

## Privacy Notice for Whistleblowing Purposes

This Privacy Notice for Whistleblowing Purposes ('Privacy Notice') provides you with details, how we, **Sparring, s.r.o., advokátní kancelář**, with its registered seat at Perlová 371/5, 11000, Praha 1, Czech Republic, , ID.: 092 83 285, registered with the Czech Bar Association ('Sparring', 'we', 'our', 'us') process your personal data for the purpose of an internal whistleblowing system to notify the infringements that have occurred or are about to occur in connection with Sparring.

This Privacy Notice might be updated from time to time. The latest version of the Privacy Notice is effective as of **August 1, 2023**. You can always find an up-to-date version of the Privacy Notice on our [Website](#).

For the purposes of this Privacy Notice, the abbreviation "GDPR" means General Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data. Please be informed that the information provided in this Privacy Notice shall fulfill our information obligation based on art. 13 of GDPR and we use all our efforts to ensure our compliance with the applicable data protection legislation. Further, the term "AML Laws" means Act No. 253/2008 Coll., Act on Certain Measures against the Legalization of Proceeds of Crime and Terrorist Financing, as amended and Act No. 171/2023 Coll., Act on the Protection of Whistleblowers.

This Privacy Notice applies exclusively to the processing of personal data carried out by us as a data controller. This Privacy Notice does not deal with the processing methods and data protection practices of third parties for which we are not responsible. If other data controllers also process your personal data, you need to check their privacy notices. This Privacy Notice explains how we will use your personal data obtained directly from you. We do not anticipate processing of personal data of persons younger than 18 years old.

### 1. Whose data will be processed?

This Privacy Notice reflects processing of personal data of a person making a report under AML Laws, who can be directly or indirectly in any form of a legal relationship with Sparring ("you" or "your").

### 2. Why do we process your personal data, which data do we process and on which legal basis?

Main purpose for processing your data is to fulfill legal requirements and (i) to enable you to make a report under AML Laws, (ii) to allow us to process the report, and (iii) based on this report to take further actions required under AML Laws. We will process your data obtained directly from you in a limited scope, securely, only when we have a justified reason and legal basis for such processing and in compliance with GDPR and other applicable data protection legislation. You can find more details about processing of your personal data in the table below.

Purpose	Scope of processed data	Applicable legal basis
Making report in our internal whistleblowing system by various means	We may process your name, surname, date of birth, postal address, email address, phone number and other personal details you decide to provide us with, so we can identify you, unless you decide to submit an anonymous report. In such a case, we will process only your email address.	Art. 6 (1) (c) of GDPR for compliance with AML Laws and other relevant legal obligation to which we are subject
Communication with you about the content of the report to conduct the investigation	We may contact you with queries about your report and we may request you to provide us with additional information in order to process your report. The information may be provided in various forms (written, oral, video and audio recording).	Art. 6 (1) (c) of GDPR for compliance with AML Laws and other relevant legal obligation to which we are subject

Keeping records about your report in our internal whistleblowing system	We are obliged to keep records of all reports made within our internal whistleblowing system. In the records we may process your personal data such as name, surname, contact details (postal address, email address, phone number), date of birth, other details you shared with us as part of the reporting and investigation process.	Art. 6 (1) (c) of GDPR for compliance with AML Laws and other relevant legal obligation to which we are subject
Providing information about the outcome of the investigation	We may inform you about the outcome of the investigation performed based on your report and for this reason we may process your name, surname and contact details (postal address, email address, phone number).	Art. 6 (1) (c) of GDPR for compliance with AML Laws and other relevant legal obligation to which we are subject
Cooperating with the public authorities for the purpose of investigation	Based on your report the public authorities may conduct the official investigation and we are obliged to provide them with all personal data we dispose about you in relation to the report.	Art. 6 (1) (c) of GDPR for compliance with AML Laws and other relevant legal obligation to which we are subject
Fulfillment of our legal obligations	In relation to whistleblowing procedures, we may have various legal obligations, which require processing of your personal data. The precise scope of personal data we process for this purpose depends on the requirements imposed on us by the public authorities and by applicable law.	Art. 6 (1) (c) of GDPR for compliance with AML Laws and other relevant legal obligation to which we are subject
Dispute resolution, exercising and defending our claims	We may process your personal data for the purposes of solving legal disputes and claims related to the whistleblowing procedures and your report. Among other details we may process your name, surname, contact details (postal address, email address, phone number), date of birth, details you shared with us in the report or as part of the investigation and any other personal data that may be necessary and relevant for dispute solving or claim defending.	Art. 6 (1) (c) of GDPR for compliance with AML Laws and other relevant legal obligation to which we are subject  Art. (6) (1) (f) of GDPR for the purpose of our legitimate interest to handle disputes that may arise in relation to your report

When we process your personal data based on our legitimate interest under art. 6 (1) (f) of GDPR, you are entitled to object to such processing based on art. 21 of GDPR. If you decide to object to the processing, please send us a message on our email contact mentioned below.

If we are legally required to process personal data, you may have an obligation to provide us with that personal data. If you refuse to do so, it may have various legal consequences for you and for us, including adverse consequences (e.g., impossibility to perform relevant action).

### 3. With whom may we share your personal data?

For the purpose of the whistleblowing procedure, your personal information is treated as confidential and will be processed only by the competent person in Sparring, who needs to be provided with your data to investigate your report and perform necessary steps required by AML Laws. Furthermore, due to the nature of the whistleblowing procedure and depending on the content of your report, your data may be shared with the relevant public authorities, for example with tax authorities, law enforcement agencies or other governmental agencies.

### 4. Do we transfer your personal data to third countries?

We do not anticipate your data to be transferred to third countries for the above-mentioned purposes.

#### **5. How long do we process your personal data?**

We store your personal data as long as is necessary to fulfill the purpose mentioned in this Privacy Notice, for which the data were obtained, to pursue our legitimate interests and to comply with applicable laws. Based on the AML Laws, we are obliged to retain your personal data for period of 5 years, however note that we may process some of your personal data for longer period of time, if e.g.: (i) the applicable law requires us to do so, (ii) if there is an ongoing legal proceeding, or (iii) in exceptional cases, if you gave us the permission to keep your personal data on record for a longer period of time. The above stated period may be prolonged in case of the request of the relevant public authority or of the court.

#### **6. Are you subject to automated decision making or profiling?**

Your personal data are not used for automated decision-making or for profiling.

#### **7. Which measures do we use to protect your personal data?**

You can find information about measures we apply to protect your personal data in part 9. of our [Privacy Policy](#).

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

Based on GDPR you have several rights. Detailed overview of your rights can be found in part 7. of our [Privacy Policy](#).

#### **9. How can you contact us?**

If you have any questions or concerns about processing your personal data, please contact us on the following email address: [whistle@sparring.io](mailto:whistle@sparring.io). We will review your query and reply to you.

If you are not satisfied with our response or if you believe that we are processing your data incorrectly or unlawfully, you can file a complaint with the competent supervisory authority, which is the Personal Data Protection Office of the Czech Republic. More information can be found at [www.uoou.cz](http://www.uoou.cz).