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[SB-06]

Whistleblower Mechanism User Guide

Table of Contents

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Glossary

Alert

Any report deemed admissible under this procedure.

Good Faith

To act in good faith, the whistleblower must have reasonable grounds to believe, considering the circumstances and information available at the time of the reporting, that the facts they report are truthful, even if these facts are later shown to be inaccurate.

Whistleblower

A whistleblower is an individual who reports or discloses, in good faith and without direct financial compensation, information about alleged serious violations of human rights and fundamental freedoms resulting from inappropriate and/or improper use of Datafusion Systems' products.

The whistleblower must have obtained this information:

1. In the course of their professional activities, or
2. Through personal knowledge of the matter.

Retaliation

Any direct or indirect act or omission occurring in a professional context because of an internal or external report, or following a public disclosure, which causes or could cause unjustified harm to the whistleblower.

Report

Any information disclosed by the whistleblower regarding alleged serious violations of human rights and fundamental freedoms resulting from inappropriate and/or improper use of Datafusion Systems' products.

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Introduction

Datafusion Systems has implemented a whistleblower mechanism for collecting and managing alerts in compliance with applicable laws, in cases of serious violations of human rights and fundamental freedoms resulting from the inappropriate and/or improper use of Datafusion Systems' products.

Datafusion Systems upholds the fundamental principle of freedom of expression applicable to whistleblowers, regardless of their location or place of residence. The company encourages whistleblowers to speak out without fear or threat of retaliation.

What is the objective of this mechanism?

The implementation of mechanisms designed to receive, manage, and address alerts aims to allow whistleblowers and/or civil society actors to report abuses, violations, or other concerns related to the use of Datafusion Systems' products.

Who can make a report?

The whistleblower – whether a direct victim, a witness, or someone with personal knowledge of the reported facts – must fall in the following categories of individuals:

- Be an internal, external, or collaborator of Datafusion Systems or sub-contractors;
- Be a third-party individual (such as an employee of a client or a supplier of Datafusion Systems);
- Be a a representative of an NGO, media, or any civil society organization.

How to report

The whistleblower may, in the language of their choice, use one of the following channels:

1. Oral communication:
   - Telephone;
   - Voicemail system.

2. Written communication:
   - A confidential and secure platform as the preferred private communication channel between Datafusion Systems and the whistleblower;
   - The whistleblower must be an individual
   - A dedicated email address;
   - Other written channels such as WhatsApp or Signal.

The report must include the following information:

- Subject
- Period/dates (particularly the date of the first occurrence of the facts)
- Location
- Description
- Other witnesses
- Attachments (files)

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What should the report cover?

The report concerns any information disclosed by the whistleblower related to alleged serious violations of human rights and fundamental freedoms resulting from inappropriate and/or improper use of Datafusion Systems' products.

What is the procedure for handling the report?

The admissibility criteria are as follows:

- The report concerns the use of Datafusion Systems' products.
- The report involves a serious violation of human rights and fundamental freedoms.
- The reported facts are based on serious and tangible evidence, possibly supported by documentation (photos, documents, videos, etc.).
- The whistleblower must be an individual
- The report is made in good faith.
- The report is made without direct financial compensation.

The admissibility of the report submitted through the Alert Platform will be reviewed within a maximum of 30 calendar days from reception, barring requests for additional information. The Whistleblower will be informed within the same timeframe whether their report is deemed admissible or not.

Can the report be anonymous?

Reports may be submitted anonymously.

Is the confidentiality of the report preserved?

The mechanism is designed to ensure the integrity and confidentiality of the information collected in a report and throughout the entire alert handling process, including the identity of the whistleblower, the individuals involved, and any third parties mentioned.
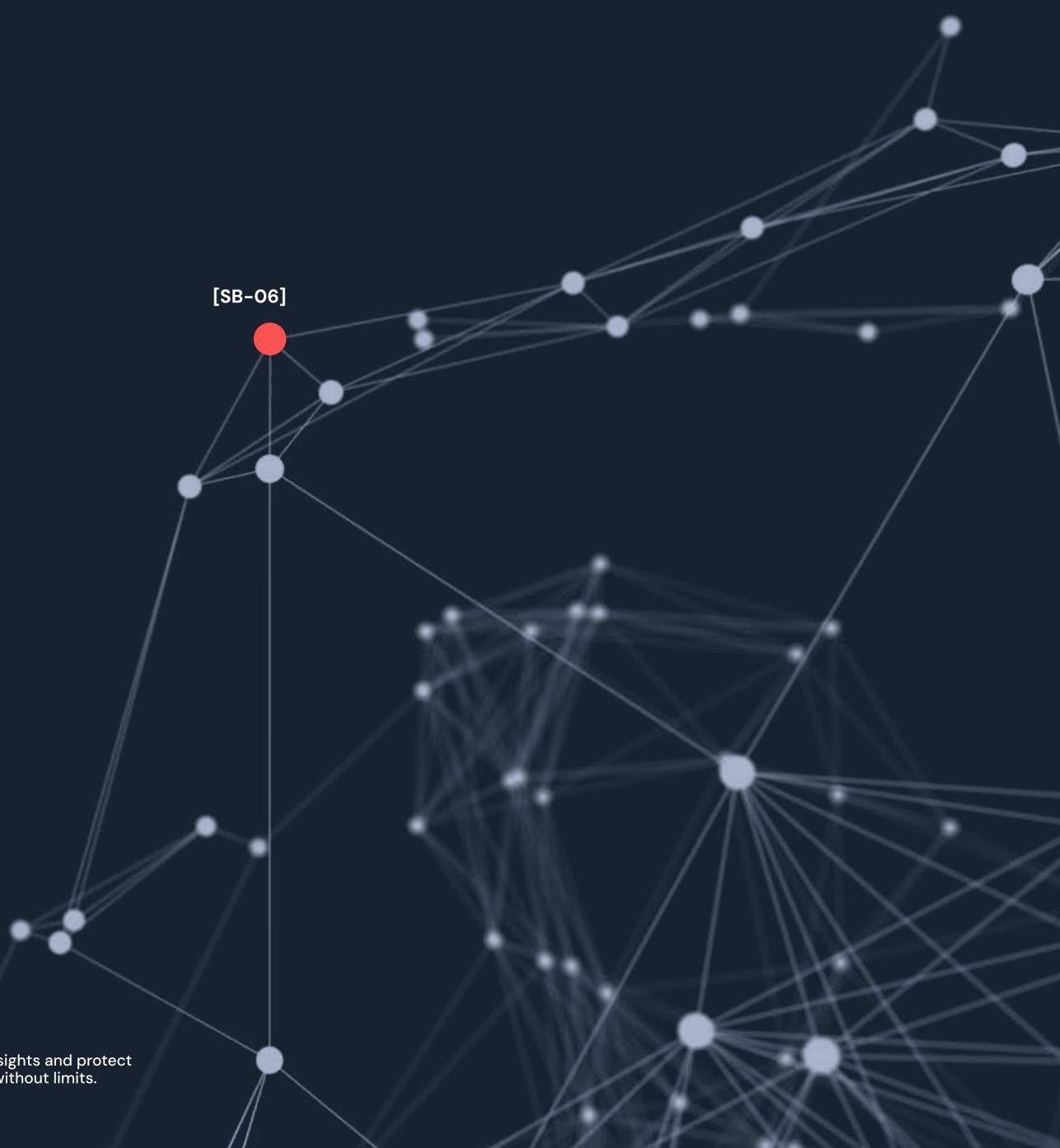
The whistleblower has the right to access, rectify, and delete their data, as well as to object to its processing and request its limitation. When submitting a report, the whistleblower is informed with a detailed notice regarding the use of their personal data.

What protection is provided to the whistleblower?

No retaliatory actions, threats, or attempts at such measures, nor any sanctions (including disciplinary ones), shall be taken against a whistleblower who has reported in good faith and without direct financial compensation. Misuse or use in bad faith of the alert system, however, exposes the author to disciplinary action and possible legal proceedings.

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