

# PRIVACY POLICY

## ETHICAL CHANNEL

### GROUP PLAIN CONCEPTS



**plain**  
**concepts** 



## ADDITIONAL INFORMATION ABOUT DATA PROTECTION – ETHICAL CHANNEL-

PLAIN CONCEPTS Group is committed to the protection of your privacy and to the compliance with the legislation on personal data protection, specifically, with the General Data Protection Regulation (hereinafter, GDPR) and the legislation on personal data protection applicable in each country where the different companies of PLAIN CONCEPTS Group are located. The processing of personal data carried out by the PLAIN CONCEPTS Group shall be carried out in accordance with the principles of loyalty, lawfulness, appropriateness and transparency, always in accordance with specific, explicit and legitimate purposes. The PLAIN CONCEPTS Group undertakes to keep your data up to date and to keep them only for the time necessary to fulfil the purposes of the processing.

In the same way, PLAIN CONCEPTS Group guarantees that it complies with the duty of secrecy, confidentiality and respect of the personal data provided by the interested party in this Channel.

The access of personal data stored in the Whistleblowing Channel shall be limited to persons within or outside PLAIN CONCEPTS Group who perform internal control and compliance functions. However, other persons within the PLAIN CONCEPTS Group may have access to the data in those cases in which it is necessary to proceed with the management and resolution of the report made.

### 1. Who is the Controller of the data processing?

Entity of PLAIN CONCEPTS Group where the where the reported infringement occurred

Trade Name	Registered office
Plain Global Solutions S.L.	C/Gran Vía Don Diego López Haro, Bilbao (Spain)
Plain Concepts S.L.U.	C/Gran Vía Don Diego López Haro, Bilbao (Spain)
Plain Concepts UK LTD	Delta Place, 27 Bath Road, Cheltenham, Gloucestershire GL53 7TH (U.K.)
Plain Concepts Corporation INC	8201 164 <sup>th</sup> Ave Ne, Redmond, WA 98052 (EE.UU.)
Plain Concepts GmbH	Stapelkai 3, 50735, Köln (Germany)
Plain Concepts RO S.R.L.	Frumoasă, Nr. 30, MODUL 1.25, Floor, Bucharest (Romania)
Plain Concepts Benelux B.V.	Ever Van de Beekstraat 354, 118cz, Schipol, 118cz (Netherlands)
Sidra Data Services S.L.U.	C/Gran Vía Don Diego López Haro, Bilbao (Spain)

We also inform you that Plain Concepts has a designated Data Protection Officer (hereinafter DPO), who can be contacted through the address [dpo@leasba.com](mailto:dpo@leasba.com)

## 2. For what purpose do we process your personal data?

Plain Concepts processes your personal data for the purpose of managing, investigating and resolving the communication made by the interested party, in relation to the alleged commission of actions within the organisation that may be contrary to the Plain Concepts Code of Ethics or the Law.

For the purpose of fulfilling this objective, Plain Concepts treats the following personal data:

- Identifying data of the user: Name, Surname and email and if so the telephone number.
- Description of the fact that you want to report, which involves a violation of the Code of Ethics or the legal system, including all relevant data to detail the case.
- The data and information that you provide about the persons involved in the event, as well as the witnesses that you list.

## 3. Which is the legitimation for the processing of your personal data?

The legal basis, in accordance with the article 6 GDPR, for the processing of your personal data, is the following:

- **Compliance with a legal obligation (Art. 6.1 c GDPR):** the basis of the legitimation of the processing will be the compliance with a legal obligation in cases where the sectoral regulations are applicable to PLAIN CONCEPTS Group.
- **Fulfilment of a task carried out in the public interest or in the exercise of public authority vested in the controller (Art. 6.1.e GDPR):** In cases where the processing is voluntary or carried out in the context of public disclosure.

## 4. To whom will your data be disclosed?

- The person responsible for human resources management in relation to a disciplinary procedure.

- The person responsible of the legal services and/or the Compliance Officer of the Company, in the event of the initiation of the corresponding legal actions.
- The processors:
  - a) Plain Concepts Group's independent compliance consultancy service providers for the handling and management of communications.
- State Security Forces and Corps, Public Administrations, with jurisdiction over the reported actions, Courts of Justice and other jurisdictional bodies, in the cases provided for in the Law and for the purposes defined therein.

#### **5. Transfer of data to third countries**

The Internal Information System platform is hosted within the European Economic Area. However, occasional international transfers of personal data may be carried out within the scope of service support or if certain Plain Concepts Group companies are involved, in which case appropriate safeguards will be implemented in accordance with applicable regulations.

#### **6. How long Will we keep your data?**

The personal data provided will be processed for the time necessary to manage and resolve the communication made (and will be kept in the information system only for the time necessary to decide whether to initiate an investigation into the reported facts).

If some or all of the information provided is found to be false, it shall be deleted immediately upon becoming known, unless such falsehood could constitute a criminal offence, in which case the information shall be retained for as long as necessary for the duration of the legal proceedings.

In any case, the data will be kept for a period not exceeding three months from the time the data are entered. Once this period has elapsed, the data will be anonymised.

#### **7. What are your rights?**

You may exercise your rights under the current data protection regulations (access, rectification and deletion of your data, data portability, limitation or opposition to data processing, the right not to be subject to automated decisions, as well as the right to obtain clear and transparent information about data processing).

The interested party may exercise their rights by sending an e-mail to [gdpr@plainconcepts.com](mailto:gdpr@plainconcepts.com), indicating the reason for their request and the right they wish to exercise. If we consider it



necessary to identify you, we may request a copy of a document proving your identity. You may also send a communication to the Data Protection Delegate by sending an e-mail to [dpo@leasba.com](mailto:dpo@leasba.com)

In those cases in which you feel that your rights concerning the protection of your personal data have been violated, especially when you have not obtained satisfaction in the exercise of your rights, you may file a complaint with the Data Protection Supervisory Authority;

For **Plain Global Solutions S.L., Plain Concepts S.L.U. and Sidra Data Services S.L.U.:**

- La Agencia Española de Protección de Datos, Web: [www.aepd.es](http://www.aepd.es).

For **Plain Concepts UK LTD:**

- Information Commissioner's Office, Web: [www.ico.org.uk](http://www.ico.org.uk).

For **Plain Concepts GmbH:**

- Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen, Web: [www.lidi.nrw.de](http://www.lidi.nrw.de)

For **Plain Concepts RO S.R.L.:**

- Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal, Web: [www.dataprotection.ro](http://www.dataprotection.ro)

For **Plain Concepts Benelux B.V.:**

- Autoriteit Persoonsgegevens, Web: [www.autoriteitpersoonsgegevens.nl/nl](http://www.autoriteitpersoonsgegevens.nl/nl)

