

Whistleblower Channel Privacy Policy

1. Purpose and scope

This Privacy Policy explains how **Bloq.it** processes personal data in connection with its Whistleblower channel.

The Whistleblower channel is the confidential reporting mechanism made available by **Bloq.it** from time to time, through the reporting means available at any given time, for concerns raised in good faith, including reports of past, current, or suspected breaches of law, the Code of Conduct, internal policies, or other misconduct.

This Privacy Policy applies to personal data processed when a Report is submitted, assessed, investigated, followed up, documented, or retained.

It forms an integral part of the Regulation of the Ethics Committee and is approved together with it.

2. Definitions

- **Bloq.it** means the controller, as identified in section 3 of this Policy\.
- **Whistleblower channel** means the confidential reporting mechanism made available by **Bloq.it** from time to time, through the reporting means available at any given time, for concerns raised in good faith, including reports of past, current, or suspected breaches of law, the Code of Conduct, internal policies, or other misconduct.
- **Report** means any communication submitted through the Whistleblower channel or otherwise referred to the Ethics Committee for assessment.
- **Reporter** means the person submitting a Report.
- **Concerned Person** means any person identified in a Report as allegedly responsible for, involved in, or connected with the reported facts.
- **Ethics Committee** means **Bloq.it's** internal committee responsible for receiving, assessing, and coordinating the handling of Reports submitted through the Whistleblower channel.
- **Personal data** means any information relating to an identified or identifiable natural person.
- **Processing** means any operation carried out on personal data, including collection, recording, storage, consultation, use, disclosure, restriction, deletion, or destruction.
- **Sensitive personal data** means personal data that requires special protection under applicable data protection law, including data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health data, or data concerning sex life or sexual orientation.

3. Who is responsible for your personal data?

The controller of personal data processed in connection with the Whistleblower channel is:

BLOQSTRX, S.A.

Av. Dom João II 13, 7 andar, 1990-077 Lisboa, Portugal

Company Registration no.: 515178683

Email: whistleblowing@bloq.it

Where a Report concerns another Bloq.it group company, that company may also process personal data as controller to the extent necessary to assess, investigate, or follow up on the Report.

For questions about this Privacy Policy or the Processing of personal data through the Whistleblower channel, you may contact **Bloq.it** at whistleblowing@bloq.it.

4. Whose personal data may be processed?

Depending on the content of the Report and the follow-up required, Bloq.it may process personal data relating to:

- o the Reporter;
- o the Concerned Person;
- o witnesses or other persons mentioned in the Report;
- o persons assisting the Reporter;
- o employees, former employees, candidates, contractors, suppliers, shareholders, business partners, or other third parties with a direct or indirect relationship with **Bloq.it**; and
- o persons involved in assessing, investigating, deciding on, or following up on the Report.

5. What personal data may be processed?

Bloq.it may process the personal data necessary to handle a Report, including:

- o identification and contact details of the Reporter, the Concerned Person, witnesses, or other persons mentioned in the Report, such as name, role, company, email address, telephone number, or relationship with **Bloq.it**;
- o personal data included in the Report, supporting documents, evidence, messages, or follow-up communications;
- o personal data obtained during the assessment, investigation, follow-up, outcome, and documentation of the Report.

Reporters should avoid including personal data that is not relevant to the Report. Sensitive personal data should only be included where necessary to explain the concern.

Sensitive personal data may include, for example, information about health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life, or sexual

orientation. Reports may also include information relating to alleged criminal offences or misconduct. **Bloq.it** will process such information only where necessary and permitted by applicable law.

Where a Report is submitted anonymously, **Bloq.it** will not seek to identify the Reporter unless this is required by law or strictly necessary and proportionate to investigate misuse of the Whistleblower channel, including deliberately false or malicious reporting.

6. Why does Bloq.it process personal data?

Bloq.it processes personal data through the Whistleblower channel to:

- o receive, acknowledge, assess, investigate, and follow up on Reports;
- o communicate with the Reporter, where possible and appropriate;
- o verify facts and assess whether misconduct, breach of policy, or breach of law may have occurred;
- o take or recommend corrective, preventive, disciplinary, contractual, legal, governance, or control measures, where appropriate;
- o comply with legal obligations;
- o cooperate with competent authorities, where required or appropriate;
- o establish, exercise, or defend legal claims;
- o keep records of Reports and follow-up actions; and
- o monitor and improve the effectiveness, integrity, and security of the Whistleblower channel and related procedures.

Bloq.it may also use anonymised or aggregated information for internal reporting, compliance monitoring, training, and improvement of policies, controls, and procedures.

7. Legal basis for Processing

Bloq.it processes personal data where it has a lawful basis to do so, including where the Reporter has given explicit consent to the Processing of his or her personal data for one or more specific purposes, or where the Processing is necessary for:

- o protecting the vital interests of the Reporter or of another natural person;
- o compliance with legal obligations applicable to **Bloq.it**;
- o **Bloq.it**'s legitimate interests in preventing, detecting, investigating, and addressing misconduct, protecting people, protecting the business, and safeguarding **Bloq.it**'s integrity and reputation;

Where special categories of personal data, or data relating to criminal offences or alleged offences, are processed, **Bloq.it** will rely on the applicable legal grounds and safeguards under data protection law.

8. Who can access personal data?

Access to personal data is limited to persons who have a legitimate need to know for the purpose of assessing, investigating, following up on, documenting, or retaining the Report.

Depending on the case, personal data may be accessed by:

- members of the Ethics Committee;
- the CEO, the Board of Directors, or a non-conflicted Board member or body, where escalation is required under the Regulation of the Ethics Committee;
- selected internal teams, such as People, Finance, Operations, or other relevant functions, where their support is necessary;
- external advisors, such as legal counsel, auditors, forensic experts, or other specialists; and
- competent authorities, courts, regulators, or law enforcement bodies, where required or appropriate.

All access will be limited to what is necessary and subject to confidentiality, need-to-know, data protection, information security, and conflict-of-interest safeguards.

9. Sharing with service providers and third parties

Bloq.it may use service providers to operate or support the Whistleblower channel, case management, IT systems, information security, legal advice, or investigation support.

Where service providers process personal data on behalf of **Bloq.it**, they must process it only under **Bloq.it's** instructions and subject to appropriate confidentiality, security, and data protection obligations.

Bloq.it may also disclose personal data to third parties where necessary to comply with legal obligations, protect rights and safety, cooperate with competent authorities, or establish, exercise, or defend legal claims.

10. International transfers

Bloq.it aims to process personal data within the European Economic Area whenever possible.

Where personal data needs to be transferred outside the European Economic Area, **Bloq.it** will ensure that the transfer is made in accordance with applicable data protection law and subject to appropriate safeguards, such as an adequacy decision, standard contractual clauses, or another lawful transfer mechanism.

11. Security and confidentiality

Bloq.it applies appropriate technical and organisational measures to protect personal data and case information against unauthorised access, loss, misuse, alteration, disclosure, or destruction.

These measures may include need-to-know access, secure storage, confidentiality obligations, access controls, approved tools and systems, and restrictions on copying, exporting, downloading, or sharing case information outside approved channels unless authorised and necessary.

Any person involved in the handling of a Report must comply with confidentiality obligations and protect the identity of the Reporter, the Concerned Person, witnesses, and any third parties mentioned in the Report, to the extent possible and in accordance with applicable law.

12. Retention

Reports and follow-up records are retained for at least 5 years. They may be retained for longer where judicial, administrative, disciplinary, regulatory, or other proceedings relating to the Report are pending, or where longer retention is necessary to comply with legal obligations, protect rights, or establish, exercise, or defend legal claims.

Nevertheless, the period of time during which personal data is stored and retained varies according to the purpose for which the information is used. Therefore, and whenever there is no specific legal requirement, the data will only be stored and kept for the minimum period necessary for the purposes for which it was collected or further processed, after which it will be deleted.

13. Data subject rights

Under applicable data protection law, data subjects may have the right to:

- o access their personal data;
- o request correction of inaccurate or incomplete personal data;
- o request deletion of personal data, in certain cases;
- o request restriction of Processing;
- o object to certain Processing activities;
- o request portability of personal data, where applicable; and
- o lodge a complaint with a supervisory authority.

These rights may be limited where necessary to protect confidentiality, anonymity, the integrity of the assessment or investigation, legal privilege, evidence, the rights and freedoms of others, **Bloq.it's** legal position, or compliance with legal obligations.

To exercise your rights or ask questions about privacy, contact privacy@bloq.it.

14. Changes to this Privacy Policy

Bloq.it may update this Privacy Policy from time to time, including to reflect changes in law, the Whistleblower channel, the Regulation of the Ethics Committee, internal processes, or the way personal data is handled.