

**PRIVACY POLICY LG ENERGY SOLUTION WROCLAW SP. Z O.O.
FOR WHISTLEBLOWERS REFERRED TO IN THE INTERNAL PROCEDURE FOR
REPORTING VIOLATIONS OF THE LAW AND FOLLOW-UP
IN LG ENERGY SOLUTION WROCLAW SP. Z O.O.
(INFORMATION CLAUSE)**

Dear Madam or Sir,

the following is detailed information regarding the processing of your personal data by LG Energy Solution Wrocław Sp. z o.o. in connection with your reporting of violations within the internal procedure for reporting violations of the law and follow-up in LG Energy Solution Wrocław sp. z o.o.

At the outset, we explain that:

“personal data” means any information about 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, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person;

“processing (of personal data)” means an operation or set of operations performed on personal data or sets of personal data in an automated or non-automated manner, such as collection, recording, organizing, structuring, storing, adapting or modifying, retrieving, viewing, using, disclosing by transmission, dissemination or otherwise making available, matching or linking, limiting, erasing or destroying;

“RODO” is Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

■ **Who is the administrator of your personal data?**

The administrator of your personal data is **LG Energy Solution Wrocław Sp. z o.o.** with its registered seat in Biskupice Podgórne, at LG 1A, 55-040 Kobierzyce (**“Company”**).

You can contact the administrator as follows:

- by e-mail to the following e-mail address: rodo.gdpr@lgensol.com;
- by sending traditional correspondence to the Company’s address indicated above (please include the note: “personal data”).

■ **Administrator declaration**

The Company pays great attention to ensuring the security of information, in particular personal data. In this respect, the Company strictly complies with applicable legal provisions and has implemented appropriate organizational and technical measures to prevent personal data security breaches.

■ **Where do we obtain your personal data?**

Your personal data is provided directly by you in connection with a submitted internal notification (“**Notification**”) as part of the Internal Procedure for Reporting Law Violations and Taking Follow-up Actions at LG Energy Solution Wrocław sp. z o.o. (“**Procedure**”), implemented in the Company in order to fulfill the obligations arising from the Act of June 14, 2024 on the protection of whistleblowers (“**UOS**”).

■ **What are the purposes and legal basis for the processing of your personal data and how long will the Company process this data?**

Processing is necessary for the purposes of the resulting from legally justified interests pursued by the Company (Article 6(1)(f) of the GDPR), i.e. fulfillment of the Company’s obligations arising from UOS, including tasks related to receiving and verifying Notifications and taking follow-up actions.

Your personal data will not be disclosed to third parties, unless with your voluntary and express consent (Article 6, paragraph 1, letter a of the GDPR). Providing your personal data does not affect the recognition of your report.

Personal data processed in connection with the accepted Notification or taking follow-up actions under the Procedure and related documents are stored and processed by the Company for a period of 3 years after the end of the calendar year in which the follow-up actions referred to in the Procedure were completed or after completion of proceedings initiated by these actions.

Personal data obtained as part of the obligations arising from the Procedure or UOS, which are not relevant to the implementation of these obligations, are not collected, and in the event of accidental collection, they are immediately deleted. These personal data are deleted within 14 days from the moment it is determined that they are not relevant for the Company’s fulfillment of its obligations under the Procedure or UOS.

■ **Automated decision-making, including profiling**

In the process of processing personal data as part of the obligations arising from the Procedure or UOS, the Company does not use automated decision-making, including profiling.

■ **Who may we disclose your personal data to?**

The Company may disclose personal data to third parties in accordance with the table below:

Recipient	Purpose
Persons authorized by the Company	1. Performing tasks arising from the Procedure and UOS on behalf of the Company;
Courts, law enforcement agencies and authorized administrative bodies	2. In cases where it is consistent with the law, in particular if it proves necessary in court, preparatory or administrative proceedings;
Authorized representatives of the Company (e.g. law firms, tax advisors)	3. Representing the Company before the court or other entities in judicial and administrative matters, including for the purpose of pursuing or defending claims;
Third parties whose personal data are processed in connection with your Report	4. Fulfillment of the Company’s obligations arising from Art. 14 and 15 of the GDPR, unless your Application meets the conditions referred to in Art. 6 UOS or you have not consented to the disclosure of your identity.

■ **Transfer of personal data to third countries**

Personal data are not transferred to third countries or international organizations.

■ **What rights do you have in connection with the processing of your personal data by the Company?**

In connection with the processing of your personal data, you have the right to request:

1. **access** to personal data, including obtaining confirmation from the Company whether personal data are being processed, and if so, obtaining access and information about this data, in accordance with the principles set out in Art. 15 GDPR (considering the restrictions resulting from the provisions of UOS);
2. **rectification or supplementation** of incorrect or incomplete data, in accordance with the principles set out in Art. 16 GDPR;
3. **deletion of data** if the Company no longer has a legal basis for processing it or the personal data are no longer necessary for the purposes of processing, in accordance with the principles set out in Art. 17 GDPR;
4. **restrictions on data processing** in accordance with the principles set out in Art. 18 GDPR;
5. **transfer of data** provided on the basis of consent, in accordance with the principles specified in Art. 20 GDPR;
6. **object** to the processing of data for the legally justified purposes of the Company, for reasons related to the employee's special situation, in accordance with the principles set out in Art. 21 GDPR;
7. **withdrawal of consent** to the processing of data based on the expressed consent. Withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal

To exercise the above-mentioned rights, you should contact the Company in writing (correspondence sent to the address of the Company's registered office) or by sending an e-mail to the following address: rodo.gdpr@lgensol.com and inform us which right and to what extent you want to exercise.

At the same time, we would like to inform you that in the cases specified in the GDPR, the Company may refuse to implement some of the above. rights, in particular if:

1. the request comes from an unauthorized person;
2. the person submitting the application cannot be clearly identified;
3. execution of the request violates or may violate the interests of third parties;
4. processing is necessary to establish, pursue or defend claims or the data must be processed due to the Company's legal obligations.

■ **The right to submit a complaint with the supervisory authority**

If you believe that your personal data is being processed contrary to applicable law, you may submit a complaint with the supervisory authority, which in Poland is the President of the Personal Data Protection Office with its registered office at ul. Stawki 2, 00-193 Warszawa. Detailed information on the complaint procedure can be found on the website of this Office, currently: <https://uodo.gov.pl/pl/>. However, before you submit an official complaint or take other legal steps, we suggest you contact us

to clarify any doubts or objections regarding the processing of your personal data. We guarantee that we will handle the case with the utmost care.

■ **Additional information**

We reserve the right to change the content of this document at any time, in particular when such a need results from changes in generally applicable legal provisions, their interpretation, conclusions resulting from court decisions or organizational, procedural and other changes regarding the Company.