



## Privacy Policy of the Ethical Channel

The personal data that you provide, as the informant, at the time of submitting the communication through as well as those of any employee or collaborator of Suan Farma Holding, S.L. (hereinafter, "**Suanfarma**" or the "**Company**") or of any entities of the Suanfarma Group, and/or third parties or any other personal data that you provide, will be processed in accordance with the provisions of this document.

Submission of the communication is voluntary and can be anonymous.

We ask you to provide only personal data, which is accurate and truthful. The information you provide will be treated as confidential.

**Data Controller.** Suan Farma Holding, S.L. (hereinafter, "**Suanfarma**" or the "**Company**") with NIF B06978845 and address at calle Einstein 8, 28108 Alcobendas, Madrid. You may contact Suanfarma's Data Protection Delegate at the following address: [dpo@suanfarma.com](mailto:dpo@suanfarma.com).

**Categories and types of data.** If a communication is submitted we may obtain the following personal data and information:

- Your name, contact details and your relationship with the Company, if applicable.
- The name of the person and other personal data of the persons, if any, mentioned in your communication (e.g. job description, contact details).
- A description of the event reported, as well as a description of the circumstances in which the incident took place, including the time and place of the incident, and, if applicable, the Group entity/entities affected.
- If the information received contains personal data falling within the special categories of data, they shall be deleted immediately and shall not be recorded and processed, unless the processing of such data is necessary for the management and processing of the communication or for reasons of essential public interest.

**Purpose of processing.** The purposes of data collection are:

- Identify the persons involved, if applicable.
- Manage the internal and/or external communication presented or public disclosure made.
- Process the communication in order to carry out the necessary investigations to find a solution to the issue raised.

**Legitimation.** The legal basis for the processing of personal data in the case of internal and external communications is the fulfilment of the legal obligations incumbent on the Company. In the case of public disclosure, it is understood that the processing is necessary for the fulfilment of a mission carried out in the public interest or in the exercise of public powers vested in the controller .

The processing of special categories of personal data for reasons of essential public interest may be carried out in accordance with Article 9(2)(g) of the European Data Protection Regulation 2016/679.

**Data retention.** The personal data that are the object of processing may be kept only for the time necessary to decide on the appropriateness of initiating an investigation into the facts reported in the communication. In any event, after three (3) months have elapsed from the receipt of the communication without any investigation having been initiated, the data shall be deleted, unless the purpose of the retention is to leave evidence of the operation of the Channel. The maximum period of conservation of the personal data contained in the communication shall be ten (10) years.

Under no circumstances will personal data be processed if they are not necessary for the knowledge and investigation of the actions or omissions to which the communication refers, proceeding, where appropriate, to their immediate deletion.

We also inform you that communications that have not been processed will be deleted or, failing that, may only be recorded in an anonymous form.

If it is accredited that the information provided in the communication or part of it is not truthful, it shall be immediately deleted as soon as this circumstance comes to light, unless this lack of truthfulness may constitute a criminal offence, in which case, the information shall be kept for the necessary time during the legal proceedings.

**Who can access the data?** Access to personal data shall be limited, within the scope of their competences and functions, exclusively to:

- a) The Committee responsible for the Internal Information System and whoever manages it directly.
- b) The head of Human Resources or the duly designated competent body, only when disciplinary measures may be taken against an employee.
- c) The person in charge of the Legal Department, should legal action be taken in relation to the facts described in the communication.
- d) The persons in charge of processing that may be appointed.
- e) The data protection officer.
- f) Likewise, where necessary for the purposes of communication, personal data may be communicated between the Suanfarma Group entities to which the data controller belongs, to the Committee Responsible for the Internal Information System, as well as to the corresponding governing and representative bodies of the Company and of the Group entities involved.

You are informed that your identity will in any case remain confidential and will not be communicated to the persons to whom the facts reported relate or to third parties not identified below. In accordance with the regulations in force, the identity of the informant may only be communicated to the judicial authority, the Public Prosecutor's Office or the competent administrative authority in the context of a criminal, disciplinary or disciplinary investigation.

**International transfers.** Within the framework of the provisions of this Privacy Policy, for the purposes foreseen and in the context of the communications indicated herein, personal data may be transferred to entities of the Group to which the Company belongs, which may be located inside and outside the European Economic Area and have a different level of protection to that of Spain.

In this case, the Company declares that it has taken and will take (if necessary) the necessary legal measures in advance, such as entering into appropriate standard contractual clauses.

**Security measures.** The Company informs you that it has implemented the necessary technical and organisational security measures to guarantee the security and confidentiality of your personal data and prevent its alteration, loss, processing and/or unauthorised access, taking into account the state of technology, the nature of the data stored and the risks to which they are exposed, whether from human action or from the physical or natural environment.

Likewise, the Channel has appropriate technical and organisational measures in place to preserve the identity of the persons concerned and of any third party mentioned in the information provided, especially the identity of the informant in case he/she has or has not identified him/herself.

**Rights.** The informant may, under the terms established in the data protection regulations in force at any given time, exercise the rights of access, rectification, deletion, opposition, the right to request the limitation of the processing of his/her personal data, the right to portability and the right to lodge a complaint with a supervisory authority, the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)). To do so, you may write to [dpo@suanfarma.com](mailto:dpo@suanfarma.com).

In the event that the person to whom the facts related in the communication or to whom the public disclosure refers exercises the right to object, it shall be presumed, in the absence of proof to the contrary, that there are compelling legitimate grounds for the processing of his or her personal data.