

GDPR Information Clause for Whistleblowers

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter referred to as “GDPR”), please be advised as follows:

1. Data Controller

The controller of your personal data is Gobarto SA, with its registered office at Wspólna 70, 00-687 Warsaw, Poland (hereinafter referred to as the “Controller”).

2. Contact Information

For all matters related to the protection of personal data, you may contact us via email at dane.osobowe@gobarto.pl, through the dedicated whistleblower platform provided on our website at www.gobarto.pl (www.sygnaapp.pl/system-zgloszen-wewnetrznych/gobarto/), or in writing at the Controller’s registered office address indicated in Section 1.

3. Purposes and Legal Basis for Processing Personal Data

Your personal data will be processed on the following legal grounds:

- a) Article 6(1)(c) GDPR in conjunction with the provisions of the Act of 14 June 2024 on the Protection of Whistleblowers (hereinafter the “Act”), for the purpose of fulfilling the Controller’s legal obligations related to reported breaches of the law;
- b) Article 9(2)(g) GDPR in conjunction with the provisions of the Act, where the report contains special categories of personal data;
- c) Article 6(1)(a) GDPR (i.e., based on your voluntarily given consent), if you choose not to remain anonymous;
- d) Article 6(1)(f) GDPR (the Controller’s legitimate interests) for establishing, securing, pursuing, or defending against potential claims.

4. Rights of the Data Subject

As a data subject, you have the following rights regarding your personal data:

Gobarto SA
Wspólna 70
00-687 Warsaw
Poland
NIP: 699 17 81 489
REGON: 411141076
BDO: 000014202

Distribution Division:
Wspólna 70
00-687 Warsaw
Poland
Tel. (+48) 22 31 99 300
E-mail: biuro@gobarto.pl

Production Division:
Grąbkowo Processing Facility
Grąbkowo 73
63-930 Jutrosin
Poland
Tel. (+48) 65 547 70 00
E-mail: gobarto@gobarto.pl

Sales Department:
Tel. (+48) 65 547 70 40
E-mail: handel@gobarto.pl

Procurement Department:
Tel. (+48) 65 547 71 90
E-mail: skup@gobarto.pl

- 1) Right to access your personal data, including confirmation of whether the Controller is processing it, details about such processing, and the right to receive a copy of your data (the first copy is provided free of charge);
- 2) Right to rectification or completion of inaccurate or incomplete personal data;
- 3) Right to request erasure of personal data;
- 4) Right to request restriction of processing of personal data;
- 5) Right to object to the processing of personal data;
- 6) Right to data portability, i.e., to receive the data provided to the Controller and transmit it to another controller, where technically feasible;
- 7) Right to object at any time to the processing of personal data;
- 8) Right to withdraw consent at any time (without affecting the lawfulness of processing carried out before the withdrawal);
- 9) Right to lodge a complaint with the Polish supervisory authority, i.e., the President of the Personal Data Protection Office (UODO), by writing to Urząd Ochrony Danych Osobowych, Stawki 2, 00-193 Warsaw, Poland, or electronically via the UODO Electronic Inbox, following the instructions available at: www.uodo.gov.pl.

5. Data Retention Period

Your personal data will be processed and stored for a period of 3 years following the end of the calendar year in which the follow-up actions were completed or the proceedings initiated by those actions were concluded. Personal data unrelated to the reported matter is not collected. However, if accidentally obtained, it will be deleted within 14 days of determining its irrelevance to the case.

6. Recipients of Personal Data

The Controller ensures the confidentiality of your personal data in connection with the submitted report. Therefore, your personal data may only be disclosed to entities legally authorized to process it, particularly public authorities, as well as to entities supporting the Controller in fulfilling its rights and obligations and providing services. These include providers of legal, archival, postal, courier, and advisory services, as well as companies offering IT solutions, technical assistance, and support for IT systems in which your data is processed.

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7. Transfer of Personal Data to Third Countries

The Controller does not intend to transfer personal data outside the European Economic Area (EEA, comprising EU member states, Norway, Iceland, and Liechtenstein). However, if such a transfer becomes necessary, it will be carried out in compliance with GDPR safeguards, ensuring an appropriate level of data protection.

8. Voluntary Provision of Data

Providing personal data is voluntary. If you choose not to provide your personal data, your report will be treated as anonymous.

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