

## **INFORMATION CLAUSE FOR WHISTLEBLOWERS**

### **For the person who directly provided the data to Sano**

1. The Controller is SANO - CENTRE FOR COMPUTATIONAL PERSONALISED MEDICINE – INTERNATIONAL RESEARCH FOUNDATION with its registered office at 36 Czarnowiejska Street in Krakow (30-072), entered into the Register of Associations, Other Social and Professional Organizations, Foundations and Independent Public Health Care Institutions of the National Court Register, kept by the District Court for Krakow-Śródmieście (Krakow Śródmieście Krakowa, XI Commercial Division under the number KRS 0000797490, NIP 677-244-64-72, REGON, 384298430;
2. In order to exercise your rights under the GDPR, please contact the Controller using the contact details provided or the appointed Data Protection Officer at the e-mail address [iod@sanoscience.org](mailto:iod@sanoscience.org);
3. The data will be processed for the purpose of:
  - a) handling reports of violations of the law, i.e. in particular analysis of the received report; keeping a register of reports of violations; preparing reports summarizing the activities carried out and conducting statistical analyses, archiving documents. The above is to ensure the legal and financial security of the Administrator, including the prevention of fraud and abuse. The data will be processed on the basis of Article 6(1)(c) of the GDPR (i.e. the need to comply with a legal obligation to which the Controller is subject) in connection with the Act of 14 June 2024 on the protection of whistleblowers.
  - b) Investigation, defence against claims, as well as storage of documents for evidence purposes to secure information in the event of a legal need to prove facts, which is the legitimate interest of the controller – pursuant to Article 6(1)(f) of the GDPR
4. The Controller will process personal data for the period necessary to register and handle the report, then store it for the purpose of documenting the activities performed and in the event of disclosure of new circumstances in the case of the report, the need to make the documentation available to law enforcement authorities, control institutions, judicial authorities and in the event of claims for the period necessary to resolve them. As a rule, personal data will be stored for the period specified by law in the field of archiving documents and for the period of limitation of claims;
5. Providing personal data is a condition for receiving feedback, however, it is also possible to report anonymously;
6. The recipients of personal data may be entities involved in projects carried out by the Administrator or public authorities and entities performing public tasks or acting on behalf of public authorities, to the extent and for the purposes resulting from the provisions of law, as well as entities providing services necessary to perform the tasks of the Administrator. Data may also be transferred to IT partners and entities providing technical or organizational support. The whistleblower's personal data,

which allow their identity to be determined, are not disclosed to unauthorised persons, unless with the whistleblower's express consent.

7. Where disclosure is a necessary and proportionate legal obligation in connection with investigations by public authorities or preparatory or judicial proceedings by courts, including to guarantee the rights of defence of the person concerned. If your data is to be disclosed, then the competent public authority or competent court will notify the whistleblower about it, sending an explanation in paper or electronic form of the reasons for the disclosure of their personal data, unless such notification jeopardises the investigation or preparatory or court proceedings.
8. You have the right, in relation to Sano, to request access to your personal data, as well as to request their rectification, deletion or restriction of processing or portability. In order to exercise these rights, please contact us at the e-mail address provided in paragraph 2 above;
9. you have the right to lodge a complaint with the President of the Office for Personal Data Protection, as well as in particular in the Member State of your habitual residence, place of work or place of committing the alleged infringement.

#### **Information clause**

##### **For individuals whose data has been provided to Sano by third parties (not directly by those third parties)**

1. The administrator of personal data is SANO - CENTRE FOR COMPUTATIONAL PERSONALISED MEDICINE – INTERNATIONAL RESEARCH FOUNDATION with its registered office at 36 Czarnowiejska Street in Krakow (30-072), entered into the Register of Associations, Other Social and Professional Organizations, Foundations and Independent Public Health Care Institutions of the National Court Register, kept by the District Court for Krakow-Śródmieście (Krakow Śródmieście Krakowa, XI Commercial Division under the number KRS 0000797490, NIP 677-244-64-72, REGON, 384298430;
2. In order to exercise your rights under the GDPR, please contact the Controller using the contact details provided or the appointed Data Protection Officer at the e-mail address [iod@sanoscience.org](mailto:iod@sanoscience.org);
3. The data will be processed for the purpose of:
  - a) handling reports of violations of the law, i.e. in particular analysis of the received report; keeping a register of reports of violations; preparing reports summarizing the activities carried out and conducting statistical analyses, archiving documents. The above is to ensure the legal and financial security of the Administrator, including the prevention of fraud and abuse. The data will be processed on the basis of Article 6(1)(c) of the GDPR (i.e. the need to comply with a legal obligation to which the Controller is subject) in connection with the Act of 14 June 2024 on the protection of whistleblowers.

b) Investigation, defence against claims, as well as storage of documents for evidence purposes to secure information in the event of a legal need to prove facts, which is the legitimate interest of the controller – pursuant to Article 6(1)(f) of the GDPR

4. The Controller will process personal data for the period necessary to register and handle the report, then store it for the purpose of documenting the activities performed and in the event of disclosure of new circumstances in the case of the report, the need to make the documentation available to law enforcement authorities, control institutions, judicial authorities and in the event of claims for the period necessary to resolve them. As a rule, personal data will be stored for the period specified by law in the field of archiving documents and for the period of limitation of claims;
5. The recipients of personal data may be entities involved in projects carried out by the Administrator or public authorities and entities performing public tasks or acting on behalf of public authorities, to the extent and for the purposes resulting from the provisions of law, as well as entities providing services necessary to perform the tasks of the Administrator. Data may also be transferred to IT partners and entities providing technical or organizational support;
6. You have the right, in relation to Sano, to request access to your personal data, as well as to request their rectification, deletion or restriction of processing or portability. In order to exercise these rights, please contact us at the e-mail address provided in paragraph 2 above;
7. you have the right to lodge a complaint with the President of the Office for Personal Data Protection, as well as in particular in the Member State of your habitual residence, place of work or place of committing the alleged infringement.
8. Due to Article 8(5) of the Whistleblower Protection Act of 14 June 2024), as a rule, the source of personal data (whistleblower data) is not disclosed, unless the whistleblower does not meet the conditions set out in Article 6 of the said Act or has expressly consented to such transfer.