

INFORMATION CLAUSE REGARDING REPORTS OF BREACHES OF LAW, ADDRESSED TO THE WHISTLEBLOWER, THE ALLEGED PERPETRATOR, WITNESSES, AND THIRD PARTIES

In accordance with Article 13 and Article 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter "GDPR"), we inform you that:

I. **Personal Data Controller**

The Controller of your personal data is Printbox Sp. z o.o., ul. Fabryczna 20A, 31-553 Kraków, KRS No.: 0000484669, NIP (Tax Identification Number): 6762470210, REGON (National Business Registry Number): 122987871.

II. **Data Protection Officer**

The Controller has appointed a **Data Protection Officer (DPO)** whom you can contact in all matters regarding the processing of your personal data and the exercise of your rights related to data processing.

You can contact our DPO via e-mail at: DPO@getprintbox.com or by post at the Controller's registered office address with the note: "Data Protection Officer".

For routine matters regarding the ongoing handling of reports, you may also contact the Controller via e-mail at: gdpr@getprintbox.com or by post at: Printbox Sp. z o.o., ul. Fabryczna 20A, 31-553 Kraków.

III. **Purposes and Legal Bases for Processing Personal Data**

Your personal data will be processed for the following purposes and on the following legal bases:

1. **Receiving, verifying, and conducting explanatory proceedings** in connection with reports of breaches of law, in accordance with the Act of 14 June 2024 on the protection of persons reporting breaches of law (hereinafter "Whistleblower Protection Act") – the legal basis for processing is **Article 6(1)(c) of the GDPR** (processing is necessary for compliance with a legal obligation to which the Controller is subject) in conjunction with the provisions of the Whistleblower Protection Act.
2. **Taking follow-up actions** in connection with a submitted report, including corrective, preventive, or disciplinary actions – the legal basis for processing is **Article 6(1)(c) of the GDPR** and **Article 6(1)(f) of the GDPR** (processing is necessary for the purposes of the legitimate interests pursued by the Controller, such as ensuring the Company's compliance with the law, protecting its property and good name, ensuring security).

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3. **Protecting the identity of the reporting person (whistleblower)**, the person to whom the report relates, and third parties indicated in the report – the legal basis for processing is **Article 6(1)(c) of the GDPR** in conjunction with the provisions of the Whistleblower Protection Act.
4. **Maintaining an internal register of reports** – the legal basis for processing is **Article 6(1)(c) of the GDPR** in conjunction with the provisions of the Whistleblower Protection Act.
5. **The possible establishment, pursuit, or defense against claims** – the legal basis for processing is **Article 6(1)(f) of the GDPR** (legitimate interest of the Controller).
6. **Fulfilling archiving obligations** – the legal basis for processing is **Article 6(1)(c) of the GDPR** in conjunction with legal provisions concerning archiving.

IV. Categories of Personal Data Processed

In connection with the breach reporting procedure, the Controller may process the following categories of personal data:

1. **Persons making the report (whistleblowers):** a. Identification data, b. Contact details (e.g., e-mail address, phone number – if provided), c. Position or type of legal relationship connecting the whistleblower with the Company, d. Content of the report, including a description of the breach and any information provided by the whistleblower.
2. **Persons to whom the report relates (persons indicated as committing the breach):** a. Identification data (name, surname), b. Job position, c. Information concerning the alleged breach contained in the report and collected during the explanatory proceedings.
3. **Third parties (e.g., witnesses) indicated in the report or identified during the explanatory proceedings:** a. Identification data (name, surname), b. Contact details, c. Information related to the subject of the report.

V. Recipients of Personal Data

Access to your personal data may be granted to:

1. Authorized employees or associates of the Controller who are obliged to maintain confidentiality and are responsible for receiving and processing reports (e.g., members of the HR team, members of the Strategy team, in accordance with internal procedure).
2. Entities processing personal data on behalf of the Controller, based on data processing agreements, e.g., IT service providers, legal advisors, auditors – solely to the extent necessary to achieve the aforementioned purposes.
3. Public authorities authorized to request data based on applicable legal provisions (e.g., courts, prosecutor's office, control bodies), if such an obligation arises from legal provisions.

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VI. Transfer of Personal Data to Third Countries

Your data **will not be** transferred to third countries or international organizations.

VII. Personal Data Retention Period

1. Personal data collected in connection with internal reports will be stored for the period necessary to achieve the purposes for which they were collected, in particular for the duration of the explanatory proceedings and follow-up actions.
2. In accordance with Art. 28(1) of the Whistleblower Protection Act, personal data collected in the internal reports register shall be stored **for no longer than 3 years** from the end of the calendar year in which the follow-up actions taken in connection with the report were completed, or from the end of the proceedings initiated by these actions.
3. If data processing is necessary for the establishment, pursuit, or defense of claims, the data may be stored for the limitation period of such claims.

VIII. Rights of Data Subjects

In connection with the processing of your personal data, you have the following rights:

1. **The right of access to data** (Article 15 GDPR),
2. **The right to rectification of data** (Article 16 GDPR),
3. **The right to erasure of data ('right to be forgotten')** (Article 17 GDPR) – subject to limitations arising from legal provisions, including the Whistleblower Protection Act,
4. **The right to restriction of processing** (Article 18 GDPR),
5. **The right to data portability** (Article 20 GDPR) – if processing is based on consent or a contract and is carried out by automated means,
6. **The right to object to data processing** (Article 21 GDPR) – if processing is based on Article 6(1)(f) of the GDPR (legitimate interest of the Controller).

Requests regarding the exercise of the above rights should be sent to the e-mail address:

gdpr@getprintbox.com or in writing to the Controller's registered office address.

In all matters related to the processing of your personal data and to consult your rights, you can also contact our Data Protection Officer directly (contact details in Section II).

We also inform you that you have the right to lodge a complaint with the supervisory authority – the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych), address: **ul. Stanisława Moniuszki 1A, 00-014 Warszawa, Poland**.

IX. Voluntariness of Data Provision / Obligation to Provide Data

1. For the Whistleblower: Providing data is voluntary, however, it is necessary for the acceptance and consideration of the report. Anonymous reports will be rejected.

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2. For persons to whom the report relates and for third parties: The processing of your personal data is a consequence of a report made by a whistleblower and is necessary for the Controller to fulfill its legal obligations under the Whistleblower Protection Act and to pursue its legitimate interests. This data is obtained from the report or during the explanatory proceedings.

X. **Automated Decision-Making and Profiling**

Your personal data will not be subject to automated decision-making, including profiling.

XI. **Changes to the Information Clause**

The Controller reserves the right to make changes to this Information Clause. The Controller will inform about any changes on the Company's website.

We inform you that personal data has been obtained in connection with a report of a breach of law. In accordance with applicable regulations, in particular the Act of 14 June 2024 on the protection of whistleblowers, we do not disclose information about the source of personal data to ensure the protection of the identity of the reporting person, unless that person has given explicit consent thereto or does not meet the conditions specified in Art. 6 of the aforementioned Act.