

Information about the processing of personal data in Taptap's Whistleblowing Channel

1. Data Controller

The personal data you provide will be processed by Taptap Digital, S.L. ("**Taptap**"), with Tax ID No. B85914182 and registered office at Calle del Poeta Joan Maragall nº 1, planta 14, 28020 - Madrid, as the data controller of the internal information system. For any communication regarding your privacy, you can contact Taptap at privacy@taptapnetworks.com, or DWF-RCD as Taptap's data protection officer at dpoprivacy@dwf-rcd.law.

2. Purpose of the processing

We will process your data under the protection of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory violations and the fight against corruption (the "**Spanish Law on Whistleblower Protection**"), in order to manage the notifications we receive in our Internal Information Channel about the reported events, to investigate said events or to adopt the pertinent corrective measures and to inform you, once the investigation is concluded, about the result of the investigations carried out.

In particular, the data that we will process may include the following categories: identification data, data referring to your personal characteristics and social circumstances, contact details, academic and professional data, economic, financial and insurance data. The personal data processed may have been provided by the data subject himself or herself or by third parties.

3. Basis of legitimacy

In accordance with Article 6.1.c of the GDPR, data processing is necessary for the fulfilment of the obligations provided for in the Spanish Law on Whistleblower Protection.

Information received containing data considered to be of a special category will be deleted immediately, without being recorded and processed, provided that such data are not necessary to carry out the investigation and unless the processing is carried out for reasons of essential public interest, pursuant to Article 9.2.g) of the GDPR.

In the case of complaints dealing with matters related to harassment, personal data will be processed in accordance with Spanish Organic Law 10/2022, of 6 September, on the comprehensive guarantee of sexual freedom.

4. Data retention period

Personal data relating to information received and internal investigations carried out for this purpose will only be kept for the period of time stipulated in the Spanish Law on Whistleblower Protection. In particular, the provisions of sections 3 and 4 of Article 32 of said Law will be taken into account. Under no circumstances may data be kept for a period of more than ten years in the corresponding register.

However, in exceptional circumstances, Taptap reserves the right, in order to be able to exercise its rights of defence with full guarantees, to keep the complaint files duly blocked for a maximum period equivalent to the limitation period that applies in each case to the alleged criminal offence, or the alleged administrative offence reported.

5. Recipients of the data

Personal data will be treated confidentially unless they are made anonymous, in which case no personal data will be processed.

Access to the data will be limited exclusively to those responsible for the Internal Information System, as well as to those responsible for the adoption of disciplinary measures derived from the facts that are the object of investigation.

With full respect for the identity of the whistleblower under the terms of the Spanish Law on Whistleblower Protection, their personal data may be communicated to (i) public authorities and/or administrations, in the exercise of their legal functions; or (ii) third parties on whom Taptap may rely for the management of its Internal Information Channel (data hosting platforms, providers to whom the investigation may be delegated, lawyers or other types of external advisors or consultants).

6. Exercise of rights

You may exercise your rights of access, rectification, erasure, objection, restriction of processing and portability in relation to the personal data you have provided to us by emailing privacy@taptapnetworks.com.

If you consider your rights to have been violated, you can contact the Taptap data protection officer (dpoprivacy@dwf-rcd.law) or, if they do not respond to your request, you can file a complaint with the Spanish Data Protection Agency (www.aepd.com).