

PRIVACY POLICY NOTICE FOR WHISTLEBLOWING

Dear Whistleblowers,

We know that you care how data about you and possible infringements reported by you is used and shared and we appreciate your trust in us to do that carefully and sensibly. This Privacy policy notice for Whistleblowers (“Privacy Policy”) describes how we collect and process your personal information within procedure of receipt and assessment of the reports and acceptance of relevant remedies, if applicable.

Personal data is information that relates to an individual who can be identified from that information, whether or not in conjunction with any other information.

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[Who is the Data Controller?](#)

In case of use of Whistleblowing Global Alert Line Channel the data controller will be jointly Yokohama TWS S.p.A. and its relevant affiliate or subsidiary in relation to which you have become aware of the possible infringement.

In case of use of Whistleblowing Local Alert Line Channel the data controller will be the relevant Yokohama TWS Company in relation to which you have become aware of the possible infringement.

We determine how and why your personal data are processed. For contact details, please refer to the “**Questions and queries**” section below.

How and why do we process your personal data?

The personal data that we collect in connection with reports that you submit through the Global or Local solution and the basis of processing and the purposes of processing are detailed below.

Personal Data	Purpose of processing	Basis of processing
<p>Basic identification and contact details of the Whistleblower:</p> <ul style="list-style-type: none"> name and surname, date of birth, contact details, other information from which the identity of the Whistleblower can be inferred. <p>Data related to the report:</p> <ul style="list-style-type: none"> details of the receipt, assessment and handling of report, a summary of the content of the report, personal data of other persons mentioned in the report. 	<ul style="list-style-type: none"> Receipt and assessment of reports in accordance with applicable Data Privacy Laws, prevention of infringements, enforcement of laws and internal regulations. 	<ul style="list-style-type: none"> Fulfilling the legal obligations, legitimate interests in compliance with the laws and the prevention of infringements.

Where do we obtain your personal data from?

We obtain personal data primarily from the Whistleblower and other persons involved in the handling of the report or from systems or records maintained by us. We may also obtain it from publicly available sources, other persons or public authorities as part of the investigation of the report.

Do we share personal data with others?

The recipient of the personal data of the Whistleblower and other persons identified in the report/within investigation of the report is the competent person, Case Manager, who receives, registers, assesses and investigates individual report.

Personal data may also be disclosed to law enforcement authorities or other public authorities under the conditions provided by law.

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Information on the identity of the Whistleblower and other protected persons may be provided only with their written consent unless the person concerned is obliged to provide such information to the competent public authorities under the law. If the Case Manager provides information on the identity of the Whistleblower to a public authority, he/she shall inform the Whistleblower in advance, together with the reasons for which he/she is obliged to provide the information on the identity and give the Whistleblower the opportunity to comment on the provision of the information.

Do we transfer personal data to countries outside the EEA?

Personal data acquired in relation to Yokohama TWS company residing in European Economic Area are not transferred outside the European Economic Area.

How is your personal data secured?

We use modern security systems to ensure the confidentiality, integrity and availability of your personal data. We have adopted appropriate technical and organisational security measures against unlawful or unauthorised processing of personal data and against accidental loss or damage of personal data.

Access to your personal data is granted only to the Case Manager who receives, assesses, and investigates individual report.

How long do we store your personal data?

We will keep your personal data for as long as we need it to fulfil the purposes for which it was collected (see above), to protect our legitimate interests and to comply with our legal archiving obligations.

What are your rights under applicable Data Privacy Laws?

Under the stipulated conditions, you can exercise all of the rights listed below, which are granted to you by applicable Data Privacy Laws, in particular:

- right of access to personal data and the right of provision of further information on the processing of your personal data;
- right to rectification of inaccurate or incomplete personal data;
- right to obtain your personal data and transfer your data to another controller;
- right to object to the processing of your personal data;
- right to restriction of personal data processing;
- right to erasure of personal data;
- right to withdraw provided consent with processing;
- right to a complaint with the competent supervisory authority, if applicable (a list of supervisory authorities in the EEA can be accessed [here](#)).

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In case of any queries or requests regarding your rights, please contact us (see “Questions and queries” below).

Questions and queries

If you are interested in detailed information about your rights in the area of personal data protection, including the right of access and rectification of inaccurate data, or any other query or complaint to personal data processing, please contact us by post, personally, telephone or e-mail.

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Changes to this Notice

We may decide to change or update this Privacy Policy. The actual wording will always be available on <https://www.yokohama-tws.com/en/whistleblowing>.