

Privacy Policy for the Reporting Channel

Instructions for Use:

This clause will serve as the second informative layer for the processing of personal data related to the whistleblower, the accused/investigated, and witnesses. It must be included on the SISTEMAS INDUSTRIALES NAVALES S.L.U. website, as has been done with the Management Procedure, the channel policy, and the protocol.

Reporting Channel Privacy Policy Text:

SISTEMAS INDUSTRIALES NAVALES S.L.U. makes this communication channel available for reporting potential conduct that may constitute a violation under Law 2/2023, of February 20, regulating the protection of individuals who report regulatory violations and anti-corruption measures. This channel is designed as a transparent and fully confidential means of communication to handle any reports that SISTEMAS INDUSTRIALES NAVALES S.L.U. may receive.

You should only provide information that you believe to be correct, to the best of your knowledge and understanding, and that is relevant for detecting a regulatory violation and/or breach of the SISTEMAS INDUSTRIALES NAVALES S.L.U. Code of Ethics or Conduct. If the communication is manifestly unfounded or if, in the judgment of SISTEMAS INDUSTRIALES NAVALES S.L.U., there are reasonable indications that the information was obtained through the commission of a crime, SISTEMAS INDUSTRIALES NAVALES S.L.U. may initiate whatever disciplinary and/or legal actions it deems appropriate.

In compliance with data protection regulations, the whistleblower, potential witnesses, and the accused are informed of the processing of their personal data as follows:

Informative Clause for the Whistleblower:

The SISTEMAS INDUSTRIALES NAVALES S.L.U. Whistleblowing Channel allows anonymous reporting. However, if the informant or whistleblower wishes to submit the report with identification, SISTEMAS INDUSTRIALES NAVALES S.L.U. may collect, within the communication framework, the following categories of data from the informant and, where applicable, from the individuals involved in the report:

- Identification data
- Contact information
- Professional data

Additionally, SISTEMAS INDUSTRIALES NAVALES S.L.U. may process other types of data based on the facts communicated and any supporting documentation necessary to investigate the report. If the information received contains personal data that falls under special categories of data, it will be immediately deleted, with no record or processing of such data taking place.

No personal data that is not necessary for the investigation of the respective report will be collected. If any irrelevant data is collected, it will be deleted from the Whistleblowing Channel without undue delay. Furthermore, any personal data communicated that relates to conduct not covered by the scope of the Whistleblower Protection Act will be deleted.

In all cases, SISTEMAS INDUSTRIALES NAVALES S.L.U. informs you that personal data will be processed for the following purposes:

- To receive and decide on whether to process the communication received,
- To conduct appropriate investigations into the reported facts and, where necessary, take corrective action,
- To keep the whistleblower or informant informed about the acceptance or rejection of the communication, as well as any progress and outcomes of the investigation process.

The legitimate basis for processing your personal data is compliance with legal obligations arising from the application of Law 2/2023, of February 20, regulating the protection of individuals who report regulatory violations and anti-corruption measures.

Additionally, you are informed that the personal data you provide when submitting the report, as well as any other personal information that may be collected during the investigation process, may be disclosed to:

- Public bodies or institutions, judges, and courts when necessary to take disciplinary measures, process any judicial procedures that may arise, or in cases where legally required,
- The Public Prosecutor's Office, when the procedure falls within its jurisdiction.

The personal data that SISTEMAS INDUSTRIALES NAVALES S.L.U. may have access to as a result of communications received through the Whistleblowing Channel will be processed for the necessary time to determine whether to initiate an investigation into the reported facts and to manage the communication if it is accepted for processing.

Specifically, SISTEMAS INDUSTRIALES NAVALES S.L.U. will process personal data for a maximum of three months from the receipt of the communication or, if no acknowledgment of receipt was sent to the informant, three months from the expiration of the seven calendar days that SISTEMAS INDUSTRIALES NAVALES S.L.U. has to acknowledge receipt of the communication. The aforementioned period may be extended by an additional three months in cases of special complexity.

If the investigation is not initiated within this period, the data will be deleted from the communication system, except for maintaining evidence of the system's operation in an anonymized form.

In the case of communications that are not processed, they will be anonymized, completely deleting personal data.

In any case, you can exercise, where appropriate, your rights of access, objection, rectification, deletion, limitation of processing, portability, and not being subject to automated individual decisions by writing to the email: rgpd@zubicar.es. In any case, you may file a complaint with the Spanish Data Protection Agency.

Informative Clause for the Accused:

You are hereby informed that your data has been provided in the capacity of the investigated/accused party in a report submitted by the whistleblower/informant through the Whistleblowing Channel of SISTEMAS INDUSTRIALES NAVALES S.L.U.

In compliance with current Personal Data Protection regulations, we inform you that the personal data provided by the whistleblower or informant with the report, as well as any other personal information that SISTEMAS INDUSTRIALES NAVALES S.L.U. may collect during the investigation processes, will be processed solely for the purpose of managing the received communication, investigating the reported facts, and, where applicable, taking corrective actions as appropriate.

The legal basis that legitimizes the processing of this data is the fulfillment of legal obligations in accordance with the provisions of Law 2/2023, of February 20, regulating the protection of individuals who report regulatory violations and anti-corruption measures.

All information provided will be processed for the necessary time for its investigation, in accordance with current regulations. Specifically, SISTEMAS INDUSTRIALES NAVALES S.L.U. will process personal data for a maximum period of three months from the receipt of the communication. This period may be extended by an additional three months in cases of special complexity.

If the investigation is not initiated within the said period, the data will be deleted from the communication system, except for maintaining evidence of the system's operation in an anonymized form.

Your personal data will be treated confidentially and will not be disclosed to any third party unless necessary for investigating the reported facts, in which case it may be disclosed to public bodies, judges, and courts, as necessary for processing the corresponding judicial procedures or in cases where legally required, and to the Public Prosecutor's Office, when the procedure falls under its jurisdiction.

Additionally, you are informed that you may exercise your rights of access, rectification, deletion, objection, limitation of processing, and portability by writing to the email: rgpd@zubicar.es. If you believe that your data has been improperly processed, you have the right to file a complaint with the Spanish Data Protection Agency (www.aepd.es).

Informative Clause for the Witness:

You are hereby informed that your data has been provided as a witness in a report submitted by the whistleblower/informant through the Whistleblowing Channel of SISTEMAS INDUSTRIALES NAVALES S.L.U.

In compliance with current Personal Data Protection regulations, we inform you that the personal data about you provided with the report, as well as any other personal information that SISTEMAS INDUSTRIALES NAVALES S.L.U. may collect during the investigation processes, will be processed solely for the purpose of managing the communication, investigating the reported facts, and, where applicable, taking corrective actions as appropriate. The legal basis that legitimizes the processing of this data is the fulfillment of legal obligations in accordance with the provisions of Law 2/2023, of February

20, regulating the protection of individuals who report regulatory violations and anti-corruption measures.

All information provided will be processed for the necessary time for its investigation, in accordance with current regulations. Specifically, SISTEMAS INDUSTRIALES NAVALES S.L.U. will process personal data for a maximum of three months from the receipt of the communication. This period may be extended by an additional three months in cases of special complexity.

If the investigation is not initiated within the said period, the data will be deleted from the communication system, except for maintaining evidence of the system's operation in an anonymized form.

Your personal data will be treated confidentially and will not be disclosed to any third party unless necessary for investigating the reported facts, in which case it may be disclosed to public bodies, judges, and courts, as necessary for processing the corresponding judicial procedures or in cases where legally required, and to the Public Prosecutor's Office, when the procedure falls under its jurisdiction.

Additionally, you are informed that you may exercise your rights of access, objection, rectification, deletion, limitation of processing, portability, and not being subject to automated individual decisions by writing to the email: rgpd@zubicar.es. In any case, you may file a complaint with the Spanish Data Protection Agency.