability and the right not to be subject to automated decisions, which may be exercised through the web form created for this purpose at <https://sle.schnellecke.es/>, by clicking on the link "**Exercise of ArSol Rights**". The request must include: name and surname(s) of the interested party; copy of their

National Identity Document, or other valid identification document and, if applicable, of their representative, as well as proof of representation; address for notification purposes and specification of the right to be exercised.

- d) You may also complain to the Spanish Data Protection Agency (as the competent Data Protection Supervisory Authority), especially when you have not obtained satisfaction in the exercise of your rights, by writing to the Agency at its headquarters at C/ Jorge Juan, 6 28001-Madrid or via the website <https://www.aepd.es>.

## **7. Principle of proportionality and data minimisation**

Personal data collected in the framework of the Whistleblowing Channel:

- ✓ They will be limited to those strictly and objectively necessary to process and manage complaints; any non-essential data that may be provided will be immediately deleted and will not be recorded in the system.
- ✓ They will be processed at all times in accordance with applicable data protection regulations, for legitimate and specific purposes in connection with the investigation that may arise as a result of the complaint.
- ✓ They shall not be used for incompatible purposes.

## **8. Limiting access to data**

Access to the data contained in these systems will be limited exclusively to the I.R. and the Internal Body and, exceptionally, third party professionals to whom SCHNELLECKE LOGISTICS ESPAÑA may resort to carry out all or part of the work of investigation and investigation of complaints subject, as processors, to the corresponding confidentiality agreement as stated in art. 28 of the RGPD EU 2016/679. Only when the adoption of disciplinary measures against an employee could proceed, the processing of the data will be allowed to the person in charge of SCHNELLECKE LOGISTICS ESPAÑA with functions of management and control of human resources.

## **9. Security and confidentiality measures**

SCHNELLECKE LOGISTICS ESPAÑA will ensure that all necessary technical and organisational measures are taken to preserve the security of the data collected in order to protect them from unauthorised disclosure or access. To this end, SCHNELLECKE LOGISTICS ESPAÑA has adopted appropriate measures to guarantee the confidentiality of all data and will ensure that the data relating to the identity of the complainant will not be disclosed to the respondent during the investigation, respecting in all cases the fundamental rights of the individual, without prejudice to the actions that, where appropriate, may be taken by the competent judicial authorities.