

TERMS OF USE

1.- Introduction The website «www.ariti.gr» (hereinafter «site») is operated by the Company «ARITI S.A.» located in Acharnes, Attica (52 Tatoiou Avenue), with Tax Registration Number 094251753 (hereinafter referred to as “the Company”). By using this site, you agree to comply with, and to be bound by, these Terms of Use and **Company’s Privacy Policy**; similarly posted on the site. Please review these Terms of Use and our Privacy Policy carefully in view of the protection of your interests. If you do not agree with them, do not use this website.

2.- The conditions of use The Company may modify and update the Terms of Use from time to time for compliance with regulatory changes or to meet its operating needs and legal obligations. The User of the site should check these Terms of Use periodically for changes. The continued use of the site by the User, following the posting of changes will mean that the User accept and agree to the changes. The Company is committed to the accuracy, truth and completeness of the information provided on the site, in terms of the identity of the Company and the information provided through the site. The company is not responsible and is not bound by data entries made by mistake during the common experience and is entitled to correct them whenever it realizes their existence. The Company is not responsible for any kind of damage suffered by the User of the pages, services, options and contents of the site, which he proceeds on his own initiative and with the knowledge of the Terms of Use. The User of the site must take all appropriate security measures (for example virus protection programs, etc.) before any “loading” from the site. The User is charged with any repair cost and the Company is not liable for any liability or charge. The User is responsible for accessing the services of the site and the relevant access may require the payment of fees to third parties (for example internet service provider, charge for time spent on the internet). The User is solely responsible for paying the relevant fees and for his personal equipment.

3.- Intellectual Property Rights Any texts, images, graphics, sound/video/animation files and their arrangement on the site are protected by the intellectual property legislation applicable in Greece. Redistribution, modification, reproduction, republication or retransmission of any information from this site using any electronic, printed or other medium is strictly prohibited. The site may contain images that are the intellectual property of third parties.

4.- User Responsibility The User is obliged to comply with all relevant Greek, European and international laws and regulations, including indicative and not restrictive laws relating to the protection of intellectual property, protection of personal data, protection of competition, etc. In addition, the User must use this site in accordance with good manners and these Terms of Use. The User of this site undertakes not to make use the site for illegal or harmful purposes; not to prevent access to the site nor to disrupt or modify it, nor to render it less efficient or to cause damages to it (site), to the Company or third parties. Furthermore, the User shall not make use of the site in order to transmit or distribute computer viruses or harmful, insulting or illegal information.

5.- Linked Sites This site may be linked to other websites which are not under the control of, and are not maintained by the Company. The Company is not responsible for the content of those sites and the link does not imply that the Company agrees with its content. The Company is providing these links to you only as a convenience and at your own risk, and the inclusion of any link to such sites does not imply endorsement by the Company of those sites, nor does it imply any partnership or cooperation whatsoever between the Company and the owners or operators of such linked sites.

6.- Other Terms If any provision of these Terms of Use (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision shall, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of these Terms of Use shall not be affected. These Terms of Use (and their amendments) and any dispute or claim arising out of or in connection with them shall be governed by and construed in accordance with the law of Greece. The Courts of Greece and particular the Courts of Athens shall have exclusive jurisdiction to settle any dispute or claim that arises out of or in connection with these Terms.- *We reserve the right, in our sole direction, to modify or update this at any time.*

Last update: February 2021

Privacy Policy

PRIVACY POLICY OF ARITI S.A.

1.- Introduction: Protecting the data is of primary concern to ARITI. In order to success the above, ARITI applies all modern and appropriate for the purpose of processing technical and organizational measures, the response of which is checked at regular intervals. This Policy informs data subjects about the data that ARITI processes due to its business activity (hardcopy and online) in accordance with Regulation EU 2016/679 (hereinafter Regulation). This Policy describes how ARITI collects and uses your personal data (including personal data or personal information that our Company may collect during the use / visit of our website “www.ariti.gr”), how ARITI protects your personal

data, how long ARITI processes your data and your rights.

2.- Definitions **PERSONAL DATA** means any information relating to an identified or identifiable natural person ('data subject'): an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number. **SPECIAL CATEGORIES OF PERSONAL DATA** (sensitive data) means the data referring to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or data concerning a natural person's sex life or sexual orientation. **DATA CONCERNING HEALTH** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status. **PROCESSING** means collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination. **CONTROLLER** means the natural or legal person, public authority, agency or other body which determines the purposes and means of the processing of personal data. **PROCESSOR** means the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. **RECIPIENT** means the natural or legal person, public authority, agency or another body, to which the personal data are disclosed. **SUPERVISORY AUTHORITY** means an independent public authority which is established by each Member State. In Greece is the Hellenic Data Protection Authority (HDPA). **CONSENT OF THE DATA SUBJECT** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

3.- Principles relating to processing of personal data According to the Regulation, every company shall :collect the personal data lawfulness and fairness, keep only the needed data,keep data secure, use appropriate technical and organizational measures in order to ensure appropriate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage and be able to demonstrate its compliance with Regulation.

4.- The purpose of the Policy The purpose of this Policy is to provide you with information concerning the collection, procession of personal data; which personal data we collect, for how long and for what purpose. This policy also applies to the visitors / users of our website («www.ariti.gr»). With regard to the staff of our company (candidate, staff member and former employees), ARITI applies a separate policy (PRIVACY POLICY EMPLOYEES' DATA).

5.- PRIVACY POLICY A) The legal basis for the processing : – the compliance of our company with a legal obligation, in particular pharmaceutical legislation and legislation on medical devices, – the fulfilment of our contractual obligations, – the proper operation of our company, – the satisfaction of requests for information and communication of data subjects. – securing our staff, facilities and equipment and – the fulfillment of our contractual obligations towards third parties, such as manufacturers of products. B) The Personal data that we collect and how we process them

The Personal data that ARITI processes: healthcare professionals : Name,Surname, SSN (Social Security number) , Specialization,Working actor, Professional title/ Academic degree, contact address, E-mail, Telephone number, Mobile phone, VAT, PATIENTS : Name, Surname, Telephone number,VAT, SSN (Social Security number), insurance fund, contact address, Mobile phone suppliers or EXTERNALS: Name & Surname or name of the company, contact address, Telephone number, VAT, FAX, E-mail, Conduct persons, VISITORS / USERS OF «www.ariti.gr» : During the visit to the Company's website, the technical necessary information is collected for the realization of the connection to the website or for the provision of the cookie service, for the installation of which the consent of the subject is not required (see COOKIES POLICY). Fullname, E-mail, Telephone number (optionally), Organization (optionally), C) The purpose of processing – Grant of Health Professionals participation at EOF conferences., – Information, promotion and commercial communication of our products and services. – Information of Health Professionals for scientific events, conferences or seminars of EOF competence. – Execution of an order or contract. – Fulfillment of our legal obligations towards the insurance funds, Clinical or Public Hospital. ,- Receiving directly from the EOPPY or the insurance funds the price of the materials sold. ,- Our compliance with pharmaceutical legislation and legislation on medical devices (eg adverse reactions). ,- Compliance with manufacturer's requirements. ,- Fulfillment of our obligations., – Fulfillment of our goals. – Reply to Supplier, Customer (including Patient) and Partner. – Reply to request for information made by users / visitors of the website "www.ariti.gr". In all cases, except in cases where public services disclose data to us, personal data are submitted to our Company voluntarily by the subjects themselves or through their representatives. D) Period of time for which your data is stored

Your data will be only stored for as long as necessary to fulfill the respective purpose for which we collect them in accordance with Regulation. E) How ARITI processes your personal data ARITI collects only the necessary personal data, as appropriate. Furthermore, the processing of the data is done both on printed and electronic media and is recorded in the Company's corporate system in accordance with applicable law – including provisions on data security and confidentiality and in accordance with the principles of fairness and lawful processing. F) How ARITI discloses your personal data Your personal data are processed by authorised officials. ARITI further may share your data with other partners, as law firm, insurance company, holder of authorization, organizer

of Auditors, or public service and information system, as EOF, EOPYY, banks and insurance funds, as part of our compliance with external and internal regulations or where otherwise required by law. In the context of the Company's business activity, personal data may be disclosed to suppliers or externals of the Company. However, in this case, legal or natural person will process such data only for the purpose of providing the services to the Company and not for their own benefit, acting as processors and having committed themselves with a Statement of Confidentiality. Exceptionally, personal data may be disclosed to third parties (police and prosecuting authorities), only if there is a statutory obligation or by a judicial authority.

G) Transfers of personal data to third countries or international organisations ARITI doesn't transfer personal data to third countries or international organisations. In any case of transmission outside of the European Economic Area, ARITI will obey the Regulation.

6.- Rights of the data subject

The data subject has the right to obtain from ARITI confirmation as to whether or not personal data concerning him or her are being processed by this company and have access to his or her personal data. The data subject may at any time contact the Company, and in particular the Data Protection Officer (telephone number: 210-3645691 & e-mail: dpo@samartzislaw.gr), to exercise the rights provided for in the General Data Protection Regulation (Articles 15-22), such as access to personal data (in order to know the purposes of the processing and the recipients of the data), the verification of the content of the data, its origin, accuracy and location, the obtaining of a copy of your data, updating, modification of the data, in the cases stipulated by the law, the request for definition of the data, the request for deletion of data etc. These rights are, in principle, exercised at no cost to the underlying. In addition, if you (the data subject) have given explicit consent to the processing of your personal data for one or more specified purposes, you may withdraw your consent at any time by a simple revocation statement (contact phone number: 210-3645691, e-mail: dpo@samartzislaw.gr, address: 52, Tatoiou Avenue, 136 77 Acharnes). Finally, at any time you have the right to submit directly a complaint to the Hellenic Data Protection Authority (HDPa) (www.dpa.gr). *We reserve the right, in our sole direction, to modify or update this Policy at any time. Last update: February 2021*

Cookies Policy

1.- Introduction

The security and confidentiality of information and data are a high priority for the company "ARITI S.A." (hereinafter referred to as "the Company") To achieve the above, the Company applies all the appropriate technical and organizational measures for processing purposes, the response of which is controlled at regular intervals. This POLICY explains what cookies are and how we use them on this website, the type of cookies the Company uses each time you visit our sites, the information the Company collects using the cookies, and how this information is used.

The Company may amend this Policy.

2.- What cookies are? Cookies are small text files which are stored on the User's browser when visiting a website. The information stored in the User's computer may contain information such as what pages the User visited, the date and time of the visit, and a random and unique User ID. With this use, the Site is able to store useful information of the User for his browsing on the site, as well as reading this information in order to provide the User with a unified browsing experience. Generally, the use of cookies requires your prior consent, with the exception of technical cookies, which are necessary for the proper operation and browsing of a site. Without them, users may not be able to properly view pages or use certain features.

3.- What cookies do we use on our Site? At this site our Company uses only technical cookies, which are technically necessary to make the connection to the site. Otherwise, our Company uses only the necessary cookies, which are essential for the proper functioning of our Website, allowing you to browse and use their features, such as access to secure sites. These cookies do not recognize your personal identity. Without these cookies, we cannot provide effective operation of our Sites. If you do not accept these cookies, the performance and functionality of our site may be affected and your access to its content may be restricted.

4.- How to delete COOKIES To find out more about the types of cookies and how you can manage them, please visit: <http://www.allaboutcookies.org>. If you decline to use cookies, some features of this site may not work properly.

5.- Rights Every data subject has the right to know and have access to his personal data held by the Company in accordance with this Policy, to verify the accuracy of the personal data provided to the Company and to update his personal information data. The data subject may at any time contact the Company and in particular the Data Protection Officer (dpo@samartzislaw.gr) to exercise his rights under the General Data Protection Regulation (Articles 15-22), such as, inter alia, access to his data (in order to know what his data is and why it is processed by the Company and his recipients), verification of the content of his data, his origin, accuracy and location, acquisition copy of his data, the request to supplement, update, modify his data, as required by law, a request to limit his data processing, request to delete his data, etc. These rights are in principle exercised at no cost to the individual. Finally, data subject may at any time directly inform the Personal Data Protection Authority if it deems inappropriate the

Company's use of their data (www.dpa.gr). The Company may modify and update the Cookies policy from time to time for compliance with regulatory changes or to meet its operating needs and legal obligations. *We reserve the right, in our sole direction, to modify or update this Policy at any time. Last update: February 2021.*

CCTV NOTICE

1.- Controller: ARITI SA, 52 Tatoiou Avenue, 13677, Acharnes – Attiki, Greece
Phone: +30 210 8002650

DPO: Evaggelia Rentoumi (mail: dpo@samartzislaw.gr & phone: 210-3645691)

2.- The purpose of the processing and the legal basis:

We have placed CCTV cameras up at some of our venues to monitor specific areas for security and safety purposes of persons and property. The processing is necessary for purposes of legitimate interests that we seek as the Controller (article 6 §. 1. f GDPR).

3.- Legitimate interest

Our legitimate interest is to control the access to the building and to ensure the security of the building, the safety of our staff and visitors, as well as property and information located or stored on the premises. We collect just images caught on camera, and no voice is recorded. The CCTV system is not used for any other purpose, such as to monitor the work of employees or their attendance. The CCTV system covers only areas where we have assessed that there is an increased likelihood of committing illegal acts, like area of entry and exit points of the building, entry points inside the building, delivery, garage and outer area of the building.

4.- Recipients of the data

The images can be accessed by our security staff members and by the contracted security company MEGA GROUP SECURITY SA.

In certain circumstances we may be required to disclose CCTV images to certain bodies of authority, such as the police and emergency services.

5.- Retention period

We will keep your personal data for fifteen (15) calendar days after your visit to our premises. After that period any CCTV recorded footage is automatically deleted. In case we find an incident during this period, we isolate part of the video and keep it for another (1) month, in order to investigate the incident and initiate legal proceedings to defend our legal interests, while if the incident concerns thirdly we will keep the video for up to three (3) more months.

6.- Rights of the data subject

As a data subject, you have the right of access (in order to know the purposes of the processing and the recipients of the data), the right to restrict processing, the right to object, the right to erasure. You have the right to exercise your rights by sending an email request to dpo@samartzislaw.gr or by sending letter to our postal address.

To consider a request related to your image, you should tell us about when you were within the range of our cameras and give us a picture of you, in order to locate your data and hide the data of third parties pictured. Alternatively, we give you the opportunity to come to our facilities to show you the images in which you appear. We also note that the exercise of the right of objection or deletion does not imply the immediate deletion of data or the modification of the processing. In any case, we will answer you in detail as soon as possible, within the deadlines set by the GDPR.

7.- Complaint to the Hellenic DPA

You also have the right to lodge a complaint with the Hellenic Data Protection Authority (HDPa): Kifissias 1-3, PC 115 23, Athens, Greece, Telephone: +30-210 6475600, E-mail: contact@dpa.gr, <https://www.dpa.gr>.

Last update: February 2021

POLICY FOR REPORTING INCIDENTS OF VIOLATIONS OF EU LAW/ WHISTLEBLOWING POLICY

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1. Introduction

The corporation "ARITI S.A. Pharmaceutical and Medical Products" (hereinafter "the Company"), based in Acharnes, Attica, at 52 Tatoiou Avenue, Tax ID 094251753, complies with all measures and obligations related to the implementation of Law 4990/2022 for the protection of individuals reporting violations of Union law.

2.- Definitions

- a) "Report": The oral, written, or electronic submission of information concerning violations of EU law.
- b) "Internal Report": Submission of information to the Internal Reporting and Monitoring Officer (hereinafter IRMO) of a public or private legal entity.
"External Report": Submission of information to the National Transparency Authority (hereinafter NTA).
"Whistleblower": The person providing or disclosing information about violations obtained within the scope of their work.

"Subject of Report": The natural or legal person named in a report or disclosure as the entity involved in or associated with the alleged violation.

"Retaliation": Any direct or indirect action or omission within the work environment causing unjustified harm or disadvantage to the reporter linked to an internal or external report or public disclosure.

"Reasonable Grounds": A justified belief by a person with similar knowledge, training, and experience that the information provided is truthful and constitutes a violation of Union law.

"Public Disclosure": Direct dissemination of information to the public regarding violations.

"Inadmissible Report": Includes reports outside the scope of this Policy, unclear or incomplete reports, malicious or frivolous submissions, and repetitive or excessive claims.

"Anonymity": The condition where the source or identity of the report is unknown to the recipient.

3.- Scope of Policy

This Policy applies to all Company personnel and associates, including current and former employees, employees under independent service contracts, shareholders, management, and even volunteers.

This Policy shall be applied in conjunction with the Company's other policies and instructions to its employees/partners.

4.- Purpose / Principles

The purpose of this Policy is to create and establish a working environment that respects and protects those who report violations of EU law within the Company. More specifically, the purpose of this Policy is to create a clear and simplified system for the internal reporting of violations of EU law and to protect persons who report such violations.

A fundamental and inviolable principle of this Policy is both to protect the anonymity and confidentiality of the data of anonymous reporters and to ensure that the anonymous reporter will not suffer any negative consequences (retaliation). Maintaining the working relationship and future cooperation with the petitioner is a commitment for our Company..

5.- Reprehensible Behaviors

The Policy covers the following types of violations:

- EU Public procurement laws
- financial services, products and markets, as well as the prevention of money laundering and the financing of terrorism,
- product safety and conformity,
- transport security,
- environmental protection,
- radiation protection and nuclear safety,
- food and feed safety, and animal health and welfare,
- public health,
- consumer protection,
- the protection of privacy and personal data,
- security of network and information systems,
- Union competition and State aid rules,
- relating to the internal market concerning acts in breach of the rules on company taxation or arrangements the purpose of which is to secure a tax advantage that frustrates the object or purpose of the applicable corporate tax legislation.

Disputes about managerial decisions or policies, personal matters or disagreements between colleagues or with a supervisor, and rumours are not covered by this Policy.

6.- Preventive Measures

The Company demonstrates a zero-tolerance policy for the violations outlined above, ensuring confidentiality and respect for human dignity. More specifically, the Company:

- Encourages the maintenance of a working climate where respect for human dignity, cooperation and mutual assistance are core values,
- maintains a procedure for the management of reports,
- undertakes actions to raise awareness among employees of healthy patterns of behaviour,
- train its staff in the procedures for managing relevant incidents.

A detailed report of the Company's actions to prevent such behaviours is provided in the Corporate Policy entitled "Compliance Management / Incidents".

7.- Procedure for Receiving and Examining Reports

A) COMMUNICATION CHANNELS - DESIGNATED PERSONNEL

The Company appoints Ms. Ekaterini Dritsas of Demetriou, to whom employees can address for the relevant issues, as the Officer for Receiving and Monitoring Reports (O.R.M.R.) within the company, responsible for guiding and informing employees about the possibility of submitting reports within the company, plans and coordinates training activities on ethics and integrity, receives and handles with confidentiality the relevant reports. O.R.M.R. shall be bound by a Declaration of Confidentiality and Confidentiality in respect of personal data which may come to his/her knowledge in the performance of his/her duties.

(B) INVESTIGATION AND EXAMINATION OF REPORTING WITH INDEPENDENCE AND PROTECTION OF THE CONFIDENTIALITY AND PERSONAL DATA OF REPORTING PARTICIPANTS

The receipt, investigation and management of petitions shall be carried out promptly and impartially, in a manner that respects human dignity and ensures the protection of the confidentiality and personal data of the petitioners and the petitioners.

- Submission: The internal report shall be submitted

e-mail	speakup@ariti.gr
Contact Number	210-8002635
In-person meeting	By request, within a reasonable timeframe

A summary of the report, without, however, identifying the reporting party and the reporting party, may be communicated to the Company's management.

The Company encourages reporting persons to provide as much detail as possible about their concerns, while recognizing, of course, that their role is not to investigate the report.

Where possible, it is recommended to provide the following information:

- a description of the alleged infringement,
- existing information supporting the allegation (e.g. e-mail correspondence and photographs).

- **Receipt:** O.R.M.R. shall receive reports of violations and acknowledge receipt of the report to the petitioner within seven (7) working days of receipt.

Specifically for oral reports, when a person requests a meeting with the DPO to make a report, subject to the consent of the reporting party, complete and accurate minutes of the meeting shall be kept in a fixed and retrievable format prepared by the DPO, giving the reporting party the opportunity to verify, correct and agree with the minutes of the meeting by signing them. If the minutes are refused for signature, the CPSO shall make a note to that effect.

- **Archived:** Where the report is (i) unintelligible, or (ii) improperly submitted, or (iii) does not involve a violation of Union law, or (iv) there are no serious indications of such a violation, the DPA may close the procedure by placing the report on file. The decision to file is communicated to the petitioner, who has the right to resubmit to the EDPS through the external reporting channel.

In order to deal with the report, the CPSO may be assisted by competent bodies of the Company or competent bodies, as the case may be, and, where appropriate, by external consultants/associates, in particular Legal Counsel, specialised in the field of Reports, whose participation contributes to the verification of the Report in question, ensuring the confidentiality of the identity of the Petitioner and any third party named in the Report, preventing access to it by unauthorised persons, and, where possible, ensuring the anonymisation of any personal data contained in the Report.

- **Monitoring:** The O.R.M.R. shall follow up on reports and maintain communication with the petitioner and, if necessary, request further

information from the petitioner. In addition, it shall take the necessary steps to ensure that the report is followed up by the competent bodies of the Company or the competent bodies, as appropriate.

- **Completion:** Actions taken to administer a report must be completed within a reasonable period of time, not to exceed 3 months from the acknowledgement of receipt, or if no acknowledgement has been sent to the petitioner, 3 from the expiry of 7 working days from the submission of the report. The CAA shall inform the petitioner of the action taken.

Upon completion of the investigation and verification phase of the reported facts, the CPSO shall prepare a report summarising the investigations carried out and the evidence gathered. These results are communicated to the relevant Company departments and the heads of the departments involved in order to determine an intervention plan and decide what measures should be taken to protect the Company, the Petitioner and any other persons involved.

8.- Anonymous Reports

Our Company also accepts anonymous reports, provided that they are otherwise certain and adequately documented. Even in the case of anonymous reports, our Company makes every effort to protect the personal data reported and the identity of the reporter and the person reported during the investigation of the incident is disclosed only to authorized and competent persons to receive, monitor and investigate the reports.

9.- PROHIBITION OF RETALIATION AGAINST THE PERSON CONCERNED

Any form of retaliation against the petitioner for violations is prohibited, in particular: (a) suspension, dismissal or other equivalent measures; (b) demotion, failure or deprivation of promotion; (c) removal of duties, change of place of work, reduction of salary, change of working hours; (d) deprivation of training; (e) negative performance evaluation or negative professional recommendation; (f) reprimand, (g) coercion, intimidation, harassment or marginalisation; (h) discrimination or unfair treatment; (i) failure to convert a temporary employment contract into a permanent contract; (j) non-renewal or early termination of a temporary employment contract; (k) intentional harm, including damage to

reputation, in particular on social media, or financial loss, including business loss and loss of income; (l) inclusion on a blacklist ('blacklist'), on the basis of a sectoral or industry-wide formal or informal agreement, (m) early termination or cancellation of a contract for goods or services; (n) revocation or cancellation of a diploma or licence; (o) referral for psychiatric or medical treatment; (p) refusal or denial of reasonable accommodation to persons with disabilities.

10.- External Report

Individuals reporting violations of Union law may either resubmit to the external reporting channel reports already submitted to internal channels or submit their reports directly to the external reporting channel.

A single external reporting channel for all categories of reports, irrespective of the type or body, is thus established by the Law as the National Transparency Authority ("NTA")

11.- Personal Data

Any processing of personal data under this Policy takes place in accordance with national and European legislation on personal data in conjunction with our Company's relevant Policies. The data of all those involved in the report in question is protected and will not be disclosed to any third party other than the authorised members of staff who are authorised to receive, or monitor, the reports, unless the reporter consents to this. Personal data contained in reports shall be processed solely in relation to the report in question and in order to verify the validity of the report and subsequently to investigate the reported incident.

Exceptionally, disclosures in the context of investigations by competent authorities or in the context of judicial proceedings shall be made lawfully after prior written notification to the reporting party of the reasons for the disclosure of his/her identity and other confidential information.

Personal data contained in a report, but not related to it, shall be deleted within a reasonable time.

The O.R.M.R shall process only the data necessary for the investigation of the report, which shall be retained for a period of five (5) years, unless there are serious reasons requiring their retention for a longer period, such as pending legal

proceedings, in which case the retention period shall be extended to twenty (20) years.

Any whistleblower or person named in the petition or involved in a petition may at any time contact the Company to exercise his/her rights provided for by the General Data Protection Regulation (Articles 15-22), such as, inter alia, access to his/her data (in order to know which data are processed by the Company and for what purpose, as well as the recipients thereof), information, modification of his/her data, in the cases provided by law, restriction of data processing, deletion of his/her data, etc.