

Procedure for reporting (including anonymous reporting) violations of the law and ethical procedures and standards

§ 1 INFORMATION ABOUT THE PROCEDURE

1. **Scope of the Procedure.** The procedure specifies:
 - 1.1. objectives and rules for reporting Irregularities;
 - 1.2. the manner of reporting Irregularities, including anonymous reporting of Irregularities;
 - 1.3. the manner in which reports of Irregularities are handled and the manner in which records related to such reports are maintained;
 - 1.4. how to disseminate information about the possibility of anonymous reporting of Irregularities and the goals and principles under the Procedure.

§ 2 DEFINITIONS

1. **Meaning of definitions.** Capitalized terms used in the Procedure shall be understood as follows:
 - 1.1. **Retaliation** - a direct or indirect act or omission in a Work-Related Context that is caused by a report and that violates or may violate the rights of a Whistleblower, a Person associated with the Whistleblower, or a Whistleblower's helper, or causes or may cause unreasonable harm to a Whistleblower, Person associated with the Whistleblower or the Whistleblower's helper, including unjustifiably initiating proceedings against the Whistleblower, Person associated with the Whistleblower or the Whistleblower's helper, omission from promotion, reduction of remuneration, termination of employment or other contract, transfer to another position, mobbing, discrimination. Retaliation is also an attempt or threat of the above-mentioned actions.
 - 1.2. **Remedial actions** - actions aimed at removing the reported Irregularity and preventing the occurrence of similar Irregularities in the future.
 - 1.3. **Follow-up** - any of the actions referred to in § 8 of the Procedure.
 - 1.4. **Work-related Context** - past, present or future work-related activities connected with employment or other legal relationship underlying the provision of work or services or the performance of functions in or for the Company, where information about the Irregularities has been obtained and the possibility of experiencing Retaliation exists.
 - 1.5. **Violator** - a natural person, an organizational unit without legal personality, to which the law grants legal capacity, or a legal person identified by the Whistleblower in the report as the person who committed the Irregularity or is related to the Violator.
 - 1.6. **Person associated with the Whistleblower**- an individual who may experience Retaliation, including an associate or person most closely related to the Whistleblower, i.e. a spouse, ascendant, descendant, sibling, in-law in the same line or degree, a person in an adoption relationship and their spouse, as well as a person in cohabitation with the Whistleblower.
 - 1.7. **Company** - Captor Therapeutics S.A. with its registered office in Wrocław (address: ul. Duńska 11, 54-427 Wrocław), registered in the Register of Entrepreneurs of the National Court Register, kept by the District Court for Wrocław-Fabryczna, IV Commercial Division of the National Court Register under the number 0000756383, NIP: 8943071259; REGON: 363381765, with a share capital of 466,284.60 PLN.

- 1.8. **Subsidiary** - any company for which the Company is the parent company within the meaning of the Code of Commercial Companies;
- 1.9. **Whistleblower's helper** - an individual who assists the Whistleblower in making the report.
- 1.10. **Investigation** - the proceedings referred to in § 9 of the Procedure.
- 1.11. **Procedure** - this document.
- 1.12. **Investigator** - a person or group of persons appointed by the Report Receiver to conduct the Investigation.
- 1.13. **Report Receiver** - the person referred to in § 5.2 and § 5.4 of the Procedure.
- 1.14. **Act on Public Offering** - the Act of 29th of July, 2005, on Public Offering, the Conditions Governing the Introduction of Financial Instruments to Organized Trading and on Public Companies (i.e. Journal of Laws 2005, item 620).
- 1.15. **Act on the protection of Whistleblowers** - Law of 14th of June, 2024, on the protection of whistleblowers (Journal of Laws, item 928).
- 1.16. **Regulation 2017/1129** - Regulation (EU) 2017/1129 of the European Parliament and of the Council of 14 June 2017 on the prospectus to be published when securities are offered to the public or admitted to trading on a regulated market and repealing Directive 2003/71/EC (OJ EU. L. of 2017 No. 168, p. 12, as amended).
- 1.17. **Violations of the Act on the protection of Whistleblowers**- occurring in the Company or a Subsidiary in a Work-Related Context an act or omission that is unlawful or intended to circumvent the law, which concerns the following areas of the law (closed catalog):
 - 1.17.1. corruption;
 - 1.17.2. public procurement;
 - 1.17.3. services, products, and financial markets;
 - 1.17.4. anti-money laundering and countering the financing of terrorism;
 - 1.17.5. product safety and compliance;
 - 1.17.6. transportation security;
 - 1.17.7. environmental protection, radiological protection, and nuclear safety;
 - 1.17.8. food and feed safety;
 - 1.17.9. animal health and welfare;
 - 1.17.10. public health;
 - 1.17.11. consumer protection;
 - 1.17.12. privacy and data protection;
 - 1.17.13. network and ICT system security;
 - 1.17.14. financial interests of the Treasury of the Republic of Poland, the local government unit, and the European Union;
 - 1.17.15. the European Union's internal market, including public law competition rules and state aid rules, and legal persons e taxation;
 - 1.17.16. constitutional freedoms and rights of human and citizen occurring in the relations between an individual and public authorities and not related to the areas listed in paragraph 1.17.1. -1.17.15.
- 1.18. **Irregularity** - any alleged violations of law, in particular, violations of the Act on the protection of Whistleblowers, violations of the Act on Public Offering, Regulation 2017/1129,

- and violations of procedures, rules of conduct or ethical standards applicable to the Company or a Subsidiary, committed by persons acting for or on behalf of the Company or a Subsidiary;
- 1.19. **Whistleblower** - an individual who becomes aware of an Irregularity in a Work-related Context and reports the Irregularity under the Procedure. Specifically, a Whistleblower may be an employee of the Company, an employee candidate, a member of the Company's management board or a shareholder of the Company.

§ 3 PURPOSE OF THE PROCEDURE

1. **Purpose of the Procedure.** The purpose of the procedure is:
 - 1.1. building and promoting a culture of law compliance and reporting Irregularities as an expression of concern for the welfare of the Company or a Subsidiary, in particular through:
 - 1.1.1. enabling effective reporting of Irregularities;
 - 1.1.2. effective handling of reports of Irregularities;
 - 1.1.3. Whistleblower protection.
 - 1.2. reducing the risk of occurrence and limiting the consequences of Irregularities.

§ 4 GENERAL PRINCIPLES

1. **Persons authorized to report Irregularities.** Irregularity may be reported by a Whistleblower. This means that under the Procedure, reports cannot be made by persons who have obtained information about the Irregularity outside the Work-related Context.
2. **Method of reporting Irregularities.** Reporting may be done both anonymously and with the identity of the Whistleblower.
3. **Duties of the Whistleblower.** The Whistleblower shall be obligated to:
 - 3.1. report Irregularities in good faith,
 - 3.2. include in the report n all relevant information about the Irregularity in question,
 - 3.3. provide the necessary explanations during the initiated and ongoing Investigation.
4. **Effects of bad faith reporting.** In the event of a report of Irregularity in bad faith:
 - 4.1. The Whistleblower is not protected from Retaliation;
 - 4.2. The Whistleblower may incur civil liability (liability to pay damages or compensation for the harm suffered) to the person who suffered damages due to the reporting of the Irregularity in bad faith;
 - 4.3. A Whistleblower may face criminal liability under Article 57 of the Act on the protection of Whistleblowers, according to which "Whoever makes a report or public disclosure knowing that a violation of the law has not occurred shall be subject to a fine, restriction of liberty or imprisonment for up to 2 years."
 - 4.4. The Whistleblower's data without their consent may be given to the persons indicated by the Whistleblower in the report, if the provision of such data is justified by the circumstances of the case and is necessary for its clarification.

5. **Content of the report.** The Whistleblower in the Whistleblower report of Irregularities should indicate the contact address if they wish to be informed of the action taken by the Company and all details about Irregularities known to them, e.g.:
 - 5.1. dates and places of occurrence of Irregularities;
 - 5.2. nature and description of the Irregularity;
 - 5.3. persons associated with the Irregularity;
 - 5.4. witnesses and held evidence on Irregularities;
 - 5.5. potential effects of Irregularities.
6. **Rules of safe communication.** When reporting the Irregularity, the Whistleblower should keep in mind the rules of safe communication, i.e., if sending a document of a confidential nature (e.g., containing a PESEL number or so-called sensitive data), the Whistleblower should secure the document with a password, and send the password in a separate email message.
7. **Company's Obligations.** The Company shall:
 - 7.1. consider each report of Irregularities with due diligence, with the participation of persons authorized and obligated to maintain the confidentiality of information obtained in the course of considering the reports and ensuring its impartial consideration;
 - 7.2. not to carry out activities aimed at revealing the identity of Whistleblowers making anonymous reports;
 - 7.3. not to conduct against those who, according to the report, are responsible for the Irregularity, actions that may violate their rights or goods protected by law;
 - 7.4. notify the police, the prosecutor, or the relevant public administration authorities of the Irregularity - if such an obligation arises from the nature of the Irregularity and the findings made in the course of investigating the report.

§ 5 REPORTING IRREGULARITIES

1. **Primary address for reporting the Irregularities.** If the Irregularity does not relate to the actions of the members of the Company's management board, the Whistleblower may report the Irregularity as follows:
 - 1.1. by email to: **naruszenia@captortherapeutics.com**, indicating in the title of the message "CONFIDENTIAL - REPORT OF IRREGULARITY DELIVER IN PERSON TO THE PRESIDENT OF THE COMPANY'S MANAGEMENT BOARD";
 - 1.2. by regular mail to the address: ul. Duńska 11, 54-427 Wrocław, Poland, writing on the envelope:
"CONFIDENTIAL - REPORT OF IRREGULARITIES. DELIVER IN PERSON TO THE PRESIDENT OF THE COMPANY'S MANAGEMENT BOARD"
2. **Report Receiver.** The member of the Company's management board designated to consider the report of Irregularities referred to in point 1 of this paragraph 1 shall be the president of the Company's management board.
3. **Address for making reports on the members of the Company's management board.** If the Irregularity relates to the actions of the member of the Company's management board, the Whistleblower may make a report of the Irregularity as follows:
 - 3.1. by email to: **radanadzorcza@captortherapeutics.com**, indicating in the title of the message "CONFIDENTIAL - REPORT OF IRREGULARITIES";

3.2. by regular mail to the address: ul. Duńska 11, 54-427 Wrocław, Poland, writing on the envelope "CONFIDENTIAL - REPORT OF IRREGULARITIES. DELIVER IN PERSON TO THE CHAIRMAN OF THE SUPERVISORY BOARD."

4. **Report Receiver regarding the report concerning members of the Company's management board.** The member of the Company's supervisory board designated to accept the report of Irregularities referred to in point 3 of this paragraph is the chairman of the Company's supervisory board.
5. **Failure to comply with formal requirements.** Failure to comply with the formal requirements outlined in either point 1 or 3 of this paragraph and § 4 point 5 of the Procedure shall not suspend consideration of the report of Irregularities to the extent possible based on the information provided in the report.
6. **Anonymous reports.** An anonymous report will be processed in the same manner as a report with an identity, taking into account the limitations of not being able to know the identity of the Whistleblower (e.g., related to the difficulty of verifying the report or conducting Follow-Up).

§ 6 PROTECTION OF THE WHISTLEBLOWER AND THE INFORMATION COVERED BY THE REPORT

1. **Protection from Retaliation.** From the moment the Irregularities are reported, the Whistleblower who is a former employee, current employee, or employee candidate shall be protected from Retaliation. If the Report Receiver or the Investigator becomes aware of Retaliation against a Whistleblower, the Report Receiver or the Investigator are obliged to take the necessary measures to protect the Whistleblower, including holding the person who retaliates responsible. Undertaking Retaliation may be grounds for termination of the contract with the person who undertakes Retaliation.
2. **Extension of protection against Retaliation** The provision of point 1 of this paragraph shall apply mutatis mutandis to:
 - 2.1. Whistleblower's helper;
 - 2.2. Person associated with the Whistleblower;
 - 2.3. a legal entity or other organizational unit assisting or associated with the Whistleblower, in particular, owned or employed by the Whistleblower;
 - 2.4. Whistleblower who provides work or services on a legal basis other than an employment relationship, unless the nature of the work, services, or function provided or service performed precludes the application of such action to the Whistleblower.
3. **Restricted access to information.** Only the Report Receiver and the Investigator or the Company's advisors who are bound to confidentiality or professional secrecy may have access to the information covered by the report.
4. **Prohibition of disclosure of the identity of the Whistleblower and others.** The Company guarantees to keep confidential the identity of:
 - 4.1. Whistleblower;

- 4.2. Whistleblower's helper;
 - 4.3. Person associated with the Whistleblower;
 - 4.4. Violator;
 - 4.5. other person than above, indicated in the report.
5. **Prohibition of disclosure of information covered by the report.** Persons who participated in the Investigation (e.g., as witnesses) are prohibited from disclosing information about the reported Irregularities and the course of the investigation unless the person participating in the investigation is required to do so by law or has received the appropriate authorization from a member of the Company's management board.
 6. **Consequences of disclosing the identity of the Whistleblower and other persons.** Disclosure of the identity of the persons referred to in points 4.1.-4.3. of this paragraph may lead to criminal liability for the disclosing person under Article 56 of the Act on the protection of Whistleblowers, according to which: "Whoever, contrary to the provisions of the Act, discloses the identity of a whistleblower, a person assisting in making a report, or a person associated with a whistleblower, shall be subject to a fine, restriction of liberty, or imprisonment for up to one year."

§ 7 RECEIPT OF THE REPORT AND RECORD KEEPING

1. **Responsibilities of the Report Receiver.** The Report Receiver is responsible for forwarding the report to the authorized person, who:
 - 1.1. enters the report in the appropriate records, no later than the next business day, counting from the day of receipt of the report;
 - 1.2. sends the Whistleblower, to the contact address indicated by them, a confirmation of receipt of the report within 7 days, counting from the day of its receipt. This provision does not apply if the Whistleblower has not indicated a contact address.
2. **Separate Records.** Separate records are kept for the reports indicated in § 5.1 and § 5.3 of the Procedure, which the Company protects from unauthorized access.

§ 8 FOLLOW-UP

1. **Scope of the Follow-up.** Upon receipt of the report, the Report Receiver shall undertake the Follow-up, which may consist of the following:
 - 1.1. Investigation;
 - 1.2. Remedial actions.
2. **Request for additional information.** At any stage of the Follow-up, the Report Receiver or the Investigator may request the Whistleblower to provide information supplementing the report.
3. **External advisors of the Company.** At any stage of the Follow-up, the Report Receiver or the Investigator may involve the Company's external advisors who are bound by confidentiality or professional secrecy, if their participation is necessary to explain the Irregularity.

4. **Purpose of the Follow-up.** Follow-up is intended to establish:
 - 4.1. whether the reported Irregularity took place;
 - 4.2. what are the circumstances, nature, and possible consequences of the Irregularity;
 - 4.3. who is responsible for the creation of the Irregularity;
 - 4.4. what are the necessary Remedial actions that the Company or the Subsidiary should take in connection with the findings of the Irregularity, in particular, whether the Company or the Subsidiary should:
 - 1.1.1. notify the Police, prosecutor, or public administration authority of the Irregularity;
 - 1.1.2. take action on its own against those responsible for the Irregularity;
 - 1.1.3. take special measures to protect or compensate the Whistleblower who reported the Irregularity;
 - 1.1.4. introduce new procedures or instructions, or make changes to the Company's or the Subsidiary's existing procedures or instructions;
 - 1.1.5. introduce new or make changes to the model documents used by the Company or the Subsidiary;
 - 1.1.6. conduct training or other awareness-raising activities for the Company's or the Subsidiary's employees and other persons who act for and on behalf of the Company or the Subsidiary in order to reduce the risk of a recurrence of similar Irregularities.
5. **Report Receiver as the person in charge of the Follow-up.** Subject to point 6 of this paragraph Follow-up shall be supervised by the Company's president of the management board or the member of the Company's management board responsible for compliance with law, if such a person was appointed.
6. **The Report Receiver as the person conducting the Follow-up with regard to a member of the Company's management board.** Follow-up on the Irregularity that relates to the actions of the Company's management board's member shall be supervised by the chairman of the Company's supervisory board.

§ 9 INVESTIGATION

1. **Appointment of the Investigator.** ReportReceiver, taking into account the possible consequences of the Irregularity, the persons potentially responsible for creating the Irregularity and the extent of the information provided in the report of the Irregularity, shall designate, immediately after receipt and preliminary analysis of the report, from among the Company's employees or other persons (including persons with the relevant knowledge or experience needed to properly consider the report of the Irregularity) a person or group of persons responsible for conducting the Investigation, i.e. the Investigator.
2. **Responsibilities of the Investigator.** The Investigator shall:
 - 2.1. ensure the implementation of the objectives and principles set forth in the Procedure, including in particular § 3, § 4, and § 6.1. of the Procedure.
 - 2.2. conduct the investigation by consulting, to the extent necessary and reconcilable with the objectives and principles set forth in the Procedure, including in particular § 3 and § 4.7., § 6 and § 8.4. of the Procedure, with persons who have expert knowledge of the report in question, e.g., those responsible at the Company or Subsidiary for legal services, internal audit and personal data protection (including the personal data protection officer, if appointed).

3. **Powers of the Investigator.** The Investigator shall be authorized to access and analyze all documents and information of the Company and to request explanations from employees of the Company or a Subsidiary or other persons that may help to achieve the objectives of the Investigation as referred to in § 8.4. of the Procedure, as well as to perform other actions necessary to explain the reported Irregularity.
4. **Completion of the Investigation.** The Investigation shall end with the preparation by the Investigator of a report on the findings of the Investigation (the "**Final Report**"), which shall be submitted to the Report Receiver within 45 days from the date of appointment of the Investigator.
5. **Provision of Sub-Reports.** Upon each request of the Report Receiver and on a weekly basis until the preparation and submission of the Final Report, the Investigator is obliged to prepare and provide the Report Receiver with a report showing the current status of the findings of the Investigation (the "**Sub-Report**").
6. **Contents of reports.** At a minimum, the Final Report and the Sub-Report should include the Investigator's findings regarding the circumstances referred to in § 8 points 4.1.-4.3. of the Procedure and the Investigator's recommendations within the scope referred to in § 8 point 4.4. of the Procedure.
7. **Decisions on Remedial actions.** All decisions on Remedial actions shall be made by the Report Receiver, after reviewing the Final Report or Sub-Report, ensuring that the objectives and principles set forth in the Procedure are met.
8. **Feedback for the Whistleblower** Once the decision referred to in point 7 of this paragraph has been made, Report Receiver shall oblige the Investigator to provide the Whistleblower with information on the planned or undertaken Follow-up, together with the reasons for them, within 3 months, counting from the date of confirmation of receipt of the report, or 3 months from the expiration of 7 days from the date of filing the report, if the Whistleblower has not been sent confirmation of receipt of the report due to the lack of indication of a contact address. This provision does not apply if the Whistleblower has not indicated a contact address.

§ 10 PROTECTION OF PERSONAL DATA

1. **Data retention.** The Company permanently deletes or permanently anonymizes the data contained in the records and the data collected during the Investigation, which are relevant to the consideration of the report, after the expiration of 3 years after the end of the calendar year in which the Follow-up was completed or after the proceedings initiated by the Follow-up have ended. Personal data that is not relevant to the consideration of the report shall be deleted immediately, with a maximum of 14 days after the determination that it is not relevant to the case.
2. **Review of records.** Not less than once a year, the authorized person shall review the records and data collected during the Investigations to identify data to be permanently deleted or anonymized in accordance with point 1 of this paragraph.
3. **Processing of the Whistleblower's personal data.** The Company shall process the personal data of the Whistleblower in accordance with the principles set forth in Appendix A.
4. **Processing of personal data of the Violator and other persons.** The Company shall process the personal data of the Violator and other persons indicated in the report in accordance with the rules set forth in Appendix B.

§ 11 EXTERNAL REPORTS AND PUBLIC DISCLOSURE

1. **Method of making an external report.** A Whistleblower may report a Violation under the Act on the protection of Whistleblowers as an external report to the Ombudsman or a public body designated to undertake follow-up on a reported Violation under the Act on the protection of Whistleblowers without first making a report under this Procedure.
2. **Rules for making external reports.** Rules for making external reports to the Ombudsman or a public body can be found on the websites of these entities.
3. **Exclusion from the application of the provisions of the Act on the protection of Whistleblowers.** Chapters 4 (external reports) and 5 (public disclosure) of the Act on the protection of Whistleblowers do not apply to violations of the law that do not constitute a Violation under the Act on the protection of Whistleblowers.

§ 12 FINAL PROVISIONS

1. **Application of Procedure to the Company and the Subsidiary.** The Procedure is applicable to the Company and the Subsidiary.
2. **Effective date of the Procedure.** The Procedure shall enter into force on 26.09.2024 r.
3. **Storage location of the Procedure.** The current content of the Procedure is available at <https://captortherapeutics.com/investor-relations/corporate-documents-and-governance/corporate-documents>
4. **Notification to employees of changes to the Procedure.** The Company shall notify its employees and employees of the Subsidiary by email of the effective date of the Procedure and of any changes made to the Procedure.
5. **Training.** The Company shall ensure that at least once every two years, each employee of the Company and of the Subsidiary shall receive training during which they shall be presented with the objectives and principles of the Procedure and how to report Irregularities.
6. **Reference to the Act.** To the extent not regulated by the Procedure, the provisions of the Act on the protection of Whistleblowers shall apply.

Appendix A

INFORMATION CLAUSE FOR SUBMITTING A REPORT

1. **Controller.** The Controller of your personal data is the Company or a Subsidiary (depending on which entity the Irregularity report relates to).
2. **Who can you contact about issues related to the processing of your personal data?** You can contact us on issues related to the protection of your personal data by sending an email to rodo@captortherapeutics.com.
3. **Purposes and legal grounds for processing your data.** We will process your personal data in order to process your report, maintain a record of your report, and undertake possible follow-up on the basis of Article 6(1)(c) of the GDPR in conjunction with the provisions of the Act on the protection of Whistleblowers, or on the basis of Article 9(2)(g) of the GDPR in conjunction with the provisions of the Act on the protection of Whistleblowers, if your report contains special category data (e.g., health data). In addition, we may process your personal data for the purpose of protecting and defending against possible claims, on the basis of Article 6(1)(f) GDPR (legitimate interest of the controller).
4. **To whom we may disclose your personal information?** We may disclose your personal data to: (1) the Company's external advisors who are bound to confidentiality or professional secrecy, if their participation is necessary to explain the Irregularity (e.g., a law firm); (2) state authorities, if we are obliged to do so by mandatory provisions of law.
5. **Will we transfer your personal data outside the EEA?** To a limited extent in case you use ICT tools, we may transfer your personal data outside the European Economic Area, especially to the USA, based on standard contractual clauses or binding corporate rules. You may obtain from the Company a copy of the document that forms the basis for the transfer of your personal data.
6. **How long will we keep your personal data?** We will keep your personal data for a period of 3 years after the end of the calendar year in which we completed the Follow-up or after the proceedings initiated by the Follow-up have ended. We will delete your personal data that is not relevant to the processing of your report within 14 days after we determine that it is not relevant to the case.
7. **What rights do you have in connection with the processing of your personal data?** You have the right to: (1) access your personal data; (2) request rectification, deletion, or restriction of processing; (3) object to processing; (4) lodge a complaint in connection with the processing of your personal data to the supervisory authority, i.e. the President of the Personal Data Protection Office in Warsaw; (5) portability of your personal data.
8. **Is it mandatory to provide personal data?** The provision of data is voluntary and does not affect the receipt of the report.
9. **Will we use your personal data to make automated decisions?** We will not use your personal data to make automated decisions or profile you.

Appendix B

INFORMATION CLAUSE FOR SUBMITTING A REPORT

1. **Controller.** The Controller of your personal data is the Company or a Subsidiary (depending on which entity the Irregularity report relates to).
2. **Who can you contact about issues related to the processing of your personal data?** You can contact us on issues related to the protection of your personal data by sending an email to rodo@captortherapeutics.com.
3. **Purposes and legal basis for processing your data.** We will process your personal data in order to process a report in which your personal data has been indicated, to keep a record of the reports, and to undertake possible follow-up, on the basis of Article 6(1)(c) of the GDPR in conjunction with the provisions of the Act on the protection of Whistleblowers, or on the basis of Article 9(2)(g) of the GDPR in conjunction with the provisions of the Act on the protection of Whistleblowers, if the report contains special category data (e.g., health data). In addition, we may process your personal data for the purpose of protecting and defending against possible claims, on the basis of Article 6(1)(f) GDPR (legitimate interest of the controller).
4. **To whom may we disclose your personal information?** We may disclose your personal data to: (1) the Company's external advisors who are bound to confidentiality or professional secrecy, if their participation is necessary to explain the Irregularity (e.g., a law firm); (2) state authorities, if we are obliged to do so by mandatory provisions of law.
5. **Will we transfer your personal data outside the EEA?** To a limited extent in case you use ICT tools, we may transfer your personal data outside the European Economic Area, especially to the USA, based on standard contractual clauses or binding corporate rules. You may obtain from the Company a copy of the document that forms the basis for the transfer of your personal data.
6. **How long will we keep your personal data?** We will keep your personal data for a period of 3 years after the end of the calendar year in which we completed the Follow-up or after the proceedings initiated by the Follow-up have ended. We will delete your personal data that is not relevant to the processing of your report within 14 days after we determine that it is not relevant to the case.
7. **What rights do you have in connection with the processing of your personal data?** You have the right to: (1) access your personal data; (2) request rectification, deletion, or restriction of processing; (3) object to processing; (4) lodge a complaint in connection with the processing of your personal data to the supervisory authority, i.e. the President of the Personal Data Protection Office in Warsaw; (5) portability of your personal data.
8. **Where did we get your data from?** Due to the protection of the identity of the Whistleblower, we cannot tell you the source of obtaining your personal data. We are authorized to do so by Article 8(5) of the Act on the protection of Whistleblowers.
9. **Will we use your personal data to make automated decisions?** We will not use your personal data to make automated decisions or profile you.