

**PRIVACY POLICY FOR INTERNAL INFORMATION SYSTEM ARTS.
13 and 14 OF REGULATION (EU) 2016/679 ("GDPR")**

1. CONTACT DETAILS OF THE DATA CONTROLLER AND DATA PROTECTION OFFICER

DATA CONTROLLER	W Executive España S.L. Registered office: Paseo de la Castellana, 85, 28046, Madrid. Tax Code (CIF): B72971385 E-mail: info@wexecutive.es (Hereinafter referred to as " W Executive " or the " Controller ")
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2. PURPOSE AND LEGAL BASIS FOR PROCESSING

W Executive will process the personal data collected through the **Internal Information System** for the sole purpose of processing the communications received in accordance with the provisions of the Policy and the Procedure for the Management of the Internal Information System and with the guarantees established in Law 2/2023 regulating the protection of persons who report regulatory infringements and the fight against corruption (LPI - Intellectual Property Law) (hereinafter referred to as the "**Personal Data**").

W Executive guarantees that the identity of the informant shall in all cases be kept confidential and shall in no case be communicated to the person reported or to unauthorised third parties. To this end, **W Executive** will adopt the necessary technical and organisational measures to ensure the confidentiality and anonymity of the informant where applicable, and security of the data managed through the Channel, preventing its alteration, loss, processing, or unauthorised access, all in compliance with the current regulations on personal data protection and the LPI.

The legal basis for processing will be the fulfilment of a legal obligation [Art. 6.1(c) of the GDPR] pursuant to the provisions of article 30.2 paragraph 2 of the LPI.

3. RETENTION

Personal Data will be retained only for the time necessary to decide whether to initiate an investigation into the reported facts. In any case, after three months from the receipt of the data, it will be deleted from the complaints system. If retention is necessary to continue the investigation, the data may continue to be processed in a different environment by the Investigating Body or the System Controller, provided that the processing is necessary for the exercise of the functions entrusted to them for the fulfilment of the provisions of the Procedure for the Management of the Internal Information System.

4. RECIPIENTS

Personal Data may be disclosed only to:

- a) The System Controller, Compliance Officer, Investigating Body, and/or the body tasked with taking appropriate measures in case of non-compliance pursuant to the provisions of the Procedure for the Management of the Internal Information System.
- b) Administrative or judicial authorities, to the extent that the data are required by them as a result of any judicial or administrative procedure related to the subject of the communication, as well as to persons strictly necessary for any

action essential to the resolution of the investigation, in accordance with the provisions of this policy.

5. RIGHTS OF THE DATA SUBJECT

You have the right to access your personal data, as well as to request the rectification of inaccurate data or, where appropriate, to request its deletion when, among other reasons, the data are no longer necessary for the purposes for which they were collected or you withdraw your consent to the processing, when the data were necessary for these purposes.

In certain circumstances, you may also request the limitation of the processing of your data, in which case they will only be retained for the exercise or defence of claims.

Furthermore, when the processing is based on the fulfilment of a task carried out in the public interest or to satisfy the legitimate interests of the Company, and for reasons related to your particular situation, you may object to the processing of your data. The Company will stop processing the data, except in those cases in which it is necessary to continue with the processing for legitimate reasons, or for the exercise or defence of possible claims.

You may exercise these rights by sending a written request to W Executive at the postal address indicated above, or to the e-mail address privacy@wexecutive.es.

You also have the right to lodge a complaint with the Spanish Data Protection Agency via its website www.aepd.es.