	IMS	CODE: F.29.02
	Whistleblowing Privacy Notice	VERSION: 01
AUTHOR: QUALITY AWARD	VERSION DATE: 05/06/2026	APPROVED BY: SMART NS

## WHISTLEBLOWING PRIVACY NOTICE

Last Update: 05/06/2026

### 1. Purpose

Smart NS is committed to maintaining the highest standards of integrity, transparency, and ethical conduct. This Privacy Notice explains how Smart NS processes personal data collected through the whistleblowing process and informs whistleblowers, reported persons, and other involved individuals about their rights.

This notice applies exclusively to personal data processed in connection with whistleblowing reports and investigations.

### 2. Data Controller

**Smart NS S.A.**

**Address:** Leoforos Mesogeion 392, Agia Paraskevi, Attiki, 15341, Athens, Greece

**Phone:** +30 2110135400

### 3. Purpose of Processing


Personal data may be processed for the following purposes:

- Receiving and managing whistleblowing reports.
- Investigating suspected violations.
- Conducting follow-up actions.
- Protecting whistleblowers from retaliation.
- Detecting and preventing bribery, corruption, fraud, and misconduct.
- Supporting disciplinary, administrative, civil, or criminal proceedings.
- Complying with legal and regulatory obligations.
- Protecting the legitimate interests of Smart NS.

### 4. Categories of Personal Data

Smart NS may process:

- Name, surname, email address, telephone number.
- Employment information.
- Information contained within a report.
- Evidence submitted in support of a report.
- Correspondence related to a report.

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- Information relating to alleged criminal offences where legally permitted.

Anonymous reports may also be submitted.

## 5. Legal Basis for Processing

Personal data is processed on the basis of:

- Compliance with legal obligations.
- Performance of tasks carried out in the public interest.
- Legitimate interests in preventing and detecting misconduct.
- Establishment, exercise, or defence of legal claims.

## 6. Recipients of Personal Data

Access is restricted on a strict need-to-know basis.

Data may be disclosed to:

- RAMR.
- Anti-Bribery Compliance Function.
- Investigation Committee members.
- Data Protection Officer.
- External legal advisors.
- Competent regulatory, judicial, or law enforcement authorities.

## 7. Confidentiality

Smart NS maintains strict confidentiality regarding the identity of whistleblowers and all persons involved.


Information revealing the identity of a whistleblower will not be disclosed without consent unless required by applicable law or judicial proceedings.

Appropriate technical and organizational safeguards are implemented to protect personal data from unauthorized access, disclosure, alteration, or destruction.

## 8. Retention Period

Reports and investigation files shall be retained for ten (10) years from closure of the case unless a longer retention period is required by law or ongoing legal proceedings.

Information unrelated to the investigation shall be deleted without undue delay.

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## 9. Rights of Data Subjects

Individuals may exercise the following rights, subject to legal limitations:

- Access and receive a copy of your data
- Request the rectification of your data
- Correct inaccurate or incomplete data
- Request erasure/deletion of your data
- Object to or request restriction of certain types of data processing, where permitted by law
- Withdraw consent at any time
- Request the transfer of your personal data to you or a third party
- File a complaint with a supervisory authority if you believe your data have been misused

Individuals have the right to exercise their rights of access, rectification, cancellation and opposition by contacting at [info@smartns.gr](mailto:info@smartns.gr). Smart NS may ask the individual to verify their identity before responding to such requests. If you make a request, Smart NS will respond as soon as possible.

## 10. Protection Against Retaliation

Smart NS strictly prohibits retaliation against any person who submits a report in good faith or participates in an investigation.

Any retaliation shall be treated as a serious disciplinary violation and may result in disciplinary action.

## 11. International Transfers

Where personal data is transferred outside the European Economic Area, Smart NS shall ensure appropriate safeguards are implemented in accordance with GDPR requirements.

## 12. Changes to this Whistleblowing Privacy Notice

We may update this Notice. Any changes will be posted on our website with an updated revision date.

## 13. CONTACT US

If you have any questions or concerns please feel free to contact us:

**Smart NS S.A.**

**Address:** Leoforos Mesogeion 392, Agia Paraskevi, Attiki, 15341, Athens, Greece

**Phone:** +30 2110135400

For privacy matters:

**Email:** [dpo@qualityaward.gr](mailto:dpo@qualityaward.gr)

For whistleblowing matters:

**Email:** [ramr@smartns.gr](mailto:ramr@smartns.gr)