

## **NOTICE ON THE PROCESSING OF PERSONAL DATA IN THE WHISTLEBLOWING PROCEDURE**

Synevo Hrvatska - poliklinika

This Notice on the Processing of Personal Data in the Whistleblowing Procedure (hereinafter: the "Notice") applies to the processing of personal data carried out by SYNEVO Hrvatska - poliklinika, Zagreb, Kraljevićeva ulica 24, OIB 27878391929 (hereinafter: "SYNEVO") of whistleblowers as defined by the Whistleblower Protection Act (Official Gazette, no. 46/22 and 136/25., hereinafter: the „Act“)

SYNEVO is a healthcare institution that is registered to provide health services, namely for medical biochemistry, internal medicine and microbiology with parasitology, and pathology and cytology. Since SYNEVO's primary activity is the provision of health services, SYNEVO acts as the controller of the personal data of its data subjects.

In this Notice, we describe who we are, what categories of personal data we process, how and for what purposes we process them, how we protect personal data and what rights data subjects have in relation to our processing of their personal data.

## **1. WHAT CATEGORIES OF PERSONAL DATA DOES SYNEVO COLLECT AND PROCESS?**

SYNEVO may collect the following categories of personal data, depending on the personal data provided by the whistleblower:

Identification data: name and surname of the whistleblower, telephone number, mobile phone number and email address of the whistleblower (unless the report was submitted anonymously), name and surname of the reported person and/or third parties listed in the report, and data relating to the reported person, to the extent permitted by applicable regulations on personal data protection and the Act.

Personal data that is not necessary for the procedure for reporting irregularities may not be collected, i.e., if they have been submitted by the whistleblower, they shall be deleted to the greatest extent possible.

## **2. FOR WHICH PURPOSES DOES SYNEVO PROCESS PERSONAL DATA?**

SYNEVO processes the personal data of data subjects in order to be able to carry out the reporting procedure in accordance with the applicable Act.

SYNEVO performs this processing because it is necessary for compliance with SYNEVO's legal obligations to carry out the whistleblowing procedure.

### **3. HOW LONG DOES SYNEVO KEEP THE PERSONAL DATA OF THE DATA SUBJECT?**

SYNEVO retains personal data for the period necessary to achieve the purpose described above, within the time limits prescribed by law and other regulations, and in certain cases as long as it is reasonable and advisable in the context of the applicable limitation period.

SYNEVO will keep the personal data of the data subject accurate and up-to-date, based on the data provided by the data subject or determined by SYNEVO in the provision of services.

The deadlines for the retention of personal data of data subjects and other rules for the retention of personal data are specified in the SYNEVO Personal Data Retention Policy available upon request.

After the expiration of the time required for data processing, we will securely delete or destroy your data.

### **4. WHO HAS ACCESS TO THE DATA SUBJECTS' PERSONAL DATA?**

Personal data is stored on a protected infrastructure that is restricted from outside access. Only persons authorised to maintain the infrastructure have access to it, while only authorised persons specifically in charge of collecting, processing and using certain personal data within the framework of their duties, e.g. a confidential person or his/her deputy, and other persons, such as SYNEVO employees participating in the whistleblowing procedure, have access to personal data.

These persons are obliged to maintain the confidentiality of personal data and to act in accordance with applicable regulations, data protection notices, policies, procedures and other general acts and contractually assumed obligations of SYNEVO.

To the extent necessary and permitted by law, in order to achieve the purposes for which the personal data was collected and/or processed, SYNEVO may share it with third parties/recipients as:

- State and public authorities, judicial authorities, legal persons vested with public authority or privately owned legal entities, where SYNEVO is obliged to provide personal data of data subjects on the basis of a legal obligation or when it is necessary for SYNEVO to protect its rights and interests.

SYNEVO transfers personal data only to the extent necessary for the fulfilment of the respective lawful purpose.

## **5. HOW IS THE PERSONAL DATA OF DATA SUBJECTS PROTECTED?**

In order to protect the personal data of the whistleblower, SYNEVO takes appropriate protection measures that are in accordance with the applicable regulations on the protection of privacy and personal data.

This includes a request to the service providers of SYNEVO to implement appropriate measures to protect the confidentiality and security of the whistleblower's personal data.

In its operations, SYNEVO has implemented technical, physical and organizational measures to protect the personal data of data subjects from accidental or unlawful destruction, accidental loss, damage, alteration, unauthorized disclosure or access, and from all other forms of unlawful and/or excessive processing.

## **6. WHAT ARE THE RIGHTS OF DATA SUBJECTS AND HOW CAN THEY BE EXERCISED?**

Within the framework of personal data protection, whistleblowers have the following rights:

**6.1.** the right to access their personal data, i.e. the right to request confirmation as to whether their personal data is being processed and, if such data is being processed, the right to request access to and information about the processing and a copy of the personal data being processed;

**6.2.** the right to rectification of inaccurate and incomplete data;

**6.3.** the right to erasure of personal data, in particular if such data are no longer necessary in relation to the purposes for which they were collected, if they have been unlawfully processed, if there is an obligation to erase them in order to comply with legal obligations, or if you have withdrawn your consent;

**6.4.** the right to restrict the processing of personal data;

**6.5.** the right to object to the processing of personal data;

**6.6.** the right to lodge a complaint with the Personal Data Protection Agency.

SYNEVO Hrvatska - poliklinika will take all measures to enable whistleblowers to exercise the above rights, but in certain cases the exercise of these rights may be limited or excluded.

## **7. WHO CAN YOU CONTACT WITH QUESTIONS ABOUT PERSONAL DATA PROTECTION?**

For any additional information, you are welcome to contact SYNEVO or its Data Protection Officer by email at: [hr.dpo@synevo.com](mailto:hr.dpo@synevo.com);

in person at SYNEVO

or by sending a letter to the address SYNEVO Hrvatska - poliklinika, Kraljevićeva ulica 24, 10 000 Zagreb.

## **8. AMENDMENT TO THE NOTICE AND CONSOLIDATED VERSION**

This Notice shall apply from 15.12.2025. and may be amended from time to time. The latest version of this Notice, which will always be authoritative for the processing of personal data of whistleblowers, is available at the link and at the premises of SYNEVO.