

PRIVACY NOTICE WHISTLEBLOWING

FOR WHAT LEGAL BASIS, DO WE PROCESS PERSONAL DATA?

We, Avia Solutions Groupⁱ (hereinafter – **ASG**), the largest aerospace business holding in Central & Eastern Europe offering aviation services worldwide strive to maintain the highest standards of openness, decency, integrity, and accountability wherein any breaches or wrongdoing are addressed quickly and protecting the employees, maintaining a healthy and an efficient working culture is a priority.

In the light of the above-mentioned and following the legal obligation to establish channels and procedures for internal reporting and follow up on the Infringement, we implement and adhere to the Whistleblowing Policy and procedures in relation thereto.

Please be advised that for the purpose of investigation of your Disclosure, your personal data shall be processed in accordance with Article 6 Part 1. c) of the GDPR, i. e. legal obligation to establish an internal reporting channel to which we are subject and Article 6 Part 1. f) of the GDPR, i. e. our legitimate interest to handle fraud, corruption or other wrongdoings in the Company and to defend against requirements and/or claims and investigations of the competent authorities, litigations (if any) or, if necessary, to keep such data regarding possible investigations on allegedly illegal or criminal acts.

WHAT PERSONAL DATA AND FOR WHAT PURPOSES DO WE PROCESS?

- **About the Whistleblower:**

- Name, surname, Date of birth (*not mandatory*) – for the purpose of identification of a whistleblower.
- Telephone number and (or) e-mail address – for the purpose of contacting a whistleblower for follow-up and (or) for specifying details about perpetrated or suspected Infringement.
- Workplace and position (*not mandatory*) if it links to Avia Solutions Group or its subsidiaries (current or former employment relationships or other contractual relationships) – for the purpose of ensuring/guaranteeing the rights of a whistleblower (prevention of adverse effects).
- Other information provided voluntarily by a whistleblower or processed by ASG or any of its subsidiaries – for the purpose of investigation of the perpetrated or suspected Infringement.

In principle, we do not request or process any special categories of personal data (e.g., information about health, racial and/or ethnic origin, religious and/or ideological convictions, trade union membership or sexual orientation), unless such special categories of personal data are voluntarily disclosed by the whistleblower or other concerned persons.

- **About other concerned persons (suspected of wrongdoing, persons who have participated or could have been involved in the Infringement, witnesses):**

- Any information provided by a whistleblower and concerned persons or collected by ASG or any of its subsidiaries during the investigation (e. g., name, surname, workplace and position, telephone number, e-mail address, committed acts or omissions, etc.) – for the purpose of investigation of the perpetrated or suspected Infringement.

HOW DO WE COLLECT YOUR PERSONAL DATA?

- Data is submitted by the whistleblower through the whistleblowing channels.
- Data is collected during the investigation.

HOW LONG WE WILL RETAIN YOUR PERSONAL DATA?

We will process your personal data collected during the Whistleblowing procedure no longer than 5 years unless longer storage of personal data and related documents will be required by applicable laws, legal regulations, or

institutional/state authorities, or will be necessary for the judicial process. We ensure and take all necessary measures to avoid storing outdated or unnecessary personal data about you.

TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

We as the coordinator of the whistleblower channel groupwide may share the report including your personal data on the joint controllership of personal data basis with our subsidiary involved for the investigation purposes. In no event your personal data shall be disclosed to anyone beyond the authorized staff members competent to receive or follow up on the reports.

Your identity and any other information from which your identity may be directly or indirectly deduced may be disclosed only where this is a necessary and proportionate obligation imposed by European Union or national law in the context of investigations by national authorities or judicial proceedings, including with a view to safeguarding the rights of defense of the person concerned.

We will send you the explanation in writing of the reasons for the upcoming disclosure pursuant to the derogation described above unless such information would jeopardize the related investigations or judicial proceedings.

Other persons (suspected of wrongdoing, persons who have participated or could have been involved in committing the Infringement, witnesses) may be given the opportunity to comment on the information from the whistleblowing report. In this case, we guarantee the anonymity of a whistleblower, or any other person concerned – to the extent applicable laws so permit.

WHAT DATA SUBJECT'S RIGHTS DO WE GUARANTEE TO YOU?

We guarantee the implementation of these rights and the provision of any related information at your request or in case of your query:

- know (be informed) about the processing of your personal data;
- to get access to your personal data which are processed by us;
- request correction or addition, adjustment of your inaccurate, incomplete personal data;
- require the destruction of personal data when they are no longer necessary for the purposes for which they were collected;
- request the destruction of personal data if they are processed illegally;
- disagree (object) with the processing of personal data;
- request to provide, if technically possible, your personal data in an easily readable format or request the transfer of data to another data controller.

To learn more about how we process personal data, and your rights please refer to our Privacy Policy at <https://aviasg.com/en/policies/privacy-policy>.

If you have any questions regarding the Whistleblowing Policy, please contact risks@aviasg.com.

ⁱ **AVIA SOLUTIONS GROUP PLC**, a private limited liability company, established and acting under the laws of the Republic of Cyprus, registration code HE 380586, registration address 117 Arch. Makariou Ave., 5th Floor, Office 505, 3021 Limassol, Cyprus