

## **WHISTLEBLOWER DATA PROTECTION POLICY**

### 1. RESPONSIBLE FOR THE TREATMENT

In accordance with the provisions of the data protection regulations, and specifically in reference to European Regulation EU 2016/679, we inform you that your personal data will be processed in the internal information systems of the Whistleblowing Channel whose responsible is LABORATORIOS CINFA, S.A., company which belongs to CINFA GROUP.

### 2. PERSONAL DATA

The CINFA GROUP Whistleblowing Channel allows the submission of anonymous complaints.

However, if the informant or complainant wishes to present the complaint in a nominative way, LABORATORIOS CINFA, S.A. may collect, within the framework of a communication, the following types of data from the informant and, where appropriate, the people involved in the communication:

- Identification data
- Contact information
- Professional data

Additionally, it may process other types of data based on the facts communicated and the supporting documentation that is appropriate to investigate the complaint.

If the information received contains personal data included within the special categories of data, it will be immediately deleted, without any registration or processing of them, unless they were necessary for the investigation.

In no case will personal data be collected that is not necessary for the investigation of the corresponding complaint and, therefore, in the event that non-relevant data is collected, this data will be removed from the Whistleblowing Channel without undue delay.

### 3. PURPOSES

LABORATORIOS CINFA, S.A. will process personal data for the following purposes:

- Receive and decide on the admission for processing of the communication received.
- Carry out the appropriate investigations of the reported events and, where appropriate, adopt the corresponding corrective measures.
- Keep the complainant or informant informed about the admission or not of the communication, as well as the progress and results of the research process.

#### 4. LEGITIMATION FOR TREATMENT

The legitimate basis for the processing of your personal data is the fulfilment of the obligations legal provisions

#### 5. RECIPIENTS OF THE INFORMATION

The personal data that you may provide when filing the complaint, as well as any other information of a personal nature that may be collected, where appropriate, during the investigation process, will be communicated exclusively to people who must know the information for their investigation and resolution.

However, the data that LABORATORIOS CINFA, S.A. may access due to the communications received through the Whistleblowing Channel be communicated to:

- Public organizations or institutions, judges and courts when necessary for the adoption of disciplinary measures, for the processing of judicial procedures that, where applicable, are appropriate or in those cases in which it is legally required.
- To the Public Prosecutor's Office, when the procedure falls within its jurisdiction.

#### 6. CONSERVATION PERIOD

All information provided will be retained for the period necessary for investigation and subsequently for the period of time necessary to address potential legal liabilities or in order to prove the functioning of the system in accordance with current regulations.

#### 7. RIGHTS

You can exercise, when appropriate, your rights of access, opposition, rectification, deletion, limitation of the treatment, portability and not to be subject to automated individual decisions by contacting the Data Protection Officer to [lopd@cinfa.com](mailto:lopd@cinfa.com) proving your identity and specifying your request. In any case, you can file a claim with the Spanish Data Protection Agency.