



WHISTLEBLOWING PRIVACY NOTICE

This privacy notice aims to inform individuals about how we process the personal data of whistleblowers or persons other than the reporting person who are protected and of persons against whom the report has been filed ("you").

INFORMATION ABOUT US

The data controller is EURO GAMES TECHNOLOGY LTD, UIC 130947038, with headquarters and address of management Sofia, Vrana area - Lozen - Triagalnika, 4 Maritsa Str., ("Company", "We")

The contacts of our Data Protection Officer are:

Data Protection Officer: att. Desislava Dimitrova-Cholakova

Email: dpo@egt.com EURO GAMES TECHNOLOGY LTD

PERSONAL DATA

The Company may process some or all of the following categories of personal data of persons who report or publicly disclose information about breaches (whistleblowers), of persons other than the reporting person who are protected and of persons against whom the report has been filed, namely:

Data to identify you with	Names, PIN or date of birth capacity in which you submit the report
Your contact details	Current or permanent address; email; telephone
Other information included at your discretion in your report	Other data you have included at your report
Other information provided on the basis of your explicit consent	We could also process special categories of data, subject to your explicit consent.
Information relating to the persons to whom protection is provided as well as to the persons concerned	Names, position, capacity of the person, telephone number, correspondence address and/or e-mail address, as well as other data that may be provided in connection with the submitted report

GROUND FOR DATA PROCESSING

The legal ground for the processing of personal data described above is for the purpose of fulfilling a statutory obligation under the Protection of Persons Who Report or Publicly Disclose Information on Breaches Act (Act), namely: for the purpose of providing an internal channel for reporting breaches.

PURPOSES OF DATA PROCESSING

The purposes of personal data processing are as follows:

1. Registration of the report and its review;
2. Providing protection to the reporting person, their related persons and the person concerned;
3. To comply with an obligation imposed by Bulgarian or European Union law in the context of investigations by national authorities or legal proceedings, including with a view to ensuring the rights of defense of the person concerned;
4. To hold the reporting person accountable and protect the legitimate interests of the Company in the cases specified by law.

CONFIDENTIALITY OF INFORMATION

We protect information related to reported breaches, including but not limited to the identity of whistleblowers and persons concerned, and take appropriate measures to protect such information.

Access to the information related to the reported breaches, including the identity of the reporting and concerned persons, shall be ensured, under the terms of the Act, respectively only to employees and other persons within the Company and to the person responsible and designated for the registration of reports (incl. when this person is outside the structure of the Company) to whom these data are necessary for the performance of their official and/or contractual obligations.

Within the Company, only the employees responsible for handling reports have access to the information. A person under the preceding sentence, against whom a report has been submitted, shall not have access to the information related to this signal, except when the provision of the information is required by law. Access may also be granted to other persons depending on the specifics of the case and access is allowed by the Company on a case-by-case basis.



The disclosure of the identity of the whistleblower and/or other information about the report shall be permitted only with the express consent of the reporting person.

Notwithstanding the above, the identity of the reporting person and any other information from which his or her identity can be directly or indirectly known, may be disclosed where this is a necessary and proportionate obligation imposed by Bulgarian or European Union law in the context of investigations by national authorities or legal proceedings, including with a view to ensuring the rights of defense of the person concerned.

YOUR RIGHTS

To whistleblowers, to persons other than the whistleblower who are protected and to persons against whom the report has been filled, the Company provides all rights provided in local and European legislation, namely:

1. upon request, obtain all necessary information relating to the processing of the data you provide, including, if possible, a copy;
2. to request access to, correction or deletion/erasure of personal data or restriction of the processing of personal data, if the prerequisites for this exist;
3. to object to the processing, as well as to file a complaint with the supervisory authority – CPDP (Sofia 1592, bul. "Prof. Tsvetan Lazarov" No2 or www.cdpd.bg) in case of unlawful data processing;
4. withdraw your consent at any time without causing negative consequences for you where the ground for processing is consent;
5. to exercise your right of portability.

In certain cases, informing the person against whom a report has been filled at an early stage may be detrimental to the internal handling of reports. When, in the Company's judgment, it is considered that there is a high risk that the provision of access will impede the procedure or violate the rights and freedoms of others, the Company may impose a restriction on the provision of specific information or a delay in its provision.

All requests related to personal data such as: information, access, deletion, withdrawal of consent, etc. described above shall be filled in writing, signed by you and submitted for processing to the Company to the following e-mail address: dpo@egt.com or to the registered office of the Company. The request must contain information about three names and, if the request is about specific personal data, they should be specified, along with describing exactly which right is exercised.

MEASURES FOR THE PROTECTION OF PERSONAL DATA

The Company has implemented technical and organizational measures to protect information related to reported breaches, including the identity of the whistleblower and concerned persons, against unauthorized, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other types of unlawful processing. Special attention is paid to sensitive data. Some of the measures taken are: encryption, pseudonymization, reservation, access control, strict confidentiality, periodic training, etc.

TRANSFER OUTSIDE THE EUROPEAN ECONOMIC AREA

Your personal data is not transferred outside the EU/EEA. In the event of a need for such processing, appropriate safeguards will be used to ensure that such transfer takes place in accordance with applicable data protection rules, including legal bases.

RETENTION PERIOD

- data and materials on a specific signal shall be kept for a period of 5 (five) years.
- in case of disciplinary, administrative-criminal, criminal and/or civil proceedings, the data shall be stored until the final conclusion of these proceedings and for a period of 5 (five) years thereafter, for the purpose of establishing, exercising and defending against legal claims, administrative and other acts, unless a law or other normative act specifies a shorter or longer retention period.
- data which are found to be clearly not related to a report shall be kept for up to 2 months from the establishment of their irrelevance.

Update the Privacy Notice

This notification may be subject to amendment as last updated on 04.05.2023. Any future changes or additions to the processing of personal data described in this notice that affect you will be communicated to you through an appropriate channel, depending on the usual channel of communication.