



INTERNAL WHISTLEBLOWING SYSTEM PRIVACY POLICY,

the IWS PRIVACY POLICY

(English translation*)

In Madrid, May 2025

* This version is a translation of the internal regulation that was originally written in Spanish (check [here](#)). In the event of any discrepancy between the two versions, the Spanish version shall prevail over the English version.

* Esta versión es una traducción de la regulación interna original que se redactó en español (revisar [aquí](#)) En caso de discrepancia entre las dos versiones, la versión en español prevalecerá sobre la version inglesa.

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1. Data Controller

- 1.1. Sports Reinvention Entertainment Group SL (the "Company", "Sportian" or the "Controller") is the controller for the processing of personal data processed through the **Internal Whistleblowing System** (hereinafter, the "IWS"; "Internal Whistleblower Channel/System"; "Whistleblower Channel" and/or "Whistleblowing Channel").
- 1.2. The Data Controller respects the fundamental rights and freedoms of individuals, including, among others, the fundamental and inalienable right to the protection of personal data.
- 1.3. This Policy, in accordance with the Company's Compliance Plan, reflects the firm commitment of the Controller with the processing of your personal data, making available to you the information on the use that we will make, as the Controller, of your personal data.
- 1.4. If you have any questions regarding the processing of your personal data, please contact the Controller at the following address: dataprotection@sportian.com.
- 1.5. You can contact our Data Protection Officer through the following contact details: Postal address: C/ Torrelaguna, 60, Madrid (Spain) E-mail: dataprotection@sportian.com.

2. Purpose of the Processing of Personal Data

- 2.1. As Data Controller, this data processing has its legal basis in the fulfillment by the Company of the obligations to have an Internal Whistleblowing System and compliance with the provisions of Law 2/2023, which basically result in managing and processing the communications submitted through the IWS (the "Communication" and / or "Complaint").
- 2.2. Management of the procedure referred to in Article 9 of Law 2/2023, which basically consists of managing and processing the Communications submitted through the IWS.

3. Categories of Personal Data Processed

The categories of personal data that we process as data controller depend on the status of the data subject in the Communication submitted through the IWS.






- 3.1. **Whistleblower:** The personal data provided, if any, in the Communication by the whistleblower.
- 3.2. **Affected Person/s:** The personal data provided, if applicable, in the Communication by the whistleblower, and which may be merely identifying and contact data, up to personal characteristics, academic and professional data, employment details, economic, financial and insurance data and, potentially, specially protected data.
- 3.3. **Witness/s:** the data collected in the communication and/or by them in the course of the investigation and/or interviews and resolution will be processed.
- 3.4. **Third party/s:** the data collected in the communication and/or by them in the course of investigation and/or interviews and resolution will be processed.

- 3.5. **Complainant/s:** the data collected in the communication and/or by them, in the course of the investigation and/or interviews and resolution will be processed.

4. Sources of Personal Data Processed

- 4.1. The whistleblowers' data are obtained from the communication or complaint filed through the IWS.
- 4.2. The data of the affected persons, Witnesses, Complainants and Third Parties are obtained from the communication filed with the IWS and/or during the investigation process carried out.
- 4.3. Data may be collected from third parties, e.g. departments of the company of the Data controller, companies of the group of companies to which the Data controller belongs, etc.

5. Legitimate Basis for the Processing

- 5.1. We will process your personal data on the **legitimate basis** of compliance with the legal obligations set forth in Law 2/2023 and in particular in the articles specified below.
- 5.2. In the event that **specially protected data** (such as health data, sex life, trade union membership, political opinions, religious convictions...) are processed, in addition to complying with the above-mentioned legal obligations, they will be processed on the basis that the processing of such personal data is necessary for the formulation or defense of claims by the Company or the entity to which the affected person belongs (art. 9.2.f. GDPR).
- 5.3. Persons making a communication **through the Internal Whistleblowing System** must guarantee that the personal data provided are true, accurate, complete and up to date.
- 5.4. When processing personal data, the following **regulations** shall be taken into account:
-  **Art. 6.1.c.** of EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 (herein referred to as "**GDPR**") for internal channels when it is mandatory to have it; and art. 6.1.e if it were not mandatory.
 -  **Art. 9.2 of GDPR** for the processing of special categories of personal data.
 -  **Spanish Law 3/2018** of Protection of Personal Data (hereinafter "**LOPDyGDD**").
 -  **Spanish Law 7/2021** on the protection of Personal Data processed for the purposes of prevention, detection, investigation and prosecution of criminal offenses and enforcement of criminal penalties.
 -  **Articles 29 to 34 of Spanish Law 2/2023** regulating the protection of persons who report regulatory violations and the fight against corruption.

6. Data Processors

- 6.1. The data processors or providers of legal services, IT systems and technological tools of the Controller may access your personal data in the management of the communication, however, such data processing will always be carried out under the directives of the Controller and will be deleted without delay after the corresponding indication by the Controller as indicated by Spanish Law 2/2023 (in strict compliance by Sportian with the provisions of Article 32 of Spanish Law 2/2023).

7. Transfer of Personal Data to Third Parties

- 7.1. In the event that the communications received may end in a procedure that requires the adoption of disciplinary measures by Sportian, Sportian will transfer your personal data to the corresponding department of that entity for the adoption, where appropriate, of the corresponding disciplinary measures in relation to the conclusions and/or recommendations of the corresponding Report as a result of the communication received in the IWS.
- 7.2. Also, your data may be transferred to the Public Prosecutor's Office for compliance with the obligations set forth in Spanish Law 2/2023 or, in the event that the communication submitted ends with the initiation of legal proceedings, your personal data will be transferred to the Judges and Courts on the legal basis of the legitimate interest of the Data Controller linked to our right to effective judicial protection.
- 7.3. If during the investigation process it has been necessary to collect specially protected personal data, such data will be transferred, in addition to the legitimate interest of the Controller, on the basis that the processing is necessary for the formulation or defense of claims.

8. International Data Transfers








- 8.1. Not foreseen. If strictly necessary, and due to the type of information received or collected, and to the specific circumstances of the case, it is necessary to carry out some type of international transfer, the data subject will be informed of all the circumstances of the transfer, including the identification of the recipient, the destination country and the guarantee mechanism in accordance with the provisions of GDPR and LOPDyGDD.

9. Retention Period of Personal Data


- 9.1. The data included in the communications and those derived from the investigation procedure shall be kept during the processing of the file until the final decision is adopted, and may be duly blocked and/or anonymized during the period of limitation of legal actions against the Controller.

10. Data Subjects Rights



- 10.1. You **will have recognized** the:

-  **Right of access:** you have the right to obtain confirmation as to whether Sportian processes your personal data, as well as the right to access such data.
-  **Right of rectification:** you may request the modification or rectification of inaccurate personal data.
-  **Right of deletion:** you may request the deletion of your personal data when possible.
-  **Right of limitation of processing:** In certain circumstances, and provided that the accuracy, legality, or necessity of the data processing is doubtful, you may request the limitation of the processing of your data, in which case they will only be kept for the exercise or defense of claims.
-  **Right to object:** you may oppose the processing of your data for the purpose you specify. Sportian will cease processing the data, except for compelling legitimate reasons, or the exercise or defense of possible claims.
-  **Right not to be subject to automated individual decisions:** you have the right not to be subject to a decision based solely on automated processing, including profiling, that is likely to produce legal effects or similarly significantly affect you.
-  **Right of portability:** if the website allows it, you may exercise the right to the portability of your data, in a structured, commonly used and machine- readable format, and to transmit them to another data controller, provided that the communication and/or complaint and the circumstances of the case allow it and it is advisable and deemed appropriate by law.

When personal data is obtained directly from the interested parties, they will be provided with the information referred to in articles 13 of GDPR and 11 of the LOPDyGDD.

-  The right, as whistleblower, and of those who make a **public disclosure**, to **be expressly informed** that their identity will in any case be kept confidential, that it will not be communicated to the persons to whom the facts reported refer, nor to third parties. Whistleblowers and those who make a public disclosure shall also be expressly informed that their identity will in any case be kept confidential and that it will not be communicated to the persons to whom the facts reported refer or to third parties. Data subjects may exercise the rights referred to in Articles 15 to 22 of GDPR. In the event that the data subject to whom the facts related in the communication or to whom the public disclosure refers exercises the right to object, it shall be presumed that, unless proven otherwise, there are compelling legitimate grounds that legitimize the processing of his or her personal data.

10.2. **You may exercise your rights** at any time and free of charge in the following ways:

-  By sending an **e-mail** to dataprotection@sportian.com indicating the right you wish to exercise and your identification data.
-  By sending a **written request** to the attention of the Instructor of the Internal Whistleblowing System of Sportian, calle de Torrelaguna, nº 60, 28043, Madrid, indicating the right you wish to exercise and your basic identification data to verify your identity, being able to request, where appropriate, accreditation of these.

10.3. On the other hand, we inform you that you have the **right to file a complaint** with the Spanish Data Protection Agency (www.aepd.es; writing addressed to Calle de Jorge Juan, nº 6, 28001, Madrid; or through the [electronic register of the AEPD](#)) if you consider that a violation of data protection legislation has been committed with respect to the processing of your personal data.

11. Security Measures

- 11.1. if you consider that a violation of data protection legislation has been committed with respect to the processing of your personal data.
- 11.2. Additionally, reinforced security measures may be established, and precautions may be taken to ensure compliance with the duty of confidentiality.

12. General Information Clause

- 12.1. The personal data will be processed by the Controller and incorporated into the processing activity "Internal Whistleblowing System", whose purpose is to comply with the legal obligation to manage the procedure referred to in Article 9 of Spanish Law 2/2023, regulating the protection of persons who report regulatory infringements and the fight against corruption.
- 12.2. Personal data may be communicated to the Judicial Authority, the Public Prosecutor's Office or to the competent administrative authority in the context of criminal, disciplinary or sanctioning investigations.
- 12.3. The data will be kept for the time necessary to fulfill the purpose for which they have been collected and to determine the potential responsibilities that may arise from such purpose and from the processing of the data.
- 12.4. To request access, rectification, deletion or limitation of the processing of your personal data or to oppose its processing, you can write to Sportian, as data controller, at calle de Torrelaguna, nº 60, 28043, Madrid, via e-mail dataprotection@sportian.com, and/or file a complaint with the Spanish Data Protection Agency (through: the website www.aepd.es; by writing to calle de Jorge Juan, nº 6, 28001, Madrid; or through the [electronic register of the AEPD](#)).

13. Policy Ownership

- 13.1. This Policy is the property of the Compliance Department. Please contact dataprotection@sportian.com to ask any questions you may have.

14. Effective Date and Updates

- 14.1. This Policy has been created by the Compliance Department and is effective from the moment of its publication.
- 14.2. The content of this Policy will be updated and revised periodically, following the same procedure as in its preparation, and adapting it to changes in the company in general and Sportian in particular, and the latest approved version will be available on the following URL: <https://www.sportian.com/ethics>.