

Whistleblowing channel privacy policy

The whistleblowing channel of NOVICAP SPAIN, S.L. and its group ("NOVICAP"), is the means through which employees, suppliers, clients, and third parties with a legitimate interest can report irregular conduct, violations of the law, internal regulations, or corrupt behaviour within this group, which may constitute a criminal offence under Law 2/2023, of 20 February, regulating the protection of whistleblowers who report regulatory breaches or corruption.

NOVICAP SPAIN, S.L., with registered offices at Avenida Diagonal 618, Planta 7F, 08021 Barcelona, and holder of Spanish Tax ID number (NIF) B10647253, is responsible for the processing of personal data provided through this channel and expressly informs that they may be communicated to other third parties as data processors, for the appropriate management of whistleblower reports. All whistleblower reports shall be treated with the utmost confidentiality and for the purpose of investigating, processing, and resolving any whistleblower reports submitted, anticipating and, if necessary, correcting any irregular and/or unlawful behaviours or behaviours contrary to NOVICAP's internal regulations. Under no circumstances may it be used as a suggestion box or customer service channel.

Personal data shall be retained for the time necessary to decide on the appropriateness of initiating an investigation into the reported facts.

However, should a judicial procedure be initiated after the investigation process, data may be retained for the additional time necessary until a final judicial resolution is obtained.

Whistleblower reports may be submitted anonymously or identified. For identified whistleblowers, NOVICAP shall implement protective measures against any reprisals in accordance with the law. Whistleblower reports may preferably be submitted electronically by clicking on the link enabled at the end of this Policy, after accepting it. The person responsible for this whistleblower channel is the Compliance Officer of NOVICAP, who shall receive them and, if required, forward them to the Investigating Responsible, who shall act in accordance with the internal investigation procedure.

Only the following individuals may access whistleblower reports:

1. The whistleblowing channel manager and those who directly manage it.
2. The HR manager or the Investigating Responsible, only when disciplinary measures against an employee may be necessary.
3. The Data Protection Officer.
4. Data processors or sub-processors that may be designated.

Any whistleblower reports or communications with criminal implications shall necessarily involve the initiation of a file by the Investigating Responsible and, if necessary, communication to the Police, competent Authorities, and/or the Courts justice.

For its admission and proper processing, whistleblower reports or complaints made must necessarily contain the following details:

1. Identification of the whistleblower, except for anonymous whistleblower reports.
2. A succinct statement of the facts or arguments supporting the communication/report and the provision of documents or witnesses deemed appropriate.
3. The person or department against whom the communication/report is directed.
4. The place or address where the events occurred.

NOIVCAP shall take all necessary technical and organizational security measures to prevent the alteration, loss, and unauthorized processing or access to such data and thus ensure their security.

Whistleblowers may exercise their rights of access, rectification, opposition, deletion, limitation of processing, and portability by sending an email to the address dpo@novicap.com. In the case of anonymous whistleblower reports, the whistleblower shall not be able to exercise such rights.