**DATA PROTECTION NOTICE IN THE CONTEXT OF WHISTLEBLOWING REPORTING**

This notice is about the processing by DESFA S.A. (357-359 Messogion Avenue 152 31 – Halandri, Greece, Tel.: (+30) 213 0884000, Email: [desfa@desfa.gr](mailto:desfa@desfa.gr)) (“Company” or “We”) as a Data Controller, of your personal data in the context of your reporting as per the Company’s Whistleblowing Policy. It explains what information we collect about you and for which purposes, how we will use that information, who we will share it with, and what steps we take to make sure it remains private and secure.

**How we will use your information and why**

Where you provide personal data, the Company processes them in order to manage and investigate your concern(s). We will hold the personal information you provide to us confidentially and securely and use it strictly to process your whistleblowing report, according to the Whistleblowing Policy of the Company. More specifically this will enable the Company to:

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| --- | --- |
| **LEGAL BASIS** | **PURPOSES** |
| Legitimate interest of the Company / Vital interest of the reporting party | * Investigate and evaluate the whistleblowing report * Manage communications with you in the process * Take action following a decision by the Ethics Committee |

**What personal data we collect and who has access to it**

In order to process your report, we will ask for communication details and identification data, although identification data are not mandatory for you to provide.

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| **CATEGORIES OF PERSONAL DATA** | **INDICATIVE EXAMPLES** |
| Identification data: | * Name * Surname |
| Communication data: | * Phone number * Email * Post address |

We recognise, however, that the personal information in a whistleblowing report can go beyond the above. Furthermore, we may ask for further information, along with any supporting documents or evidence, so that we can investigate your concern(s).

If the information you provide us in relation to your report contains special category data, such as health, religious or ethnic information etc, the lawful basis we will rely on is your consent to process them according to this notice, by your answering positively in the lower part of this notice.

Your personal data are processed by the Internal Audit function, according to the Whistleblowing Policy of the Company. Internal access to information as part of the whistleblowing management process is only granted to limited individuals, who need to have access to it, in order to manage, investigate and respond to your report and who are aware of their duties regarding confidentiality.

Furthermore, your personal data may be shared with the members of the Ethics Committee and/or the members of the Audit Committee and/or the Management Office and/or the Legal & Governance Division and/or HR Division, as needed for the exercise of their responsibilities as per the Whistleblowing Policy, insofar as you have provided your consent to that effect, by answering positively in the lower part of this notice.

Your personal data may also be sent to the following third parties:

* Companies, acting as data processors on the Company’s behalf, such as IT service providers and external consultants, strictly as needed for the purposes mentioned above;
* Public authorities, such as supervisory, law enforcement, administrative and judicial authorities in the exercise of their functions, when necessary or required by applicable law or court decision.

In the situations where we will need to share the information you send to us with third parties, such as public authorities and service providers, we will ensure that any request for confidentiality and anonymity is respected to the largest extent possible.

Our aim at all times is to ensure as far as possible the confidentiality of the information received and to protect your identity and the identity of all other persons involved. You should, however, recognize that you might be identifiable by others due to the nature or circumstances of your concern. Moreover, protection of confidentiality may not apply where you have intentionally revealed your identity in the context of a public disclosure.

**Where your personal data is stored and how long we keep it**

We have taken appropriate technical and organizational measures to ensure the security, integrity and availability of your personal data and compliance with the applicable data protection laws. We have internal policies and controls in place to manage the risk of loss, accidental destruction, misuse or disclosure and have in place separate, secure channels for receiving and handling your report. Your personal data will be stored as per the Whistleblowing Policy of the Company and access to this information will be strictly controlled and reviewed.

We will retain and process your personal data only for the period of time required to pursue the purposes described in this notice. In this respect, the Company will hold details of your whistleblowing disclosure, including your personal data, for five (5) years from the end of the year when the case is closed. We may retain your data for a longer period of time, if this is necessary to defend our rights and lawful interests before any competent court and any other public authority, up to the limitation period of the relevant claims.

**Transfer of your data**

As a rule, we will not process your data outside of the European Economic Area. Should we do so, we will ensure that either derogations or appropriate safeguards for the protection of your personal data are in place, as per the General Data Protection Regulation, especially the standard contractual clauses of the European Commission.

**Your rights**

Subject to applicable law, you have the following rights in relation to your personal data we keep:

* Right to Access regarding the information we keep about you and process.
* Right to Rectify your personal data if they are not accurate or incomplete.
* Right to Erasure of your personal data if there is no longer a reason to process them. However, we may continue to process your data if required by law.
* Right of Objection, i.e., you can object to any further processing of your personal data as long as there is no legal reason for such a processing.
* Right to Restrict the processing of your personal data by us.
* Right to Data Portability, i.e., you can request to send of your personal data in a portable format.
* Right to Lodge a Complaint with the Data Protection Authority (L. Kifisias 1-3, 11523, Athens, phone: +30 210 -6475600, [contact@dpa.gr](mailto:contact@dpa.gr)).

For more information regarding the processing of your personal data as well as to exercise your rights, you can contact our Data Protection Officer (DPO) via the following email: dpo@desfa.gr.

***The undersigned, having read and been informed on the above mentioned purposes and terms of processing of my personal data, I consent/do not consent to the following processing:***

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| --- | --- | --- |
| **PROCESSING** | **CONSENT** | **DO NOT CONSENT** |
| Processing of special categories of personal data, eg health, ethnic,  religious beliefs (if and as applicable) |  |  |
| Sharing with the Ethics Committee / Audit Committee / Management Office  Legal & Governance Division / HR Division (as necessary) |  |  |

***OR I CONSENT only for what is defined hereinbelow:***

**…………………………………………………………………………………………………………………………………………………………....**

**Date: …………………..**

**Name:………………………………………………..**

**Signature:………………………………………………**