



## Conduct Watch Platform | Privacy Notice

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### 1. What is the purpose of this document?

“Deloitte Business Solutions Societe Anonyme of Business Consultants” (hereinafter “Deloitte”, “we”, “us” or the “Firm”) is committed to protecting your privacy and processing your data in a clear and transparent manner. Deloitte, in connection with the provision of independent whistleblowing services (hereinafter the “Services”) to its clients via the Whistleblowing Conduct Watch Platform (hereinafter “Conduct Watch” or the “Platform”), may process your personal data either as a data processor or as a data controller, depending on the specific circumstances.

When processing personal data on behalf of its clients (your employer, client, business partner or other business relationship), who act as data controllers, Deloitte acts as a data processor and processes personal data strictly in accordance with the documented instructions of the client for the management of whistleblowing cases under the provisions of Greek Law 4990/2022, as applicable, and Directive (EU) 2019/1937 of the European Parliament and European Council on the protection of persons who report breaches of Union Law. When processing personal data for user authentication, authorization and technical support related to the operation and security of the Platform, Deloitte acts as a data controller.

This privacy notice describes the processing of your personal data while providing the aforementioned Services to our clients, in accordance with the General Data Protection Regulation (GDPR), national law 4624/2019, as in force, and all the applicable data protection laws and regulations. It provides information on the nature of the personal data processed - where personal data means any information relating to an identified or identifiable natural person (“data subject”), the purposes of the processing and indicates your rights in relation to the data processed and who to contact for further information or to send any requests.

### 2. Which data do we process about you and for which purposes?

The personal data typically processed during the provision of the abovementioned Services, may be categorized as follows:

- Personal data provided in the submitted report(s), including any follow-up communications that may take place during the whistleblowing process, for instance, data that may be included in the description of the incident, the names and other identification details of the person to whom the breach is attributed or with whom that person is associated, names and other identification details of witnesses or any other involved persons, if any;
- Personal data included in the supporting material/documentation of the internal report, if any;
- In case of non-anonymous reports, identification data of the reporting person (yourself) ;
- In case the voice messaging system reporting feature is activated, voice data;
- Digital footprint data (IP address, browser type & language and access time to the application). It is highlighted though that these data will be used solely for technically establishing a secure communication channel and will not be processed in the Platform, hence the identification (directly or indirectly) of the reporting person will not be possible;
- Personal data required to authenticate and authorize users into Conduct Watch platform, as well as audit logs

(applicable only to client's authorized persons to access the Platform, e.g., admins).

Kindly note that due to the nature of the Services (i.e., the nature of some reports that may be submitted in the Platform), special categories of personal data may be processed as well.

Sources of the personal data collected are the reporting person (yourself) and potentially any other person that may be involved in the course of an investigation (if any).

When we process personal information through Conduct Watch Platform in the context of providing whistleblowing services to our clients (data controllers), the specified purpose(s) of the processing of your personal data are determined by the data controller and the processing is carried out by Deloitte, on behalf of the data controller, only according to the documented instructions received by the latter.

Personal data for authentication and authorization as well as audit logs are processed by Deloitte in its capacity as data controller, for the purposes of authenticating and authorizing admins' access to the Platform, as well as for technical support purposes related to the operation and security of the Platform.

In addition, when you use the Platform, strictly necessary cookies and similar technologies to operate the application are used. Additional information on how cookies are used can be found in the Cookies Notice, which is always available to you in the footer section of the Platform.

### 3. What is the legal basis on which your personal data is being processed?

When Deloitte acts as data processor, the legal basis for the processing of your personal data is determined by the data controller. Should you have any questions about the legal basis for the processing of your personal data, please directly contact the data controller. The basis for processing of your personal data may include compliance with the data controller's legal obligation arising out of Law 4990/2022, as applicable and in particular the obligation to operate internal reporting channels and to take the necessary measures for the follow-up on the reports. Furthermore, according to law 4990/2022, the recording via the voice messaging system, when used for reporting, is subject to the consent of the reporting person (you).

It should be noted that Deloitte, in its capacity as the data processor, will carry out the processing strictly as per the instructions of the data controller, whilst ensuring that the processing will be reduced to the minimum and that every operation made will be done with the strictly necessary means for the purposes determined by the data controller, adopting any measure to mitigate or reduce the extent and impact of the data processing.

When Deloitte acts as data controller, the legal basis for the processing of personal data for authentication and authorization as well as audit logs, is the legitimate interest (Article 6(1)(f) GDPR) of Deloitte in ensuring secure authentication, authorization of users and the proper functioning and support of the Platform.

### 4. Who has access to your personal data and to whom is it disclosed?

Your personal data are disclosed, through the Platform, to the authorised personnel of our client and/or other appointed persons of our client. In addition, when it is necessary to fulfill one or more of the above defined purposes in the context of the provided Services, recipients of your personal data are entities that provide services to us and/or the Deloitte Network. Namely the following entities may have access to your personal data:

a. Deloitte Consultanță SRL (Deloitte Romania): authorized personnel may have access to the Platform only for administrative and bug fixing purposes and thus may have access to personal data strictly for the provision of technical support services to the users of the Platform.

b. Amazon Web Services (AWS) providing hosting services (IaaS) through data centers in Frankfurt, Germany.

In relation to the abovementioned service providers, it is noted that your personal data will not be transferred to countries outside the European Economic Area.

Kindly note that, we may be requested to further disclose your personal data if required to do so by law, a regulator or during legal proceedings.

## 5. What is the data retention period, or if not possible, the criteria used to determine it?

The retention period of your personal data is determined by our client unless further storage is required by applicable law. Thus, should you have any questions about how long your personal information is retained, please contact our client directly.

## 6. How do we protect and safeguard your personal data?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, processed, or accessed in an unauthorized way, altered, or disclosed. These measures can include:

- Education and training of our relevant staff to ensure they are aware of our privacy and data protection obligations when processing personal data;
- Administrative and technical controls to restrict access to personal data on a “need to know” basis;
- Technical security measures including, but not limited to: firewalls, encryption and anti-virus software;
- Physical security measures.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any incident that may lead to a security breach and will notify the controller and any applicable regulator of a suspected breach where we are legally required to do so. Third parties will only process your personal data on our instructions and only where they have agreed to treat the data confidentially and to keep it secure in compliance with the applicable law.

## 7. What are your rights and how can you exercise them?

In relation to the processing of your personal data, you have specific rights according to Art. 15 - 22 of the GDPR:

- **Access:** you can ask for confirmation as to whether or not a certain processing of data concerning you is in place, as well as further clarifications about the information referred to in this privacy notice;
- **Rectification:** you can ask to rectify or supplement the data you have provided to us, if inaccurate;
- **Erasure:** you can request that your data be deleted, if they are no longer necessary for our purposes, in case of withdrawal of consent or your opposition to the processing, in case of unlawful processing, or there is a legal obligation to erase them;
- **Restriction:** you can request that your data be processed only for the purpose of storage, with the exclusion of other processing activities, for the period necessary for the correction of your data, in case of unlawful processing for which you oppose the erasure, if you have to exercise your rights in court and the data stored by us may be useful to you and, finally, in the event of opposition to the processing and a review is in progress on the prevalence of our legitimate reasons over yours;

- **Object:** you can object at any time to the processing of your data, unless there are our legitimate reasons to proceed with the processing that prevail over yours, for example for the exercise or defence of our legal claims in court;
- **Withdrawal of consent:** you may revoke your consent at any time, in all cases where consent is the legal basis for processing. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.
- **Portability:** you can ask to receive your data, or to have them transmitted to another Data Controller indicated by you, in a structured format, commonly used and readable by automatic device.
- **Automated individual decision-making, including profiling:** you can request not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

**Should you wish to exercise any of your abovementioned rights in relation to the personal data that Deloitte may have processed on behalf of the data controller, please contact the data controller directly or Deloitte by sending an email to the following address: [DataPrivacyOfficer@deloitte.gr](mailto:DataPrivacyOfficer@deloitte.gr). The Firm would like to inform you that, even though we are committed to respecting your rights, we might not be able to respond directly to your requests and/ or inquiries. However, we will promptly forward any question, complaint and/or request to the data controller, as soon as possible and in any case within the contractually agreed upon timeframe, and we will make every possible effort to support the data controller in satisfying your rights, unless prohibited by law.**

Notwithstanding the foregoing, if you have any questions or complaints about the way we handle your personal information, you may contact the Firm's DPO by sending an email to the following address: [DataPrivacyOfficer@deloitte.gr](mailto:DataPrivacyOfficer@deloitte.gr). We will make every possible effort to resolve any issue, either independently, where permitted under our contract with the data controller, or by referring the request to the data controller.

You always have the right to file a complaint before the competent supervisory authority, which in Greece is the Hellenic Data Protection Authority (HDPA), by following the instructions found on the HDPA's [website](#).

## 8. Changes to this Privacy Notice

We may modify or amend this Privacy Notice from time to time at our discretion and we will promptly inform you through traditional channels of communication (e.g. by publishing the new information on the Platform). When we make changes to this notice, we will amend the revision date at the top of this page, and such modified or amended Privacy Notice will be effective from that revision date. We therefore invite you to regularly consult this Privacy Notice in order to stay up to date with any changes made since your last consultation.



This document has been prepared by Deloitte Business Solutions Societe Anonyme of Business Consultants, Deloitte Certified Public Accountants Societe Anonyme and Deloitte Alexander Competence Center Single Member Societe Anonyme of Business Consultants.

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