

WHISTLEBLOWER CHANNEL PRIVACY POLICY

The purpose of this Privacy Policy of the Whistleblower Channel of KEREIS CORREDURÍA DE SEGUROS S.L. and KEREIS SOLUTIONS IBERIA S.L. (hereinafter "KEREIS IBERIA"), is to provide all the relevant information regarding the processing of personal data that, where appropriate, will be carried out handling and managing reports submitted through this channel.

For its setup, design, and management, Kereis Iberia fully complies with applicable data protection regulations: Regulation (EU) 2016/679 of the European Parliament and the Council, of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and the free movement of such data, and particularly in relation to whistleblower protection under Directive (EU) 2019/1937 of October 23, 2019, concerning the protection of persons reporting breaches of Union law. This Directive ensures that whistleblowers can report, internally and to authorities, any breaches of European regulations within an organization through channels that guarantee their security, without fear of retaliation.

This privacy policy also reflects the Law 2/2023, of February 20, regulating the protection of persons who report regulatory infringements and the fight against corruption "Whistleblower Law", transposition of the Directive, in order to protect whistleblowers, and to establish the rules of internal reporting channels.

Additionally, it complies with the requirements set by Organic Law 3/2018, of December 5, on the Protection of Personal Data and the guarantee of digital rights, particularly regarding internal whistleblowing information systems.

In accordance with the above, we inform you of the following:

1. Data Controller

- **Identity:** KEREIS CORREDURÍA DE SEGUROS S.L. and KEREIS SOLUTIONS IBERIA.S.L. (hereinafter "KEREIS IBERIA").
- **Tax ID:** B-08859282 (Brokerage) and B-64946197 (Solutions).
- **Address:** Avenida Diagonal 622, 5th floor. 08021 Barcelona.
- **Email:** CEC@kereisiberia.com.

2. Data Processing

PERSONAL DATA Collected	PURPOSE (Use of Data)	Legal Basis for Processing Personal Data	Retention Period
Name and surname (if provided)	Managing the notification, investigating the reported facts, and informing about the outcome of the process.	Legitimate interest of the company in investigating potential irregular conduct. Art. 6.1(c) GDPR.	Only as long as necessary to decide whether an investigation is warranted.
Email address	Contacting the whistleblower for case follow-up.	Legitimate interest of the company.	Only as long as necessary for case follow-up

Phone number (if provided)	Contacting the whistleblower if necessary.	Legitimate interest of the company.	Only as long as necessary for investigation.
Content of the complaint	Evaluating and investigating the reported facts.	Legitimate interest of the company.	Indefinitely for audit and compliance purposes.

In any case, data will be kept in the system for three months from the date of entry unless investigative actions have commenced.

However, they may be retained to provide evidence of the system's operation. Communications that are not processed will be kept only in an anonymized manner, without the application of the blocking obligation under Article 32 of the LOPDGDD.

3. Obligation to Provide Data

If the whistleblower refuses to provide their data, KEREIS IBERIA may refuse to process the complaint. Mandatory fields must be completed for the complaint to be properly managed.

4. International Data Transfers

In general, the data provided through the Whistleblowing Channel will not be subject to International Data Transfers. In the event of such a transfer, the interested parties will be notified.

5. Data Recipients

Access to the data is strictly limited to those performing internal control and compliance functions.

However, it may be lawful for other individuals, including third parties, to access the data when necessary for disciplinary measures or legal proceedings:

- Data may be shared with Public Authorities, Law Enforcement Agencies, Judges, and Courts when necessary.
- Data may also be shared with professional service providers essential for resolving the complaint, under a data processing agreement in accordance with the GDPR and Organic Law 3/2018.

6. User Rights

You have the right to:

- **Access:** Request access to their personal data.
- **Rectification:** Request the modification of inaccurate or incomplete data.
- **Erasure:** Request the deletion of their data when it is no longer needed.
- **Restriction:** Restrict the use of their data in certain cases.
- **Objection:** Request that their data not be processed; Kereis Iberia will cease processing their data unless there are legitimate reasons, such as the exercise or defense of potential claims.
- **Portability:** Request the transfer of their data.

7. Exercising Your Rights

You can exercise your rights via:

- **Mail:** Written communication to KEREIS CORREDURÍA DE SEGUROS S.L. & KEREIS SOLUTIONS IBERIA S.L., - Att. Delegada de Protección de Datos. Avenida Diagonal 622, 5th floor. 08021 Barcelona.
- **E-mail:** dataprotectionoffice@kereisiberia.com.

In both cases, a copy of the ID card or other identity document must be included.

You may also file a complaint with a competent data protection authority regarding the processing of your personal data. ([AEPD](#))

8. Data Security

KEREIS IBERIA is committed to protecting and securing personal data, implementing technical and organizational measures to prevent alterations, losses or unauthorized access, in accordance with the RGPD and Organic Law 3/2018.

9. Modifications to the Privacy Policy

The Company reserves the right to modify this policy to adapt it to new regulations or improvements in the management of the Whistleblowing Channel. Any changes will be published on our website.