

INFORMATION CLAUSE FOR WHISTLEBLOWERS

1. Why we process your data?

In connection with the entry into force of the provisions of the Whistleblower Protection Act of 14 June 2024 (the "Act"), the Company, as a legal entity within the meaning of the Act, will process personal data of persons submitting internal reports (the "Whistleblowers") in accordance with 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, and repealing Directive 95/46/EC ("GDPR").

2. Who is the data controller of personal data?

The data controller of the Whistleblower's personal data is accordingly **BMW Financial Services Polska sp. z o.o.** or **Alphabet Insurance Services Polska sp. z o.o.** or **Alphabet Polska Fleet Management sp. z o.o.** (the "Company") – depending on to which Company the Whistleblower's internal report relates ("Report"). The Companies registered offices are located at ul. Wołoska 22a, 02-675, Warsaw.

BMW Financial Services Polska sp. z o.o. and Alphabet Insurance Services Polska sp. z o.o. and Alphabet Polska Fleet Management sp. z o.o. are companies belonging to the same capital group and therefore the information on the processing of personal data in relation to the Reports is analogous and has been included in this single information clause.

3. For what purpose and under which legal basis do we process data?

Company will process your personal data contained in the internal report for the purposes related to reported cases of a breach of the law on the basis of:

- (a) the legal obligation following from the provisions of the Act (in accordance with Article 6 section 1(c) of the GDPR) – in particular Article 8 section 4 of the Act and Article 29 of the Act, as well as
- (b) the controller's legally justified interest in accepting, verifying and clarifying Reports (pursuant to Article 6 section 1(f) of the GDPR);
- (c) the necessity of the processing for reasons of a substantial public interest (pursuant to Article 9 section 2(g) of the GDPR) on the basis of the Act, in particular Article 8 section 2 and 4 of the Act - in the case of the processing of special category personal data,
- (d) consents (in accordance with Article 6 section 1(a) of the GDPR), if you do not choose to remain anonymous.

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4. How long do we store your personal data?

Personal data will be processed for 3 years following the end of the calendar year in which the follow-up undertaken as a result of the internal report was completed or following the end of the proceedings initiated by these actions.

Where documents containing personal data are/will be the subject of administrative or judicial proceedings, the period for processing such data may be correspondingly longer to the extent justified by the applicable legislation.

Personal data that are irrelevant to the processing of a Report are not collected, and if accidentally collected – are deleted without delay. These personal data are deleted within 14 days of when it is established that they are irrelevant to the case.

5. With whom we share your personal data?

The recipients of the personal data will be public entities competent to undertake Follow-up, e.g. police, public prosecutor and processors to whom Spółka has contractually entrusted the processing of the data, including but not limited to IT support service providers or external entities to which activities related to the handling of the whistleblower process have been delegated (outsourced) to the extent permitted by the Act, in particular BMW AG with registered office in Munich (Germany), which is part of the BMW Group. We assure you that these entities will protect your identity and will not disclose it without consent.

6. Transfer of data to third countries (outside of EEA)

Personal data will not be transferred to a third country or international organisation.

7. Profiling and automated decision-making

Your personal data will not be subject to profiling or automated decision-making.

8. Your rights concerning the protection of data

You have the right to request access to your personal data, and to rectify them. You also have the right to request the deletion or restriction of processing, as well as to object to its processing (to the extent the data are processed based on the legitimate interest), but only if further processing is not necessary for the Company to comply with its legal obligation and there are no other valid legally justified grounds for processing overriding the rights and interests of the Whistleblower.

If consent is given to the disclosure of identity or to the recording of an oral report, the Reporting Person may withdraw this consent at any time. The withdrawal of consent will not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

The Reporting Person also has the right to lodge a complaint against the processing of personal data carried out by the Company to the President of the Office for Personal Data Protection (address: ul. Stanisława Moniuszki 1A, 00-014 Warsaw).

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9. Is it mandatory to provide data?

The provision of personal data is voluntary.

10. Contact with us

If you have any questions about how we use your data or you would like to exercise your rights, please contact directly our Data Protection Officer at e-mail address: daneosobowe.fs@bmw.pl or daneosobowe@alphabet.pl .

Warsaw, August 2025.