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PRIVACY POLICY ON WHISTLEBLOWING

(in accordance with the GDPR n. 679/2016)

Fiber Group Sh.p.k. intends to inform data subjects about the processing of the collected data and about the rights that are recognized to them under EU Regulation 679/2016.

The *Fiber Group Sh.p.k.* in relation to the data processed for the purpose of receiving, analysing, investigating and managing alerts, please read carefully the Privacy Policy.

1. Data controller

The data controller is *Fiber Group Sh.p.k.*, represented by the Legal Representative pro tempore, contactable at the email address info@wearefiber.com with registered office in Laja Apollonia, Via Don Bosco, complex Vizion Plus P.zzo 43/2 (7/2) Albania.

2. Data Protection Officer

The Data Protection Officer can be contacted at dpo@wearefiber.com.

3. Purpose of processing

The data you provide to report alleged unlawful conduct that you have become aware of due to your employment, service or supply relationship with *Fiber Group Sh.p.k.* will be treated by the Company itself to manage such situations in order to take any measures. Pursuant to art. 6, paragraph 1 letter f) of the European Regulation n.679/2016 (hereinafter also the "Regulation"), all personal data collected within the processing crib are strictly functional and necessary for the pursuit of the provisions of L.60/2016, as well as any need for internal control, monitoring of business risks, defending a right in court or for other legitimate interests of the Data Controller. Personal data are therefore acquired because they are contained in the report and/or in documents and documents attached to it, they refer to the reporting subject and may also refer to persons indicated as possible responsible for illegal conduct, as well as those in various ways involved in the events reported. In particular, to carry out the necessary investigative activities aimed at verifying the validity of the information reported, and, where appropriate, take appropriate corrective measures and take appropriate disciplinary and/or judicial action against those responsible for the unlawful conduct.

4. Type of data processed

The reception and management of reports may give rise to processing of personal data c.d. "common" (name, surname, work role, etc.), processing of personal data c.d. "particular" (data relating to health conditions, sexual orientation or union membership, pursuant to art. 9 GDPR) and personal data relating to criminal convictions and offences (pursuant to art. 10 GDPR).

Personal data subject to processing falls into the following categories:

- **Personal data of the reporting person in the case of reports made in a non-anonymous form through the dedicated platform:**
 - o Common:
 - Compulsory: name, surname;
 - Optional: qualification, contribution role, telephone contact, e-mail address.
- **Personal data of the reporting person in the case of non-anonymous reporting by other means:**
 - o Reports may also be sent through alternative channels, such as postal and electronic mail. In this case, the personal data processed are those voluntarily communicated by the reporting person.
- **Personal data relating to person(s) involved in the alert:**
 - o The Data that the reporting person intends to provide to represent the facts described in the alert. The aforementioned data will be processed with computer and paper media that guarantee the security and confidentiality.



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5. Legal bases for processing

In the light of the relevant legislation, it is specified that:

- The processing of "common" data is based on the legal obligation to which the Data Controller is subject (art. 6, par. 1, lett. c) of the GDPR);
- The processing of data relating to criminal convictions and offences, taking into account the provisions of art. 10 GDPR, is based on the legal obligations to which the Data Controller is subject (art. 6, pr 1, lett. c) GDPR) and on the performance of tasks of public interest assigned by law to *Fiber Group Sh.p.k.*

6. Authorised data processors

For the pursuit of the aforementioned purposes, the personal data provided are made accessible only to those who, within the Company and with permission, are competent to receive or follow up the analysis activities, investigation and management of alerts and any subsequent actions. Such persons shall be properly instructed in order to avoid loss, access to data by unauthorised persons or unauthorised processing of data and, more generally, in relation to obligations regarding the protection of personal data.

The identity of the reporting person and any other information from which he or she may derive, directly or indirectly, such identity may be disclosed to persons other than those competent to receive or respond to alerts only with the person's express consent.

7. Categories of recipients of personal data

Your personal data and those of the persons indicated as possible responsible for the unlawful conduct, as well as of the persons in various ways involved in the reported events, will not be disseminated, however, if necessary, upon their request, may be transmitted to the Judicial Authority. These subjects are, all, independent data controllers.

8. Methods of processing

Personal data will also be processed with automated tools for the time strictly necessary to achieve the purposes for which they were collected. The *Fiber Group Sh.p.k.* implement appropriate measures to ensure that the data provided are processed in an appropriate manner and in accordance with the purposes for which they are managed; *Fiber Group Sh.p.k.* use appropriate security, organisational, technical and physical measures to protect the information against alteration, destruction, loss, theft or misuse or unlawful use.

9. Data retention period

The data collected as a result of the reports are kept for the time necessary to achieve the purposes for which they are processed (principle of limitation of storage, art. 5 GDPR) or according to the deadlines provided by law. The Data Controller will then process personal data for the time necessary to fulfil the above purposes and in any case for no more than 5 years from the date of communication of the final outcome of the reporting procedure, in compliance with confidentiality obligations. In case of out-of-scope reports/complaints (for example, disputes, claims or requests related to a personal interest of the reporting person, communications or complaints relating to commercial activities or services to the public), they shall be retained for a period not exceeding 12 months from its storage.

10. Rights of Data Subjects

The EU Regulation 2016/679 (art. 15 to 22) confers on the data subjects the exercise of specific rights. In particular, in relation to the processing of your personal data subject to this policy, the data subject has the right to ask *Fiber Group Sh.p.k.*:

- **access:** the data subject may request confirmation that a processing of data concerning him or her is in place, in addition to further clarifications on the information referred to in this statement;
- **Rectification:** the data subject may ask to rectify or supplement the data he has provided, if incorrect or incomplete;
- **deletion:** the data subject may request that his or her data be deleted, if they are no longer necessary for the aforementioned purposes, in case of withdrawal of consent or his or her opposition to processing, in case of unlawful processing, or there is a legal obligation to cancel;
- **limitation:** the data subject may request that his or her data be processed only for the purpose of storage, excluding other processing, for the period necessary for the rectification of his or her data, in the event of



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unlawful processing for which he or she opposes deletion, where it has to exercise its rights in court and the data stored can be used and, finally, in the event of opposition to the processing and a check is ongoing on the prevalence of the legitimate reasons of *Fiber Group Sh.p.k.* with respect to its own;

- **opposition:** the data subject can object at any time to the processing of his data, unless there are legitimate reasons to proceed with the processing that prevail over yours, for example for the exercise or defense in court;
- **portability:** the data subject may request to receive his data, or to have them transmitted to another holder by the same indicated, in a structured, commonly used and machine-readable format.

You have the right, at any time, to obtain confirmation of the existence or otherwise of the data provided. You also have the right to request, in the forms provided for by law, the rectification of inaccurate personal data and the integration of incomplete personal data and to exercise any other right pursuant to Articles 18 to 22 of the Regulation where applicable. If you have given your consent to the disclosure of your identity in the context of disciplinary proceedings, you have the right to revoke such consent at any time, without prejudice to the lawfulness of the processing, based on consent, carried out before the withdrawal. These rights can be exercised by contacting the Data Protection Officer at dpo@wearefiber.com or in writing at *Fiber Group Sh.p.k.*, Lagja Apollonia, Via Don Bosco, complex Vizion Plus P.zzo 43/2 (7/2), Albania.