



PROCESSING OF PERSONAL DATA

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LEGAL REGIME

The processing of personal data in the internal information system must be carried out in accordance with the applicable regulatory provisions, specifically 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. Organic Law 3/2018, of 5 December, on the protection of personal data and guarantee of digital rights, and also those of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory breaches and the fight against corruption.

DUTY OF INFORMATION

When their personal data are obtained directly from the interested parties, they will be provided with the information referred to in Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, and 11 of Organic Law 3/2018, of 5 December.

Informants and those who make a public disclosure will also be expressly informed that their identity will be reserved in any case, and that it will not be communicated to the persons to whom the facts related refer or to third parties.

The person to whom the facts related refer shall in no case be informed of the identity of the informant or of the person who has carried out the public disclosure.

Employees and third parties must be informed about the processing of personal data within the framework of the Information Systems.

ACCESS TO PERSONAL DATA

Access to the personal data contained in the internal information system will be limited, within the scope of its powers and functions, exclusively to:

- a) The person responsible for the system and whoever manages it directly.
- b) The head of human resources or the competent body, only when disciplinary measures could be taken against an employee.



- c) The person in charge of the legal services of the entity or body, if appropriate the adoption of legal measures in relation to the facts reported in the communication.
- d) The data processors that may be designated.
- e) The data protection officer.

The processing of the data by other persons, or even its communication to third parties, will be lawful when it is necessary for the adoption of corrective measures in the entity or the processing of the sanctioning or criminal proceedings that, where appropriate, may be appropriate.

When requesting the information or documentation necessary to carry out the proper monitoring of the communication, the channel manager must warn the units to which the request is addressed that they must not provide personal data that has not been expressly requested.

DELETION OF PERSONAL DATA

In the procedure for monitoring the communication, personal data must not be collected whose relevance is not manifest because it processes that specific communication; If they are collected by accident, they must be disposed of without undue delay and/or the documentation received at the issuing unit must be returned.

Likewise, all personal data that may have been communicated and that refer to conduct that is not included in the scope of application of the law will be deleted.

If it is proven that the information provided or part of it is not true, it must be immediately deleted from the moment that this circumstance is known, unless such lack of veracity may constitute a criminal offence, in which case the information will be kept for the necessary time during which the judicial proceedings are being conducted.

In any case, if three months have elapsed since receipt of the communication without any investigation proceedings having been initiated, it must be deleted.

If the information received contains personal data included within the special categories of data, it will be immediately deleted, without registering and processing them.

RETENTION OF PERSONAL DATA

The data that are subject to processing may be kept in the information system only for the time necessary to decide on the admissibility of initiating an investigation into the facts reported. In no case may the data be kept for a period of more than ten years

Communications that have not been processed may only be recorded in anonymised form, without the obligation to block provided for in Article 32 of Organic Law 3/2018, of 5 December, being applicable.

EXERCISE OF RIGHTS

Data subjects may exercise the rights referred to in Articles 15 to 22 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016. 4. In the event that the person to whom the facts related in the communication refer or to whom the public disclosure refers exercises the right to object, it will be presumed that, unless proven otherwise, there are compelling legitimate reasons that legitimise the processing of their personal data.



For more information on the processing of personal data, please consult the Privacy Policy of **NOEL Alimentaria S.A.U.:**

[Privacy Policy - NOEL](#)