

Internal Reporting Regulations

defining procedures for reporting violations/irregularities, taking follow-up actions and protecting people reporting violations of the law (whistleblowers)

INTRODUCTION

The purpose of these Regulations is to introduce procedures for reporting violations of the law in accordance with Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting violations of Union law (hereinafter: Directive) and the Act of 14 June 2024 on the protection of whistleblowers at **TPV Displays Polska Sp. z o.o.** with its registered office in Gorzów Wlkp. (hereinafter referred to as the Company). The Regulations specify procedures for reporting and considering reports of violations of the law, taking follow-up actions and ensuring protection of persons reporting violations of the law against retaliatory actions.

ARTICLE 1

DEFINITIONS

The terms used in these Regulations mean:

1. **whistleblower** - a natural person who reports or publicly discloses information about a violation of the law obtained in a work-related context;
2. **follow-up action** - shall mean any action taken by the employer or a public authority to assess the veracity of the allegations contained in a whistleblowing claim and, where appropriate, to address the reported infringement, including an internal investigation, a criminal prosecution, an action taken to recover funds, or the closing of a collection procedure and verification of whistleblowing claims;
2. **follow-up action** – this should be understood as action taken by a legal entity or a public authority in order to assess the truthfulness of the information contained in the report and in order to counteract the violation of law that is the subject of the report, in particular through explanatory

proceedings, initiation of an inspection or administrative proceedings, bringing charges, action taken to recover funds or closing the procedure carried out as part of the internal procedure for reporting violations of law and taking follow-up action or the procedure for receiving external reports and taking follow-up action;

3. **retaliatory action** – shall mean a direct or indirect act or omission that is caused by a whistleblowing claim or public disclosure and which infringes or is likely to infringe the rights of the whistleblower or causes or is likely to cause harm to the whistleblower;
4. **information on infringement** – shall mean information, including reasonable suspicion, relating to an actual or potential legal infringement that has occurred or is likely to occur in the organisation where the whistleblower works or has worked, or in another organisation with which the whistleblower has or has had contact in a work-related context, or relating to an attempt to conceal such an infringement;
5. **feedback** – shall mean the provision of information to the whistleblower on the follow-up actions planned or taken and the reasons for such actions;
6. **work-related context** – shall be understood as all circumstances related to the employment relationship or other legal relationship constituting the basis for the provision of work, within the framework of which information on the infringement of the law was obtained;
7. **public authority** – it should be understood as a public administration body that has established a procedure for accepting external reports of violations of the law in the field falling within the scope of that body;
8. **person to whom the whistleblowing claim relates** – shall be understood as a natural person, a legal person or an organisational unit without legal personality, to which legal capacity is granted by law, indicated in the whistleblowing claim or public disclosure as a person who committed the infringement of the law or with whom the person is connected;
9. **person assisting in making a whistleblowing claim** – means a natural person who assists the whistleblower in making a whistleblowing claim or public disclosure in a work-related context;
10. **person associated with the whistleblower** – means an individual who may experience retaliation, including a co-worker or family member of the whistleblower;
11. **employer** – shall mean the Company on behalf of which the President of the Management Board acts;

12. **employee** – shall mean an employee employed by the Company regardless of the type of employment contract;
13. **public disclosure** – shall be understood as providing information about the violation of the right to the public;
14. **whistleblowing claim** – shall be understood as an internal whistleblowing claim or external whistleblowing claim;
15. **internal whistleblowing claim** – shall be understood as transmission of information of the employer's infringement;
16. **external whistleblowing claim** – shall mean the transmission of information about the infringement to a public authority or a central authority;
17. **person accepting reports** – internal entity operating within the employer and authorised by it to receive, investigate, follow up and provide feedback to the whistleblower;
18. **directive** – DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (EU) 2019/1937 of 23 October 2019 on the protection of whistleblowers of Union law;
19. **regulations** – this document;

ARTICLE 2

GENERAL PROVISIONS

1. A violation of the law is an act or omission that is unlawful or is intended to circumvent the law regulated in the Act, concerning:
 - a) corruption;
 - b) public procurement;
 - c) services, products and financial markets;
 - d) counteracting money laundering and terrorism financing;
 - e) product safety and compliance with requirements;

- f) transport safety;
- g) environmental protection;
- h) radiological protection and nuclear safety;
- i) food and feed safety;
- j) animal health and welfare;
- k) public health;
- l) consumer protection;
- m) protection of privacy and personal data;
- n) security of networks and IT systems;
- o) financial interests of the State Treasury of the Republic of Poland, local government units and the European Union;
- p) the internal market of the European Union, including public law principles of competition and state aid and taxation of legal persons;
- q) constitutional freedoms and rights of persons and citizens – occurring in the relations of an individual with public authorities and not related to the areas indicated in points a–p.2.

2. The employer and all employees, regardless of the form of work and type of contract, regardless of the position held and type of employment related to work, i.e. in particular:

- a) employee;
- b) temporary employee;
- c) person performing work on a basis other than an employment relationship, including a civil law contract;
- d) entrepreneur;
- e) proxy;
- f) shareholder or partner;
- g) member of the body of a legal person or an organizational unit without legal personality;
- h) person performing work under the supervision and management of a contractor, subcontractor or supplier;
- i) intern;
- j) volunteer;

- k) trainee;
- l) officer within the meaning of Art. 1 sec. 1 of the Act on the pension provision of officers of the Police, Internal Security Agency, Intelligence Agency, Military Counterintelligence Service, Military Intelligence Service, Central Anticorruption Bureau, Border Guard, Marshal's Guard, State Protection Service, State Fire Service, Customs and Fiscal Service and Prison Service and their families
- m) soldiers

should strive to properly perform their official duties in accordance with applicable law and to counteract and eliminate any irregularities, including abuse of law within the scope of the subject matter described in the provisions of the Act and the provisions of the Regulations.

3. Any intentional actions or behaviors or omissions leading to irregularities in the application and observance of the law will not be tolerated by the employer.
4. All reports will be scrupulously investigated, and any irregularities revealed will be explained and eliminated.
5. All persons referred to in §2 point 2 are obliged to familiarize themselves with the content of these Regulations, which are posted on the notice board.
6. Newly employed persons will be familiarized with the content of these Regulations, which will be documented by a written statement of the employee. The template of the statement constitutes Annex No. 1 to these Regulations.
7. All persons referred to in §2 point 2, regardless of the type of work performed, type of employment and position held and the location in which they perform professional activities, are protected by these Regulations on the principles described therein.
8. The following persons also benefit from protection against retaliatory actions:
 - a) persons helping to make a report,
 - b) other persons associated with the reporting persons who may experience retaliatory actions in a work-related context, such as co-workers or relatives of whistleblowers,
9. The Regulations do not apply to:

- a) information covered by the provisions on the protection of classified information and other information that is not subject to disclosure under the provisions of generally applicable law for reasons of public safety;
- b) information covered by the professional secrecy of medical and legal professions;
- c) information covered by the secrecy of a judge's deliberation;
- d) information covered by criminal proceedings - within the scope of the secrecy of preparatory proceedings and the secrecy of a court hearing conducted in camera.
- e) to violations of the law in the scope of procurement in the fields of defence and security within the meaning of Art. 7 point 36 of the Act of 11 September 2019 - Public Procurement Law, offset agreements concluded on the basis of the Act of 26 June 2014 on certain agreements concluded in connection with the implementation of orders of fundamental importance for security and other measures taken to protect the fundamental or essential interests of state security on the basis of Article 346 of the Treaty on the Functioning of the European Union.

10. If the notification is subject to consideration under another procedure (e.g. anti-mobbing, complaint), it is forwarded according to the competence.

ARTICLE 3

INTERNAL REPORTING PROCEDURE

1. All persons referred to in article 2 item 2 are entitled to submit internal reports containing information on violations of the law.
2. Internal reports are submitted to the Internal Reporting Representative appointed by the Employer.
3. The procedure specified in these Regulations does not include receiving reports of violations of employee duties subject to liability provided for in the Labor Code or the Employer's internal documents regulating labor relations.
4. The Regulations also do not apply to cases excluded from the scope of the Act.

5. Reports of violations may be submitted:

- a) by e-mail to the address: komunikat@tpv-tech.com
- b) in person, orally to the report protocol, which will be prepared by the person authorized to receive the report during a meeting arranged within 7 days from the date of receipt of the report;
- c) by phone, orally - by calling 697 250 081

6. For reports other than in written form, the Internal Reporting Representative prepares a written note containing the content of the report and the data of the reporting person.

7. The report from a report made during a personal meeting may be inspected by the reporting person and may approve its content by signing the report.

8. Reports may also be submitted anonymously.

9. The report should include in particular:

- a) personal data of the reporting person: first name, last name, position, place of work - in the case of a non-anonymous report;
- b) date of the report;
- c) personal data of the person/persons to whom the report relates;
- d) description of the subject of the violation, indication of irregularities and their dates;
- e) indication of which internal regulations, legal provisions or standards the report concerns;
- f) indication of the circumstances of obtaining information about the violation;
- g) indication of persons connected with the case or possible witnesses;
- h) indication of the persons with whom the reporting person contacted in a given case; i) other circumstances relevant to the case.

ARTICLE 4

INTERNAL REPORTING REPRESENTATIVE

1. The Employer appoints Magdalena Rzeczycka-Więckowska as the Internal Reporting Representative and Magdalena Najdek to perform the above function as a replacement during the absence of the aforementioned Representative.
2. In the event that the Internal Reporting Representative is, in particular:
 - a) the person to whom the report relates;
 - b) a person who is a direct subordinate or superior of the person to whom the report relates;
 - c) a person close to the person to whom the report relates (within the meaning of the provisions of the Penal Code);
 - d) a person performing activities or handling matters whose correctness will be the subject of the examination (this may be a person performing activities or handling matters of this type);
 - e) a person whose participation in the proceedings would raise justified doubts as to their impartiality for other reasons, then the role of the Internal Reporting Representative will be performed by Magdalena Najdek,
3. The Internal Reporting Representative shall submit a Statement on the lack of grounds for exclusion from work. The Declaration Form is attached as Annex 3 to these Regulations.
4. The Internal Reporting Representative shall perform their duties at the Employer's registered office and during working hours.
5. If, during the explanatory proceedings, it is necessary to use specialist knowledge (expert, expert), the Employer may appoint such a person to participate in the work of the Internal Reporting Representative, provided that the agreement concluded with this person contains a confidentiality clause and a personal data protection clause.
6. During the explanatory proceedings, the Internal Reporting Representative has the right to:
 - a) access the unit's documents and data to the extent necessary to clarify the matter;

- b) obtain information from managers of individual organizational units;
- c) obtain oral and written explanations from employees and contractors of the unit;
- d) access data from the unit's official computers and telephones [taking into account the principles of privacy protection, secrecy of correspondence and GDPR];
- e) access to data from video monitoring [taking into account the principles of privacy protection and GDPR];
- f) access to the premises of the unit in order to conduct an on-site inspection or search and secure evidence;
- g) use the assistance of the management representative for personal data protection;
- h) consult, to the extent necessary, the information and data obtained with the reporting party.

7. The tasks of the Internal Reporting Representative include:

- a) receiving internal reports,
- b) taking follow-up actions, including verification of the report and further communication with the reporting party, including requesting additional information and providing feedback to the reporting party,
- c) confirming receipt of the report to the reporting party within 7 days of its receipt, unless the reporting party did not provide an address to which the confirmation should be sent, the confirmation template is in Annex No. 7
- d) taking, with due diligence, follow-up actions in connection with the internal report.
- e) maintaining a register of reports
- f) familiarizing the person reporting the violation with the information clause and the rights resulting from the applicable regulations;

8. Based on the findings made during the explanatory proceedings, the Internal Reporting Representative shall prepare a final report, which shall be submitted to the Employer. This report shall contain a description of the established factual circumstances, including the established irregularities and their causes, the scope and effects of the irregularities and the persons responsible for them.

9. Together with the final report, the Internal Reporting Representative shall attach proposals for further actions, which may include in particular:

- a) closing the procedure without taking further action (in the event of the report not being confirmed);
- b) conducting a conversation, drawing the employee's attention;
- c) admonishing the employee, depriving them of an award, bonus, etc.;
- d) changes or rotations in positions;
- e) preventive applications of a managerial or organizational nature;
- f) changes in internal procedures;
- g) taking civil law actions, e.g. concerning concluded contracts, redressing damages, paying compensation;
- h) submitting a motion to initiate disciplinary proceedings;
- i) submitting a motion to initiate proceedings concerning a breach of public finance discipline;
- j) filing a notification to the Office of Competition and Consumer Protection;
- k) filing a notification of a justified suspicion of a crime (in the event of evidence collection),
- l) informing the relevant services (in the event of insufficient evidence collection).

10. The Internal Reporting Representative is obliged to provide the reporting party with feedback within 3 months of confirmation of receipt of the report or, in the event of failure to provide confirmation to the reporting party, 3 months after the expiry of 7 days from the date of reporting. The information template is provided in Annex 8.

ARTICLE 5

PERSONAL DATA PROTECTION

1. The personal data of the reporting person and other data allowing for the identification of their identity shall not be disclosed, unless with the express consent of the reporting person.
2. After receiving the report, the Internal Reporting Representative may, for the purpose of verifying the report and taking follow-up action, collect and process the personal data of the person concerned by the report, even without their consent.
3. The Internal Reporting Representative shall keep a register of internal reports. The Register template constitutes Annex No. 2 to the Regulations.
4. The employer is the administrator of the data collected in the internal report register.
5. The data in the internal report register are stored for a period of 5 years from the date of receipt of the report.
6. Only the Internal Reporting Representative and the Employer are authorized to receive and verify reports, take follow-up action and process the personal data of persons making reports and persons concerned by the report, to the extent specified in these Regulations and the Act.
7. The Employer authorizes the Internal Reporting Representative in writing to perform the activities indicated in paragraph 6. The authorization form is attached as Appendix 3 to the Regulations.
8. Persons authorized in accordance with paragraph 7 are obligated to maintain confidentiality. The declaration of confidentiality is attached as Appendix 4 to the Regulations.
9. Personal data that is clearly irrelevant to the consideration of a specific report is not collected, and in the event of accidental collection, is deleted without undue delay.
10. The information clause is attached as Appendix 5 to the Regulations.
11. The information clause will be handed out by the Internal Reporting Representative in the case of direct reporting, sent by traditional mail (with confirmation of receipt) or by e-mail in the case of a written report sent by traditional mail or electronically, and also delivered to persons whose data was obtained from the reporting person.

ARTICLE 6

CONFIDENTIALITY PRINCIPLE

1. Proceedings conducted by the Internal Reporting Representative are subject to the obligation to maintain confidentiality regarding all information disclosed during their course.
2. Each person participating in the above proceedings is obliged to maintain confidentiality, of which they are informed each time.
3. The Internal Reporting Representative, the parties to the proceedings and witnesses sign a declaration of confidentiality, the template of which constitutes Annex No. 4 to the Regulations.
4. None of the employees participating in the proceedings conducted by the Internal Reporting Representative is authorized to disclose information about the fact, place, time and course of meetings organized as part of these proceedings. The above obligation applies to information contained in the maintained register of reports.
5. The content of the report submitted to the Internal Reporting Representative and the data of the employee submitting it are subject to confidentiality, which means that they are not made available to other employees or direct or higher-level superiors.

ARTICLE 7

PROHIBITION OF RETALIATION

1. No person who uses the instruments provided for in these Regulations and other legal provisions may encounter the intention of retaliatory action or retaliation on the part of the Company or other employees and employed persons. This also applies to persons who appear in any proceedings as a witness or who report to the employer or other bodies provided for by law, noticed irregularities or provide support in this respect to reporting persons.

2. The prohibition of retaliatory actions covers both the protection of persons making the report, persons helping them to make the report, and persons associated with the reporting person.
3. Any action consisting in making a report in bad faith, having the nature of consciously accusing anyone of violating the law is prohibited and will be met with an adequate and proportionate reaction from the employer.
4. The employer does not cooperate with persons with whom it has previously terminated cooperation as a result of finding violations of the law and/or finding retaliatory actions and with persons whose conduct or actions were the basis for a final judgment ruling on the use of retaliatory actions in relation to persons reporting violations, and in particular does not enter into an employment relationship, does not conclude contracts of mandate, contracts for specific work, management contracts.
5. The reporting person is subject to protection, provided that he or she had reasonable grounds to believe that the information on the violation of the law that was the subject of the internal, external or public disclosure report was true at the time of making the report or public disclosure and that such information constitutes information on the violation of the law.
6. If the work is performed on the basis of an employment relationship, the reporting person may not be treated unfavourably because of the reporting or public disclosure.
7. The unfavourable treatment referred to in paragraph 6, in particular:
 - a) refusal to enter into an employment relationship,
 - b) termination or termination without notice of an employment relationship,
 - c) failure to conclude a fixed-term employment contract after termination of a trial period employment contract, failure to conclude another fixed-term employment contract or failure to conclude an employment contract for an indefinite period after termination of a fixed-term employment contract – in a situation where the employee had a justified expectation that such a contract would be concluded with him,
 - d) reduction of remuneration for work,
 - e) suspension of promotion or omission in promotion,
 - f) omission in the granting of benefits related to work other than remuneration,

- g) transfer of the employee to a lower job position,
- h) suspension from the performance of employment or service duties,
- i) transfer of previous employment duties to another employee,
- j) unfavourable change of the place of work or work schedule,
- k) negative assessment of work results or negative opinion on work,
- l) imposition or application of a disciplinary measure, including a financial penalty, or a measure of a similar nature,
- m) suspension of participation or omission when selecting for participation in training to improve professional qualifications,
- n) unjustified referral for a medical examination, including psychiatric examinations, if separate provisions provide for the possibility of referring an employee for such an examination,
- o) action aimed at making it difficult to find employment in a given sector or industry in the future on the basis of an informal or formal sectoral or industry agreement, unless the employer proves that he or she was guided by objective reasons.

8. A threat or attempt to apply the measure specified in par. 7 is also considered unfavorable treatment due to making a report or public disclosure, unless the employer proves that he or she was guided by objective reasons.

9. If the work is or is to be performed on the basis of a legal relationship other than an employment relationship, the reporting person cannot be treated unfavorably because of making a report or public disclosure.

10. Making a report or public disclosure cannot constitute grounds for disciplinary liability, provided that the reporting person had reasonable grounds to believe that the report or public disclosure is necessary to reveal a violation of the law.

11. Making a report or public disclosure cannot constitute a basis for liability, including liability for damage, for violating the rights of other persons or obligations specified in the law, in particular in the matter of defamation, infringement of personal rights, copyrights, provisions on the protection of personal data and the obligation to maintain secrecy, including business secrets, provided that the reporting party had reasonable grounds to believe that the report or public disclosure is necessary to disclose the violation of the law.

12. Termination or dissolution without notice of a contract in business transactions to which the reporting party is a party, in particular concerning the sale or delivery of goods or the provision of services, due to making a report or public disclosure is ineffective.

ARTICLE 8

PROHIBITION OF UNBASED REPORTS

1. It is prohibited to make a report or public disclosure knowing that no violation has occurred.
2. In the event of making a report or public disclosure knowing that no violation has occurred, the reporting person does not benefit from the protection afforded to a whistleblower;
3. Whoever makes a report or public disclosure knowing that no violation has occurred shall be subject to a fine, a penalty of restriction of liberty or a penalty of imprisonment for up to 2 years.
4. A person who has suffered damage due to the conscious reporting or public disclosure of false information by a whistleblower shall have the right to compensation or redress for the violation of personal rights from the whistleblower who made such a report or public disclosure.

ARTICLE 9

INFORMATION ON THE PROCEDURE FOR EXTERNAL REPORTING

1. An external report is the provision of information about a violation of the law to a public body or the Commissioner for Human Rights.
2. External reports may be anonymous or allow for the identification of the reporting party.
3. The administrator of the data provided in the external report is the Commissioner for Human Rights or the public body receiving the external report.

4. An external report may be made orally or in paper or electronic form.
5. An oral report may be made:
 - a) by telephone using a recorded hotline;
 - b) at the request of the reporting party - during a direct meeting organized at the headquarters of the body receiving the report within a specified period, no longer than 7 days, counted from the date of submission of the request
6. The Commissioner for Human Rights or the public body receiving the external report shall confirm its receipt to the reporting party at the contact address immediately, but no later than within 7 working days from the date of receipt of the report, provided that the reporting party has provided a contact address.
7. The public authority shall take follow-up action by:
 - a) verifying the external report and assessing the veracity of the allegations contained in the report;
 - b) forwarding the external report to another public authority competent in the scope of the breach contained in the external report.
8. The public authority may request the reporting party to provide clarifications or additional information regarding the information provided that may be in its possession, using the contact address. If the reporting party objects to the transmission of the requested clarifications or additional information or if the transmission of such requests may jeopardise the protection of the identity of that person, the public authority shall waive the request for clarifications or additional information.
9. The public authority shall provide the reporting party with feedback within a period not exceeding 3 months from the date of confirmation of receipt of the report, and in particularly justified cases – within 6 months from that date.
10. The feedback shall be provided to the contact address, and in the case of external reports submitted in the form of an electronic document – via the IT system.

ARTICLE 10

FINAL PROVISIONS

1. In matters not regulated by these Regulations, the provisions of the Act shall apply.
2. The Regulations shall enter into force after 2 weeks from the date of their announcement to employees in the manner adopted by the Employer - posting on the notice board.

**STATEMENT OF KNOWLEDGE OF THE RULES ON REPORTING
INFRINGEMENTS**

I, the undersigned
(first and last name, ID)

employed at/providing services to
.....
(job title)

in **TPV Displays Polska Spółka z ograniczoną odpowiedzialnością**

hereby declare that I am aware of the Terms and Conditions for Reporting
Infringements
in **TPV Displays Polska Spółka z ograniczoną odpowiedzialnością** and I accept
it.

....., on
(signature)

Appendix No 2 to the Regulations for reporting violations

INTERNAL NOTIFICATION REGISTER

AUTHORIZATION TO PROCESS PERSONAL DATA

I authorize and recommend to you Mr./Mrs.....
PESEL.....

processing of personal data (including special categories of data) of persons appearing as parties and witnesses at the meetings of the Internal Reporting Representative and documents containing personal data indicated in the report or obtained during its consideration in accordance with Article 29 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) and repealing Directive 95/46/EC (General Data Protection Regulation). The authorisation expires upon termination of participation in the work of the team.

.....
Personal Data Administrator

I declare that I accept the above order

CONFIDENTIALITY STATEMENT

In connection with participation as a party, witness in the proceedings/member of the Internal Reporting Representative at TPV Displays Polska Sp. z.o.o with its registered office in Gorzów Wlkp. in the explanatory proceedings related to the internal report of a violation of the law, I undertake:

1. Irrevocably and unconditionally to keep confidential information within the meaning of this statement strictly confidential and undertakes to treat it and protect it from disclosure to third parties. Confidential information should be understood as any information (including information provided or obtained in oral, written, electronic and any other form) resulting from and related to the work of the Internal Reporting Representative, obtained in the course of work during meetings, sessions, regardless of whether it was made available in connection with the work or was obtained on this occasion in another way.
2. Not to disclose, not to make public, not to transfer or in any other way make available to third parties and not to use any confidential information.
3. In case of doubt as to whether specific information constitutes a secret, contact the Chairman of the team accepting applications in writing.
4. Assume full liability for any damage caused by actions or omissions constituting a breach of the obligations arising from this declaration.
5. Maintain the confidentiality referred to in this declaration indefinitely.

.....

Date and signature of the person submitting the declaration

GDPR information obligation for persons reporting violations of the law through an internal channel

Pursuant to Article 13 of the General Data Protection Regulation of 27 April 2016, hereinafter referred to as "GDPR", (Dz. Urz. EU L 119 of 04.05.2016) we inform you that:

1. The Administrator of your personal data is TPV Displays Polska Sp. z o. o. with its registered office in Gorzów Wielkopolski at ul. Złotego Smoka 9 (66-400) KRS number: 0000279792, NIP: 5993005228, hereinafter referred to as the Administrator.
2. You can contact the Administrator of personal data by writing to the e-mail address: joris.wouters@tpv-tech.com or to the registered office address indicated above;
3. The personal data of persons reporting a violation of the law by disclosing their identity, persons assisting in making the report and persons to whom the violation is reported are processed for the purpose of verification and consideration of the report, and the legal basis for processing is art. 6 sec. 1 letter c) of the GDPR, i.e. a legal obligation incumbent on the administrator or art. 6 sec. 1 letter f) of the GDPR, i.e. the legitimate interest of the administrator.
4. The data referred to in point 3 will also be processed for the purpose of establishing, pursuing or defending against claims, and the legal basis for such processing is Article 6 paragraph 1 letter f) of the GDPR, i.e. the legitimate interest of the controller.
5. During the verification of the notification, special category data may be processed, whereby the legal basis for such processing is its necessity for reasons related to important public interest, based on Union law or Member State law, which are proportionate to the purpose pursued, do not violate the essence of the right to data protection and provide for appropriate and specific measures to protect the fundamental rights and interests of the data subject, i.e. Article 9 paragraph 2 letter g) of the GDPR.
6. Personal data processed as part of the procedure for reporting violations of the law will be processed for a period of no longer than 3 years from the end of the calendar year in which the follow-up actions were completed or after the completion of the

proceedings initiated by these actions. Personal data processed for the purpose of establishing, pursuing or defending against claims will be processed for a period in which the administrator is able to document the existence of such an interest and demonstrate the superior nature of its legal interest over the interests or fundamental rights and freedoms of the data subjects, but no longer than 6 years from the date on which a potential claim by the administrator or data subjects became due.

7. Persons whose data are processed by the administrator as part of considering a notification of an infringement have the right to request access to their personal data at any time, to rectify them and to lodge a complaint with the President of the Personal Data Protection Office if they consider that the processing of their personal data violates the provisions of the GDPR.

8. The administrator does not plan to share personal data processed as part of the procedure for reporting infringements of the law with other recipients within the meaning of art. 4 point 9) of the GDPR.

9. The source of data processed as part of considering a report of a violation of law may be the person making the report, and his or her identity is subject to legal protection and is not subject to disclosure, unless the reporting party had no reasonable grounds to believe that the information on violations that was the subject of the report was true at the time of making the report and that such information constitutes information on a violation of law.

10. Personal data processed by the controller as part of considering a report of a violation will not be subject to automated decision-making, including profiling.

11. Personal data will not be transferred outside the European Economic Area.

Confirmation of receipt of application

I hereby acknowledge receipt of the infringement notification, which was made by (name and surname of the applicant) on

concerning a violation of law consisting in:

.....
.....
.....

(reporting category or short description of the breach)

At the same time, I would like to inform you that your application has been registered under the number [notification number].

Please refer to the TPV Displays Polska Sp. z o.o. Internal Notification Procedure.

In accordance with the applicable Internal Reporting Procedure, we are beginning the verification phase of the report. Please be patient as it may take some time to verify and analyze the facts provided in the report. We assure you that we will take all necessary steps to thoroughly and fairly investigate the report.

.....
Signature of the Infringement Coordinator

Appendix No. 8 to the Regulations for reporting violations

....., on

Ms./Mr.:

[name, surname]

[contact details]

FEEDBACK

Dear Sir/Madam,

in relation to your notification of (date of notification), registered under number (notification number), which concerned (short description of the subject of the notification),

We inform:

- 1) your application has been found compliant/non-compliant with our Internal Application Procedure dated.....(date of procedure adoption) *
- 2) after investigation, we conclude that the report concerned a violation of the law /the report did not concern a violation of the law or was not directly related to the context of work in our company *

(if the answer is negative, please justify):

.....
.....

After detailed verification and analysis of the information contained in the notification, we have confirmed that a violation.....(description), has occurred/we have not found sufficient evidence to confirm the violation* (justification).

The following follow-up activities were carried out as part of the investigation:

..... (description of actions taken, activities carried out or scope of the audit).

Please be assured that we have taken all possible measures to ensure the protection of your identity and to protect you from retaliation and any other negative consequences in connection with your report.

Please be advised that the investigation has been/will continue until all circumstances are finally clarified. In this regard, you will be kept regularly informed of all key findings*. As a consequence of the confirmation of the breach, the following corrective actions were taken:

.....
.....
(description)

Thank you for your commitment and your decision to apply.
Please do not hesitate to contact us if you have any questions or concerns.

.....
(signature)