

INFORMATION NOTICE ON PERSONAL DATA PROCESSING - WHISTLEBLOWING (TIS GREECE)

Pursuant to Article 13 of Regulation (EU) No. 2016/679 (GDPR) and applicable Greek national legislation on whistleblowing (implementation of Directive (EU) 2019/1937), TI SPARKLE GREECE SINGLE MEMBER SOCIETE ANONYME FOR THE PROVISION OF TELECOMMUNICATION SERVICES (“TIS Greece”) provides the following information on the processing of personal data carried out in relation to the management of Reports, governed by the TIS Greece Whistleblowing Procedure.

1) Categories of personal data

- Common personal data pursuant to Article 4, point 1, GDPR of the Reporting Party (in the case of non-anonymous Reports) as well as of any Persons involved or mentioned in the Report and Facilitators (“Data Subjects”), such as: personal data (e.g., name, surname, date and place of birth), contact details (e.g., telephone number, postal address, email address);
- Special categories of data pursuant to Article 9 GDPR, if included in the Report.

2) Purpose of processing and related legal basis

Personal data is processed for:

- management of the Report pursuant to applicable legislation; - fulfillment of obligations established by law or EU legislation; - defense or establishment of a right in civil, administrative, or criminal litigation. The legal basis for the processing is: - fulfillment of a legal obligation (Article 6, paragraph 1, letter c GDPR);
- the consent of the Reporting Party, where required for recorded or oral reports (Article 6, paragraph 1, letter a) of the GDPR); - the legitimate interest of the Data Controller (Article 6, paragraph 1, letter f) of the GDPR). Providing the data is necessary; failure to provide it or providing it incorrectly may make it impossible to process the Report.

3) Retention of personal data.

TIS Greece retains the data in accordance with applicable law, for the time necessary to manage the Report and in any case no longer than 5 years after notification of the final outcome. Personal data that is not useful for processing is not collected or, if collected, is promptly deleted.

4) Methods and logic of processing.

Data processing is carried out manually and/or using IT and electronic tools with logic related to the purposes indicated above, ensuring security and confidentiality. The Report management system guarantees, at every stage, the confidentiality of the identity of the Reporting Party, the Persons involved, and the content of the Report.

5) Data Controller, Security Officer, and Authorized Persons

The Data Controller is TI SPARKLE GREECE SINGLE MEMBER SOCIETE ANONYME FOR THE PROVISION OF TELECOMMUNICATION SERVICES, based in Athens, Greece 39 Ermou str. - 14 452 Municipality of Metamorfosis, ATHENS (Greece).

The Security Officer can be contacted for any reports via email: michalis.koutselakis@tisparkle.com Reports are handled by the relevant internal structures (e.g., the Whistleblowing Committee), whose members are authorized to process data and have been adequately trained.

For the operational management of Reports, TIS Greece may avail itself of the support of Group functions or external suppliers appointed as Data Processors.

6) Categories of third parties to whom the data may be communicated

Some processing may be carried out by Group companies, including in EU or non-EU countries; in this case, the transfers are carried out in compliance with Articles 44-49 of the GDPR. Other entities may process the data as independent Data Controllers or Data Processors, including: - consultants (organization, litigation, law firms); - auditing firms; - service companies; - public authorities, judicial authorities, and police forces.

7) Rights of data subjects

Data subjects may exercise the rights provided for in Articles 15-22 of the GDPR (access, rectification, erasure, restriction, portability, and objection) by writing to the Security Officer.

A complaint may be lodged with the Hellenic Data Protection Authority. These rights may be limited in cases provided for by law in order to guarantee the confidentiality of the whistleblower's identity.

TI SPARKLE GREECE SINGLE MEMBER SOCIETE ANONYME FOR THE PROVISION OF TELECOMMUNICATION SERVICES