

INFORMATION ON THE PROCESSING OF PERSONAL DATA

SEST-LUVE-POLSKA sp. z o.o. zo.o., hereinafter also referred to as the "Company" or within the meaning of Regulation (EU) 2016/679 (General Data Protection Regulation – "GDPR"), the "Data Controller", hereby provides you with information on the processing of your personal data in connection with the management of reports regulated by the "Procedure for reporting irregularities in the application of the principles and Code of Ethics" LU-VE Group", hereinafter also referred to as the "Procedure", and within the framework of the Company's "Internal Whistleblowing Assessment Process", hereinafter also referred to as the "Process".

Purpose and legal basis of processing

Your personal data is processed for purposes related to the application of the Procedure and the Process in order to fulfil the obligations set out in the national legislation, regulations or EU regulations in this respect, as well as in order to pursue the legitimate interests of the Data Controller (in particular to establish, pursue or defend against claims and participation in proceedings conducted on the basis of legal provisions by or before public authorities) - pursuant to Article 6(1)(c) of the GDPR, as well as Article 6(1)(f) of the GDPR.

Providing data is voluntary, but necessary to perform all activities resulting from legal obligations, therefore refusal to provide them in whole or in part may make it impossible to manage the received applications or may have other consequences provided for by law, including the inability to achieve the purposes for which the data is processed.

Period of storage of personal data

The Company will retain, in accordance with confidentiality requirements, your personal data for the period deemed necessary to process the Report, and in any event no longer than three years from the end of the year in which the final outcome of the Report was communicated – and where the data is or may be evidence in pending proceedings – until the date of the final conclusion of these proceedings – subject to the obligation of confidentiality.

Personal data that is manifestly not useful for processing a specific request will not be processed and, in the event of accidental collection, will be deleted immediately (at the latest within 14 days from the time it becomes known that it is not suitable for processing the request).

Data processing methods

All processing of personal data must be carried out in accordance with the GDPR and the Act of 10 May 2018 on the protection of personal data (Journal of Laws 2019.1781).

The processing of the data is carried out manually (e.g. in paper form) and/or by automated tools (e.g. by means of procedures and/or electronic media), following the logic associated with the purposes indicated above, and in any case in such a way as to guarantee the security and confidentiality of the data. The whistleblowing system ensures at every stage the confidentiality of the content of the report (including information about third parties that may be mentioned in the report) and the identity of the whistleblower, the persons involved, the persons named in the report and the person assisting in making the report, including through the use of encrypted communication.

Data Controller and DPO

The administrator of your data is SEST-LUVE-POLSKA sp. z o.o. z o.o., with its registered office at Wyczółkowskiego 30, 44-109 Gliwice (Poland), which can be contacted at the following e-mail address: privacy.luve@luvegroup.com.

The Data Protection Officer is Mr. Marco Vanzo- Unindustria Servizi & Formazione Treviso Pordenone S.c.a.r.l., who can be contacted at the following email address: dpo.luve@luvegroup.com.

This information complements the navigation policy of the website, in order to illustrate to the User how the Data Controller will specifically process the data entered in this contact form, so we invite you to read our privacy policy at the following link:

<https://exchangers.luvegroup.com/cms/view/home/privacy/s4/c1768>

Third parties who may access data as data processors

Some types of processing of your personal data may be carried out by third parties. These entities will act as data processors and generally fall into the following categories:

- Consultants (Organization, Litigation, Law Firms, etc.);
- External structures that work directly with the Company in the technical and information management of the Website and any other external parties to whom it is necessary to communicate the data.

Transfer of data to a third country and/or an international organization

Your personal data will not be transferred to non-European third countries.

Right of access to personal data and other rights

The applicant has the right to access the data concerning him or her at any time and to rectify them if they are incorrect, to delete them or to limit their processing if the conditions are met, or to object to their processing for the legitimate interests pursued by the Company and/or Lu-Ve Group, as well as to obtain the possibility of transferring the data provided by them only if when they are subject to automated processing based on the consent of that person or on the basis of a contract, to the following e-mail address privacy.luve@luvegroup.com . The applicant also has the right to withdraw consent given for the purposes of the processing that require it, without prejudice to the lawfulness of the processing carried out up to the time of its revocation. The Reporting Entity also has the right to lodge a complaint with the competent supervisory authority. The supervisory authority competent for the Data Controller is the President of the Office for Personal Data Protection, 2 Stawki Street, 00-193 Warsaw.