



PRIVACY NOTICE FOR PERSONAL DATA PROCESSING IN THE FRAMEWORK OF SUBMITTING REPORTS UNDER LAW 4990/2022 (WHISTLEBLOWING)

A. GENERAL

This privacy notice of the Data Controller (hereinafter Company) with details:

AIGLON ABEE
240-242 Kifisias Ave.
Chalandri 15231
+30 210 6700000
info@sgautomotive.gr

is addressed to natural persons whose data is processed in the context of the management of Reports pursuant to Law 4990/2022 (Protection of persons who report violations of EU law - Incorporation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 and other emergency settings).

B. NECESSITY-PURPOSE OF DATA PROCESSING

Any processing of personal data, which takes place in the context of the implementation of Law 4990/2022, is carried out to fulfil the obligation to establish reporting channels and take the necessary measures for their monitoring. The concept of the above processing of personal data includes any information related to violations in the context of Internal and External Reports, including their exchange or transmission.

The necessity of processing arises from the requirement to ensure that Reports are accurate and contain all the necessary information to be effectively investigated, that data processing ensures the protection of Reporting Persons from retaliation, as well as the confidentiality of Reports. With the aim of ensuring transparency and strengthening the protection of individuals who report violations (Reporting Persons), the Company has created an integrated system for protecting the personal data.

Any processing of personal data pursuant to Law 4990/2022, including the exchange or transmission of personal data by the competent authorities, is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, for the protection of natural persons against the processing of personal data and for the free movement of such data and the repeal of Directive 95/46/EC (General Data Protection Regulation - GDPR) and the Hellenic Law 4624/2019, subject to more specific provisions of Law 4990/2022 and other relevant regulations, regarding the processing of personal data by the competent authorities.

In the context of its regulatory compliance, corporate governance and improvement of the organizational culture, the Company has established and implements an Internal Reports - Disclosures Policy, which has been posted on the Company's website and is accessible via the link:

<https://www.sgautomotive.gr/whistleblowing/>

C. COLLECTION AND PROCESSING OF PERSONAL DATA

Every natural person reserves the right to submit a Report for any violation of EU law that comes to his/her attention by sending a postal letter to the Company's Report Receiving and Monitoring Officer at the address:

AIGLON ABEE

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APPROVAL:
2024



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marked "PERSONAL AND CONFIDENTIAL - for the attention of the Report Receiving and Monitoring Officer (Υ.Π.Π.Α.)".

Also, every natural person reserves the right to submit a report/complaint for any violation of EU law, which falls under his/her understanding in the following ways:

- Through an electronic platform, which operates on the Company's website, and which can be accessed via the link: <https://www.sgautomotive.gr/whistleblowing/>
- Verbally during a personal meeting or telephone communication with Officer Υ.Π.Π.Α.. of the Company within a reasonable period of time at the Reporting Person's request.
- By sending an e-mail to whistleblowing@sgautomotive.gr.

The personal data, which may be contained in the Reports, include but is not limited to:

- Name of the Reporting Person.
- E-mail address (e-mail) of the Reporting Person.
- Telephone number of the Reporting Person.
- Opinion(s) of the Reporting Person regarding the Report.
- Name(s) of natural person(s) against whom(s) a Report is being submitted (concerned Person).
- Other contact details of the concerned Person(s).
- Position(s) of the involved Person(s).
- Specific details (possibly with criminal information) relevant to the Report.
- Personal data of third parties (e.g., witnesses), which may be invoked by the Reporting Person.

In the context of the submission of a Report, only the absolutely necessary data is collected by the Company. Personal data, which obviously is not related to the handling of a Report, or is excessive, either is not collected, or if been collected accidentally, is deleted without delay. Reports can also be submitted anonymously. In any case, the Υ.Π.Π.Α. of the Company will forward the Report to the Company's Report Management Committee. If the Report Management Committee determines that a Report should be investigated further, other data may be collected during the investigation stage (e.g., from witnesses).

Every natural person has the right to submit an External Report for any violation of EU law that comes to their attention to the National Transparency Authority in accordance with art. 11 and 12 of Law 4990/2022, if he/she reasonably considers that the Report is not effectively managed by the Company, or there is a risk of retaliation. Instructions regarding the process of submitting an External Report to the National Transparency Authority are posted on its website (www.aead.gr).

D. LEGAL BASIS OF THE PROCESSING

The processing of personal data in the context of the application of Law 4990/2022 is primarily based on the provisions of GDPR art. 6, par.1(c), i.e., "the processing is necessary to comply with a legal obligation of the Controller". Also, the personal data of the Data Subjects involved is processed if this is necessary to safeguard the legitimate interests of the Company or the third party (GDPR art. 6, par. 1(f)). Such legitimate interests of the Company are the prevention and detection of violations in the Company, the verification of the legality of internal processes and the safeguarding of the integrity of the Company.



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E. SECURITY OF PROCESSING

Personal data is protected from misuse and unauthorized access through technical and organizational security measures implemented by the Company. In addition, personal data and any kind of information that leads, directly or indirectly, to the identification of the Reporting Person, is not disclosed to anyone other than the authorized persons of the Company, who are competent to receive, or monitor and manage the Internal Reports, except if the Reporting Person agrees. To this end, the Company takes the appropriate technical and organizational security measures when monitoring the Internal Report and communicating with the other departments of the Company or with the competent authorities.

Access is maintained by the Reporting Person to the Report that he/she has submitted, as well as access is granted to the administrators of each Report, which are appointed by the Company. In particular, the Υ.Π.Π.Α. of the Company has access to personal data. The Υ.Π.Π.Α. of the Company ensures the confidentiality and protection of personal data of the Reporting Person as well as any third party named in the Report, preventing access by unauthorized persons, unless the Reporting Person has given his/her express consent to reveal his/her identity or the Report is proven to be malicious. If the Report is proven to be malicious and, if there is a relevant request from the Person concerned, the identity of the Reporting Person can be disclosed, in order for the Person concerned to exercise his legal rights. Only those involved in the management and investigation of the Reports, i.e., the Report Management Committee and the legal representatives to whom the further legal investigation of the Report may be assigned, have access to the rest of the personal data included in the Reports (of the Persons concerned and witnesses). Natural persons can refer for more details to the Whistleblowing Policy posted on the Company's website.

F. RECIPIENTS OF DATA

The Report may be forwarded pseudonymized regarding the Reporting Person to other competent supervisory authorities referred to in Law 4990/2022, (e.g., Financial Crimes Prosecutor and in general the Prosecutorial Authorities, the Competition Commission, the Data Protection Authority, The Anti-Money Laundering and Countering the Financing of Terrorism Authority, etc.). More generally, data may be transmitted on a case-by-case basis to the competent supervisory and investigative authorities in the context of administrative, civil and criminal investigations and proceedings. In case the Υ.Π.Π.Α. of the Company or the Reports Management Committee the Company, request, during the execution of their duties, provision of external advice by advisory bodies or third party recipients, who may be external partners working with the Company to investigate the Reports, then they provide them only with the information necessary to establish the validity of the submitted Report, in compliance with the provisions of this privacy notice.

G. RETENTION OF DATA

The personal data processed in relation to the submitted Reports is kept for ten (10) years from the completion of any investigation or legal process, which has been initiated as a consequence of the Report against the Reporting Person, the Person concerned or any other third party.

H. RIGHTS OF DATA SUBJECTS

With the applicable legislative framework on personal data protection and the more specific application requirements of Law 4990/2022, the following rights of Data Subjects are recognized and guaranteed:

- Right to information (art. 12, 13, 14 of GDPR) under the conditions of the applicable legislation.



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- Right of access (art. 15 of GDPR) to personal data that has been processed from the application.
- Right to rectification (art. 16 of GDPR) of inaccurate personal information, which has been entered into processed by the application.
- Right to deletion (art. 17 of GDPR) of personal data, which have been processed by the application subject to the reservations and limitations of the applicable legislation.
- Right to restrict the processing of personal data (art. 18 of GDPR) under conditions of the current legislation.
- Right to object (art. 21 of GDPR) to the processing of personal data under reservations and the limitations of the applicable legislation.

However, it should be noted that according to art. 15 of Law 4990/2022, art. 23 of the GDPR and the national legislation on the protection of personal data (Law 4624/2019), the Company may not provide relevant information: (a) about the processing of personal data to the concerned Person, and to any third party (as Data Subject), named in the Report, or (b) for the processing of personal data, resulting from monitoring measures and in particular for the source of origin, for as long as necessary and if deemed necessary for the purposes of preventing and dealing with attempts to obstruct the Report, obstructing or thwarting or delaying monitoring measures, or attempts to identify the Reporting Person as well as to protect him/her against retaliation. It is also clarified that the rights of access, correction, deletion, portability, restriction and opposition to processing, when exercised by the concerned Person or by third parties named in the Report or resulting from monitoring measures, are also limited in accordance with the above.

It is clarified that the persons included in the reports have the right to be informed immediately about the offense for which they are accused, about the people who have access to the data included in the Report and about the right to be summoned to an apology. However, if there is a serious risk that the above information could hinder the investigation of the case and the collection of the necessary evidence, informing the persons included in the Report may be postponed until this risk ceases to exist. The identity of the Reporting Person remains confidential. Exceptionally, if the Report is proven to be malicious, and if the concerned Person requests it, he/she can be informed about the identity of the Reporting Person, in order to exercise his legal rights. It is noted that reports which are proven to be clearly malicious will be further investigated at the discretion of the Company both in terms of motives and those involved, in order to restore order by any legal means and means. The provisions of art. 22 of the GDPR (Automated individual decision-making, including profiling) do not apply, since no type of automated processing, including profiling, is carried out, which produces legal results for the Data Subjects, concerning them or significantly affecting them in a similar way. Data Subjects can exercise their rights by completing the relevant Rights Exercise Form, which is posted on the Company's website and sending it to.

AIGLON ABEE
240-242 Kifisias Ave.
Chalandri 15231
+30 210 6700000
Attn: DATA PROTECTION OFFICER
dpo@sigr.org

The Company is committed to respond to your request within one month following its receipt. However, if it is not possible to satisfy your request within the period of one month, we will inform you of the reasons for the delay.

If you have exercised some or all of your rights regarding data protection and you still feel that your concerns about the way we process your personal data have not been duly addressed by the Company, you have the



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right to submit a complaint to the Hellenic Data Protection Authority, Kifissias 1-3, PC 115 23, Athens. On the relevant website (<http://www.dpa.gr>) you will find information on how to submit complaints.

I. CHANGES TO THIS NOTICE

We may change or amend this Notice from time to time, and we will accordingly amend the revision date indicated at the end of this notice. We recommend that you review this Notice periodically so that you are always aware of the way we process and protect your personal data.

Note:

Date of latest revision: 06/06/2024.