

Small World Financial Services- Whistleblowing Channel

On 7 October 2019, the European Parliament and the Council of the European Union adopted the EU Whistleblower Protection Directive with the aim of protecting employees who report an alleged crime, offence or fraud, in a safe and confidential manner.

To this end, Small World has created a secured reporting channel so that anyone can report, even anonymously, relevant information about a crime if they have **reasonable grounds** to believe, in light of the circumstances and the information available to them at the time of the report, that the facts reported are true, without any retaliation for doing so.

What sort of issues can be reported via this channel?

Serious breaches. This page may be used to submit information on any detected irregularities or report illegal activities or any actions or omissions that violate the entity's internal policies.

How do communications take place?

Communications made through this channel will always be treated confidentially, indicating only the name and contact information. Communications through this channel may also be made 100% anonymously, if desired. Small World generates a report for each communication.

Communications through this whistleblowing channel can be made anonymously if you prefer not to disclose your identity to anyone in the process.

Select how you would like to report from the following link:

<https://whistleblowersoftware.com/secure/smallworldcanaldedenuncias>

The channel manager shall acknowledge receipt of a report within 7 days of receipt. A response shall be given to the report no later than **3 months (90 days) from the date of the acknowledgement of receipt**

What sort of issues cannot be reported via this channel?

Communications concerning human resource management. Human resources issues (e.g. poor work performance, absence from work, etc.) should not be reported through this system. Rather, they should be discussed with the line manager.

This channel was set up for reporting workplace harassment (physical, psychological, cyber and sexual harassment).

How can I find out the status of my communication?

The channel assigns each communication a unique password that only the whistleblower. This password will be used to check the status of the communication.

This page lets the whistleblower monitor the status of the report that Small World opened in response to his/her communication, provided the password has been copied.

In addition, **monitoring your reports can be relevant for a number of reasons:**

- 1) Doing so lets you view the status of the report to check whether measures are being taken.
- 2) You can submit additional information to the report.
- 3) You will also be able to reply to system administrators, if asked to provide additional information to help them solve an issue.

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What are my rights and duties as a whistleblower?

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Whistleblowers have the following rights, which Small World legally acknowledges and observes:

- Right to be informed about the existence of the channel
- Right to confidentiality
- Right to [anonymity of the whistleblower if the communication is made anonymously.](#)

- Right to non-retaliation by Small World.
- Right to be informed of the resolution or closure of the communication.
- Your data protection rights, i.e. the right to access, rectification, opposition, erasure ("right to be forgotten") and restriction of processing.

Whistleblower must nevertheless comply with the following duties or obligations:

- Act in good faith
- Provide data and documents related to the alleged facts
- Duty to safeguard confidentiality

What are my rights as a reported person?

Similarly, as a reported person, you have the right to:

- Be notified as soon as possible that you are under investigation because of allegations against you. This notification must contain information on the management body handling the allegations, and the reported party's corresponding rights.
- Allegation handling procedure.
- Right to access data on file, with the exception of the identity of the whistleblower and anyone else concerned by the file.
- Right to rectify any incorrect or incomplete personal data.
- Right to be informed of the resolution or closure of the communication.

How will my personal data as a whistleblower be processed?

The personal data of the whistleblower will be processed by the SWFSG entity to which the allegation is addressed.

SWFSG undertakes to rigorously safeguard the data privacy, security and retention, as further specified in our Compliance policies and procedures. These rules will also apply in respect of all personal data relating to allegations made in accordance with this Policy.

SWFSG will keep a record of all allegations received. These records and the personal data contained therein shall be kept confidential. Records shall be kept for no longer than is necessary and in any event for as long as is necessary to comply with any applicable legal requirements at all times.

In particular, SWFSG will retain the whistleblower's personal data for the time necessary to decide whether to initiate an investigation into the allegations or conduct and, once decided, the data will be deleted from the Whistleblower Channel but may also be processed outside the system to investigate the allegations for the time necessary to reach a decision. Once the investigation of the allegation has been completed and any appropriate measures have been taken, if necessary, the data of those allegations that have been followed up will be duly blocked to comply with the corresponding legal obligations in each case.

In any case, personal data will be deleted from the Whistleblower Channel after three (3) months have elapsed since they were entered, unless they must be retained for a further period of time to comply with legal and corporate obligations or to provide evidence that the crime prevention model works properly. They may, however, continue to be processed outside the Whistleblower Channel if the investigation thereof has not concluded, for as long as necessary until its conclusion.

Should a decision be taken not to pursue the allegation filed, the information may be rendered anonymous and retained.

What personal data does SWFSG collect?

In handling allegations made in accordance with this Policy, SWFSG collects the following personal data and information provided when making an allegation and throughout the investigation of the allegation:

- Whistleblower name and contact particulars (except anonymous allegations) and whether the whistleblower is an SWFSG employee
- Name and other personal particulars of parties named in the allegation (alleged offender, possible witnesses and others), when such information is provided (i.e. job description, contact details and involvement or role with respect to the allegations);
- Description of the alleged breach and circumstances regarding the incident or incidents.
- Any other documentation that the whistleblower wishes to attach to the allegation that may contain personal data.

For what purpose does SWFSG process personal data?

SWFSG only processes personal data that are strictly necessary for handling, processing and investigating allegations of wrongdoing or acts contrary to the ethics, legality or corporate rules of the SWFSG Group. This includes the necessary steps to investigate the allegations, including, where appropriate, the necessary disciplinary or legal action.

Personal data will only be used for the aforementioned purpose and never for any other purpose.

What is the legal basis for the processing?

Personal data processing within the framework of the internal communications channel is contemplated in Articles 6.1.c) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016; 8 of Spanish Law 3/2018 of 5 December; and 11 of Spanish Law 7/2021 of 26 May, which stipulates a statutory internal reporting system.

If it is not compulsory, the processing shall be presumed to be covered by Article 6(1)(e) of the EU Regulation cited above.

Personal data processing in the cases of external communication channels shall be considered lawful as provided for under Articles 6.1.c) of Regulation (EU) 2016/679; 8 of Spanish Law 3/2018 of 5 December; and 11 of Spanish Law 7/2021 of 26 May.

Who are the recipients of the personal data?

Personal data collected in the context of allegations filed through alternative whistleblowing channels may be processed or disclosed to the following parties where necessary:

- The platform service provider that manages the alternative whistleblowing channels on a daily basis.

- Members of the SWFSG Compliance Committee.
- Authorised agents of SWFSG, provided that the nature or extent of the allegations requires their involvement.
- External investigator, consultant or advisor who has been engaged to assist SWFSG in the assessment of the notification or investigation of the matter, or to advise SWFSG therein.
- Police and/or other regulatory or law enforcement authorities.

What are the whistleblower's data protection rights?

As an informer, the whistleblower making the allegation may exercise, at any time and under the terms provided for by the pertinent legislation and regulations in force, the right to access the personal data concerning him/her as data subject. If this data subject believes that the data are incorrect or incomplete, he or she may request their rectification in accordance with the applicable legislation.

The data subject may thus request erasure of the data when they are no longer needed, except in cases where there is a legal obligation to retain them. The data subject may also request the portability or restriction of processing, or object to the processing of, his or her data, and shall have the right to withdraw his or her consent in this regard. When filing an allegation, whistleblowers shall be informed how to exercise all these rights.

Whistleblowers may also lodge a complaint with the competent data protection authority whenever deeming it appropriate to do so.

Where can I get more information on personal data processing concerning me?

You can get further information about the processing of your personal data and contact particulars of the possible entity agent assigned for this purpose, Data Protection Officer or other privacy officer by sending an e-mail to dpo@smallworldfs.com.