



ALUDEC GROUP WHISTLEBLOWING CHANNEL PRIVACY POLICY

1. DATA CONTROLLER. WHO WILL PROCESS YOUR DATA?

ALUDEC, S.A., as the Group's parent company, along with the relevant company belonging to the Group in the event that the whistleblower has an employment, commercial or professional relationship with that company (Aludec Galvanic S.A., Aludec Stamping S.A., Aludec Inyección S.A. or Aludec Componentes S.L.).

All companies belonging to the Aludec Group have agreed that the system, the exercise of data protection rights and the making available of information will be the responsibility of Aludec S.A.

Contact details:

- Dirección de contacto para denuncias:
canaldenuncias@aludec.com
- Contact address for non-report-related data protection matters:
protecciondatos@aludec.com

2. PERSONAL DATA PROCESSED AND ORIGIN

Identification and contact details (whistleblower's name and surname -if the report is not made anonymously- and those of the individual subject to the report, and the whistleblower's professional contact details -if the report is not made anonymously- and those of the individual subject to the report) and the facts reported. These details are obtained directly from the whistleblower at the moment that they file a report through the system.

A report may be made anonymously without providing any personal data, although the Controller may need to request additional information during the course of any subsequent investigation.

Similarly, any personal data considered excessive or inappropriate will be removed from the information provided in the report.

3. INFORMATION PROVIDED TO THE INDIVIDUAL SUBJECT TO THE REPORT

The individual subject to the report will be informed in accordance with the terms set out in Article 14 of the GDPR no later than 1 month following receipt of the report of concern.

In the exceptional case that such communication can be reasonably understood to pose an obstruction or risk to the proper investigation of the facts, such communication shall be postponed to the earliest possible date on which there is deemed to be no such risk.

4. PURPOSES AND LEGITIMACY

The data to be processed will be used for the following two purposes:

- To manage the internal whistleblowing procedure that it forms a part of, in relation to illegal acts or misconduct, breaches of the company's procedures or rules or violations of any sector regulations that apply to the company.
- Adoption of the appropriate disciplinary measures following the resolution of the whistleblowing procedure.

Such processing is legitimised by way of legal obligation, by virtue of the provisions for companies with more than 50 employees in Article 30 of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption.

5. RETENTION PERIODS AND CRITERIA

Data will be kept in the whistleblowing channel system for no longer than 3 months following receipt of the report of concern.

In the event that the data needs to be processed for a longer period of time to further investigate the facts or apply appropriate disciplinary measures, it will be processed for as long as required in a different system. Access to the data will be subsequently blocked until any applicable state of limitations has run its course in case it is required by future legal proceedings.



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In the event that it is decided that the report is inadmissible following investigation, the information will be deleted within a maximum period of 3 months from receipt of the report of concern.

6. ASSIGNMENT OR TRANSFER OF DATA

No data shall be shared with third parties except the courts and competent authorities in connection with potentially criminal or administrative offences.

The sharing of information to a company belonging to the Aludec Group due to its relationship with the whistleblower or the individual subject to the report will not be understood as an assignment or transfer of data, having been indicated in point 1 that the company will share responsibility for the data along with Aludec S.A.

No processed data will be transferred internationally to anywhere outside the European Economic Area.

You are hereby informed that the following companies have been appointed by the Aludec Group as data processors for the management of the whistleblowing channel:

- DISEÑO Y SOFTWARE WINDSOCK S.L. for the technical management and maintenance of the whistleblowing channel.

7. RIGHTS

The following data protection rights may be exercised through the channels indicated. Except in cases of an anonymous submission, the data subject will be required to attach a scanned copy of their national ID card, indicating the right that they wish to exercise and providing the number of the procedure that has been communicated to them.

- The right to request a copy of the personal data being processed. This shall be provided within one month from the date of request (right of access). Please note that any exercise of this right by an individual subject to a report will be limited to their own personal data and will not include personal data relating to other data subjects or the whistleblower's identity.
- The right to update or amend information if it is incorrect (right of rectification).

- The right to request that we stop using the information while a case is being resolved, as well as at other times (right to restriction of processing).

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canaldenuncias@aludec.com. Contact address for non-report-related data protection matters:
protecciondatos@aludec.com

Similarly, please note that you have the right to lodge a complaint with the Spanish Data Protection Agency (or AEPD), particularly if you are not satisfied with the exercise of your rights in this matter.