

## Information on the processing of personal data of the Whistleblowing channel

In accordance with article 5 of Law 2/2023 of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption, Regulation (EU) 2016/679 (hereinafter the 'RGPD'), Organic Law 3/2018 of 5 December, on the Protection of Personal Data and the guarantee of digital rights (hereinafter the 'LOPD-GDD') and Organic Law 7/2021. The data controller will be Redwood Holding Iberia, S.L ('Redwood') with Tax Identification Code B88054036 and registered office at C/Cronos 63, 4th floor, door 2 (28037) Madrid.

Redwood will process personal data solely for the purpose of processing communications and/or complaints under article 24 LOPD-GDD, for the purposes of managing and, where appropriate, investigating the reality of the facts that are the subject of the communication and/or complaint, as well as to be able to request, where appropriate, additional information in this regard.

The legitimate basis for the processing of the personal data provided by the informant when making the report or complaint or subsequently processed as a result of the investigation of the reported facts is the fulfilment of a legal obligation applicable to Redwood. In addition, the processing of special categories of data that may occur within the framework of the reporting channel is covered by the exception in Article 9.2. g) GDPR (reasons of essential public interest).

The regulations applicable in Spain establish the obligation to establish communication channels and recognise these as an excellent tool for effective crime prevention, including all the company's stakeholders (employees, managers, etc.) as part of the company's internal risk management control. In particular:

- Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption.
- Article 31 bis 2. 4º of the Criminal Code establishes the 'obligation to report possible risks and breaches to the body responsible for overseeing the operation and compliance with the prevention model'. Implicitly, companies must provide a channel through which information can be sent.
- Article 26.bis of Law 10/2010 of 28 April on the prevention of money laundering and terrorist financing establishes the obligation for obliged entities to establish procedures so that their employees, managers or agents can communicate, even anonymously, relevant information on possible breaches of this law, its implementing regulations or the policies and procedures in place.

The personal data to be processed by Redwood within the framework of the reporting channel are as follows:

- a) Name and contact details of the informant, in the case of a non-anonymous report. The informant may also voluntarily identify him/herself at a later point in the reporting process or provide additional documentation or information at a later point in the process.
- b) Information provided both at the time of the complaint and throughout the processing of the case.
- c) Name and other personal details of the persons mentioned in the complaint (alleged offender, possible witnesses and others), if such information is provided.



Redwood may obtain data both directly from the informant and from third parties (e.g. witnesses, investigated, law enforcement agencies, etc.), as well as through documents provided or related to the reported event and information technology resources assigned to the informant and reported, including, but not limited to, their corporate email, as well as any other information technology resources provided by Redwood.

Redwood will not communicate the data collected to third parties, except to the competent judicial and public authorities, when this is strictly due to a legal obligation, in the context of investigations.

Furthermore, 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.

Personal data that are not necessary for the purpose of knowledge and investigation of the reported or reported actions or omissions will not be processed and will be deleted immediately.

The data processed shall be kept only for the time necessary to decide whether to initiate an investigation into the facts reported. In any case, after three 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 storage is to leave evidence of the operation of the system. Communications that have not been followed up may only be recorded in anonymised form, without the obligation to block provided for in article 32 of Organic Law 3/2018, of 5 December, being applicable.

Once the investigation has been initiated and in the event that the facts have been proven, the period of conservation of the personal data relating to the information received and the internal investigations shall be that of the period of limitation of legal actions and, in the case of the processing of the legal proceedings arising from the investigation carried out, when such proceedings have been firmly concluded, and in no case may the data be conserved for more than 10 years. After these periods, the data shall only be kept in an anonymised form for reporting or statistical purposes, in order to prevent the maintenance of the data for a longer period of time from prejudicing the rights of the data subject and the complainant, whose confidentiality must be guaranteed.

Cuando la comunicación se realice de forma verbal, esta será grabada con la misma finalidad, previo consentimiento del informante. Dicha grabación podrá ser objeto de distorsión de la voz a la elección del informante.

You may contact our Data Protection Delegate by post to the address indicated previously in this document, or by sending an e-mail to the following e-mail address: [dpo@redwoodcorp.com](mailto:dpo@redwoodcorp.com).

You may exercise your rights of access, rectification, suppression, opposition, limitation and portability by sending an e-mail to [dpo@redwoodcorp.com](mailto:dpo@redwoodcorp.com), providing proof of your identity. If the data subject exercises his/her right to object to the processing of his/her personal data, it shall be presumed that, unless there is proof to the contrary, there are compelling legitimate grounds for the processing of his/her personal data. Moreover, the exercise of the right of access by the data subject does not, under any circumstances, imply access to data relating to the identity of the informant.

If you consider that your right to data protection has been infringed, you may lodge a complaint with the Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)).





You may also report to the Independent Authority for the Protection of the Informant, A.A.I., or to the corresponding regional authorities or bodies, the commission of any actions or omissions included in the scope of Law 2/2023 of 20 February, either directly or following communication through the corresponding internal channel.

