



PERSONAL DATA PROCESSING CLAUSE IN THE WHISTLEBLOWING CHANNEL

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PRIVACY POLICY

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Data controller

The personal data collected through the Whistleblowing channel (denuncias@dypsolar.com) will be processed by DVP Solar Worldwilde, S.L. ("DVP SOLAR"), with registered office in Seville, Avenida de la República Argentina nº 25, 7ª Planta, módulos 3 y 4 (C.P. 41011), N.I.F. B-02669059, and e-mail address for these purposes at denuncias@dypsolar.com.

Purposes

The personal data sent through the Whistleblowing channel will be processed for the purpose of managing complaints regarding the commission of irregularities or acts contrary to the ethics, legality or rules and protocols of internal operation of DVP SOLAR, as well as to carry out the necessary actions for the investigation of the reported facts, including, where appropriate, the

legal measures that may apply.

Personal data will be always treated in the strictest confidentiality of both the complainant and the respondent and will not be used for any purpose other than that indicated. Particularly, if the complainant identifies him/herself, DVP SOLAR guarantees the confidentiality of the person who brought the facts to its attention.

Legal basis

The legal basis for the processing is the compliance with the legal obligation to resolve the queries made according to the provisions of Organic Law 10/1995, of 23 November, of the Criminal Code and, where appropriate, the public interest in the terms established in art. 6.1.e) of Regulation (EU) 2016/679, and defined in Article 24 of Organic Law 3/2018 of 5 December on the

Protection of Personal Data and Guarantee of Digital Rights, consisting of creating and maintaining an information system for internal complaints and investigating possible irregularities or acts contrary to the ethics, legality or internal operating rules and protocols of DVP SOLAR.

The processing of your personal data is strictly necessary to manage the Whistleblowing channel and to comply with the legal obligations. Under no circumstances will DVP SOLAR carry out automated decisions based on the data submitted.

Data retention

DVP SOLAR will keep the personal data for the time necessary to decide whether to initiate an investigation into the reported facts and, where appropriate, after three months from the entry of the data, it will delete the data from the Whistleblowing channel, keeping them in another system for the investigation of the reported facts, or to demonstrate the operation of the crime prevention model and to the extent that responsibilities may arise. If it is not considered appropriate/necessary to expedite the complaint, the data may be retained in an anonymized form.

Addressees

Personal data may only be accessed by DVP SOLAR for the management of the Whistleblowing channel, as well as by third parties who are legally or contractually bound to the Parties for the provi-

sion of ancillary services necessary for the normal functioning of the processing services (competent authorities, courts, and tribunals, as well as consultants, auditors and advisors of DVP SOLAR).

Additionally, the data may be communicated to other recipients when it is necessary for the adoption of disciplinary measures (other entities of the group) or for the processing of legal proceedings, where appropriate. In particular, personal data may only be accessed by the following entities of the DVP SOLAR Group when strictly necessary for the management of the Whistleblowing channel and for the adoption, where appropriate, of disciplinary measures or the processing of legal proceedings: DVP Solar Worldwide, S.L., DVP Solar Italy, S.r.l., DVP Solar Germany GmbH; DVP Solar Colombia SAS and DVP Solar France SAS. In no case shall international transfers of data be made to third countries for which the European Commission has not issued an adequacy decision or, failing that, adequate safeguards have been given by means of the appropriate instrument (standard contractual clauses).

Exercise of rights

Data subjects may exercise, under the terms provided for by current legislation, the right of access, rectification or deletion of data, limitation, or opposition to the processing of data, as well as the right of portability, by writing to DVP SOLAR at denuncias@dypsolar.com. They could also file a complaint to the competent supervisory authority.





DVP SOLAR
- DEVELOPING RENEWABLE HORIZONS -

