

Information clause for whistleblowers

I. Personal Data Controller (Controller)

Grant Thornton Legal Szysz spółka komandytowa with the registered seat in Poznań, at ul. Abpa. A. Baraniaka 88 E (61-131 Poznań), entered into the Register of Entrepreneurs under KRS number 0000444633.

The Controller does not have a Data Protection Officer as it is not legally obliged to appoint one.

If you have any questions on data protection, please contact us at: iod@pl.gt.com.

II. Purposes and legal bases of personal data processing

No.	Purpose of processing	Legal basis	Period of processing
1.	Acceptance of a report and investigation of the report in accordance with the Whistleblower Protection Act	Article 6(1)(c) of GDPR (legal obligation)	For 3 years after the end of the calendar year, in which the follow-up activities were completed, or after the completion of the proceedings initiated by these activities. Personal data that are not relevant to the case, are not collected, and if accidentally collected, they are immediately deleted. The deletion of such personal data shall take place within 14 days after it is determined that it is not relevant to the case.
		Regarding sensitive data: Article 9(2)(a) of GDPR (explicit consent)	
2.	Assertion and defence of claims	Article 6(1)(f) of GDPR (legitimate interest)	For the period of the statute of limitations for claims (10 years counted from the end of the calendar year in which you filed the report).
		Article (9)(2)(f) of GDPR (if sensitive data are necessary for the establishment, assertion or defence of claims)	

III. Data recipients

Personal data received by the Violations Commissions will not be passed on to anyone else in Grant Thornton.

However, we may share personal data with service providers:

- in terms of servicing the whistleblower reporting channel,
- archiving and document destruction,
- technical services, primarily related to the maintenance and delivery of IT systems, IT infrastructure and websites,
- courier and postal services,
- insurance.

IV. Transfer of personal data to a third country

Personal data will generally not be transferred outside the European Economic Area (EEA) or made available to international organizations. If we decide to use the services of suppliers from outside the EEA, the transfer of data will be always based on the decision of the European Commission stating the appropriate level of protection of personal data, and in the absence of such decision, the transfer takes place on the basis of standard contractual clauses adopted by the European Commission (Commission Implementing Decision (EU) 2021/ 914 of June 4, 2021 on standard contractual clauses regarding the transfer of personal data to third countries pursuant to the GDPR).

If you want a copy of standard contractual clauses or information about the security measures used in data transfer, please write to the address given in point I.

V. Catalogue of data subjects' rights

You have the following rights:

- a. to access your personal data,
- b. to correct (rectify) the data,
- c. to have the data erased (unless the criteria provided for in Article 17(3) of GDPR are satisfied),
- d. to restrict the processing,
- e. to data portability,
- f. to file a complaint with the Personal Data Protection Office (in Poland: Prezes Urzędu Ochrony Danych Osobowych).

We would like to point out separately that you have the right to object to the processing if it is based on the so-called legitimate interest of the Controller [Article 6(1)(f) of the GDPR - see the table in point II].

VI. Automated decision making, including profiling

We do not use profiling nor automated decision making, in the processing of personal data.