

Form of the ethical alert right

The Safetypay Group guarantees to each employee, in a situation contrary to the values and ethical commitments of the Group, the right to alert, with total confidentiality and without risk of reprisals, to their Senior Hearing Officer or to a dedicated partner in Safetypay, in this case, the Head of the Compliance Department. Thus, any employee can send an ethical alert through the following form. (It is important to carefully read the detailed instructions of the ethical alert procedure before declaring an alert).

Surname:	Name:
Phone Number:	E-mail address:
Date:	Relation with the Entity:

I declare that my communication complies with the ethical alert right (Check the box that your communication fits within this framework).

Please, tell us where the incident occurred: (please specify the entity, department, country, city, etc.)

Place: Date and moment: Other (any significant element):

Please describe the facts that you have considered unethical, inappropriate or that may be harmful to SAFETYPAY, one of its employees or one of the interested parties (suppliers, customers, consultants, etc.).
(Please attach any document that can help study your alert (or specify your location) and identify the people or organizations involved in the incident by name):

--

Please specify, if appropriate, the names of the persons or departments with whom you have already spoken about the incident:

--

Do you think anyone has tried to cover up the incident? (If so, please identify the person (s) by name (s) and explain what steps have been taken to cover up the incident):

--

If we have more questions, we will contact you through the contact information you have provided at the beginning of the form (you have the possibility of providing us with other non-professional contact information):

By phone YES NO
 By e-mail YES NO

Firm: (in case of sending by mail)	
---	--

You should send this form to:

Safetypay or to the email: canaldenuncias@safetypay.com
Hermosilla 64 – 4ºD
28001 Madrid Signed: Mr/Ms _____

INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA PROVIDED IN THE FORM

RESPONSIBLE AND PURPOSE OF THE TRANSFER

*In compliance with the new Regulation (EU) 2016/679 of April 27, 2016 regarding the Protection of Personal Data of natural persons (hereinafter "GDPR"), we inform you that the personal data that you could provide will be processed by SAFETYPAY (hereinafter "**SAFETYPAY**"), as Responsible for the Treatment, with the purpose of handling complaints related to possible irregularities, breaches or behaviors contrary to the ethics, legality or corporate rules of SAFETYPAY. This treatment may have consequences for the defendant since, in the case of criminal acts, SAFETYPAY may initiate legal action against him.*

LEGITIMATION AND CONSERVATION TERMS

The legitimacy of the processing of your data is based on the legitimate interest of the Entity in investigating possible irregularities, breaches or behaviors contrary to the ethics, legality or corporate norms of SAFETYPAY. In the same way, SAFETYPAY will ensure respect for the principle of proportionality, so that the complaints refer only to cases that have an effective implication in the relationship between SAFETYPAY and the denounced, specifying the actions subject to complaint, legal basis or internal codes unfulfilled

SAFETYPAY guarantees the accuracy, confidentiality, minimization of data and limitation of the period of conservation of the information collected, in accordance with Article 5 of the GDPR. As well as the implementation of technical and organizational security measures depending on the risk involved in the treatment, in accordance with Article 32 of the GDPR.

DATA RECIPIENTS

Likewise, we inform you that your data may be communicated to potential recipients such as National Official Authorities or Organizations, Courts and Tribunals, and State Security Forces and Bodies. Such communications could involve the international transfer of data to countries located outside the European Economic Area, some of which have not been declared as countries with a level of data protection equivalent to the European by the European Commission.

In the hypothetical case that the data contained in the complaint systems were to be transmitted to a third company that investigates the denounced fact, the interested parties will be informed and a contract for the treatment will be established as provided in the Regulation with the appropriate safety measures depending on the risk involved in said treatment.

LEGITIMATION AND CONSERVATION TERMS

The legitimacy of the processing of your data is based on the legitimate interest of the Entity in investigating possible irregularities, breaches or behaviors contrary to the ethics, legality or corporate rules of SAFETYPAY. The data provided may be kept for the time necessary to investigate the reported facts.

RIGHTS

You have the right to access your data, rectify, delete or carry it, limit or oppose its treatment in certain cases, as well as revoke the consents given in your case, by sending a communication or by writing to protecciondatos@safetypay.com, SAFETYPAY to C / Hermosilla 64, 28001 Madrid, including your name, surname, copy of your ID, an address for notifications and the right you wish to exercise. You can also claim before the Spanish Agency for Data Protection (AEPD) through www.aepd.es, especially when you have not obtained satisfaction in the exercise of your rights.