

Whistleblower Channel Policy



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Purpose	Defines the procedures for accessing the Whistleblowing Channel
Owner	<i>Chief Compliance Officer</i>
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1. PURPOSE

This Whistleblower Channel Policy aims ensuring (i) the definition of the processes to use the Whistleblower Channel, (ii) the compliance with the applicable regulations and (iii) the ethical values of the Start Campus Group.

This Procedure applies to Start Campus:

- **START - Sines Transatlantic Renewable & Technology Campus, S.A.**, with registered office at Avenida Engenheiro Duarte Pacheco, Amoreiras Tower 1, 13th floor, room 1, 1070-101, Lisboa, VAT No. 515 949 841.

This Procedure is evidence of Start Campus' determination against behaviours that run counter to Start Campus' values and demonstrates the commitment to continuously reinforce culture of integrity and ethical conduct and is intended to ensure that Start Campus complies with the obligations of the European Directive (UE) 2019/1937 on the protection of persons who report violations of EU laws of October 23, 2019, and with Law no. 93/2021, of 20 December which establishes the General Regime for the Protection of Whistleblowers, and other applicable legislation ("**Applicable Legislation**").

Start Campus values its prestige, resulting from the good work of its people, as a paramount asset.

However, this prestige, garnered over time, may be jeopardized or damaged by an inappropriate or irregular deed by a single employee, officer, director, manufacturer, supplier or third party with whom Start Campus is engaged in a direct employment, commercial or professional relationship. To prevent these behaviours, Start Campus requires from anyone with whom it may have a direct or indirect employment, commercial or professional relationship, that they carry out their business pursuant to the prevailing rules and regulations in force and its internal regulations, namely, the Code of Conduct. Likewise, the collaboration of said persons in detecting and preventing irregular or unlawful conducts which may jeopardize Start Campus' reputation or entail a violation of applicable statutory provisions or of Start Campus' internal regulations and commitment to protecting Human Rights, is essential.

Situations where Start Campus' prestige may be damaged may include, but are not limited to:

- Criminal activity.
- Danger to health and safety.
- Damage to the environment.
- Bribery and corruption.
- Facilitation payments.
- Influence peddling.
- Money laundering.
- Theft.
- Harassment or bullying.
- Discrimination.
- Fraud.
- Undisclosed and relevant conflict of interest.
- Financial mismanagement.
- Negligence.
- Tax evasion.

- Non-compliance with competition and State aid regulations, with public procurement regulations, with consumer protection regulations and with personal data protection regulations.

Additionally, according to Portuguese law, legal persons may become liable for such conducts committed by their employees, officers, and directors in the performance of their duties, it is recommended to set a number of measures to prevent, as much as possible, the commission of the above referred offences, including setting up communication and Whistleblower Channel. Likewise, pursuant to the most exacting international standards in the field of Compliance and Human Rights, Whistleblowing lines constitute a key element to detect and manage potential risks of noncompliance and thus support the Start Campus's commitment to promoting and respecting the corporate ethics culture.

For such purposes, Start Campus relies on this Procedure, which proceedings are hereunder described. Upon implementing such Whistleblower Channel, Start Campus has taken into account the Portuguese and European Union regulations on data protection, which are at the basis of the principles and commitments covered in its internal regulations on personal data and privacy.

In any case, Start Campus will respect and comply with any other applicable regulations or provisions, whether of a criminal or employment-related nature, or any other applicable regulations in the markets where it operates.

2. SCOPE OF APPLICATION

Start Campus makes available the Procedure to all its employees, manufacturers, suppliers or third parties with whom it has a direct relationship and a lawful business or professional interest (the **"Relevant Parties"**), at all levels. The Whistleblower Channel is a confidential channel to:

- **give notice of any breach of the Codes of Conduct of Start Campus as well as of any other internal conduct regulations.**
- **give notice of any act or omission that are being carried out breaching the applicable Laws.**

Queries and notices (jointly referred to as **"Concerns"**) reported through the Whistleblower Channel shall never relate to any sphere other than those referred to above.

The Relevant Parties shall only provide such specific and objective information that is required to determine whether the object of their Concern falls within the scope described. They must also refrain, unless this is essential to understand the scope of the Concern, from providing personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning the sex life or sexual orientation of the Relevant Parties, the Reported party or any other natural person.

The Whistleblower Channel is a supplementary tool that does not replace any of the usual communication channels between Start Campus and its employees, manufacturers, suppliers and other third parties with whom it has a direct employment, commercial or professional relationship. In this regard, the Relevant Parties shall attempt, and Start Campus shall encourage, to the extent possible, use of such internal channels prior to resorting to the Whistleblower Channel. Likewise, the Whistleblower Channel shall not detract access by the Relevant Parties to any other court or out-of-court grievance mechanisms.

Labour and human resources management issues of Start Campus should not be reported through the unless they fall within the scope of application above. Such issues shall be reported through the ordinary channels of Start Campus, such as the Human Resources Department.

At any rate, Start Campus shall observe and comply with any other applicable regulations or provisions, whether criminal or employment-related, or any other applicable regulations in the markets where it operates.

This Procedure shall be available to all Start Campus employees on [Whistleblower](#) or [SC - Home \(sharepoint.com\)](#). Likewise, this Policy shall be subject to the appropriate circulation, training and awareness-raising proceedings, to ensure its understanding and enforcement.

3. HOW TO REPORT A CONCERN

The Whistleblower Channel may be contacted through any of the following means:

- E-mail sent to: compliance@startcampus.pt
- Ordinary post addressed to: Avenida Engenheiro Duarte Pacheco, Amoreiras Tower 1, 13th floor, room 1, 1070-101, Lisbon
- Internal channel: [Whistleblower](#) or [SC - Home \(sharepoint.com\)](#)
- Concerns can also be reported verbally to a member of the designated team. This can be done either by telephone or through a physical meeting.

Only those individuals specifically appointed for the regular management of the Whistleblower Channel, as part of their internal control and compliance duties, shall have direct access to such addresses and to the contents of the Concerns, exclusively.

The Head of HR, Compliance and Legal Team are responsible for promoting the necessary investigations, and proposing, as the case may be, the relevant remediation, prevention and awareness raising measures.

The Head of HR, Compliance and Legal Team shall act independently, doing its utmost efforts to ensure the confidentiality of the Concerns received, the Relevant Parties, and the documentation created, as the case may be.

4. CONTENTS OF CONCERNS

For the purposes of ensuring that investigations are accurate, and that Concerns are processed in a confidential manner, they shall include at least, and as the case may be, the following details:

- Identification details of the person who reports the Concerns, such as, name and surname, contact details and, as the case may be, details of the employee (job position or employee number).

Notwithstanding the foregoing, to ensure that the Whistleblower Channel is properly run, and that the privacy of the Relevant Parties is protected, Start Campus will also manage ex-officio such Concerns where the identification of the Relevant Parties is not provided, as they are anonymously reported.

- Association of the Party concerned with Start Campus and, as the case may be, with the affected company of Start Campus or of a third party.
- Identification details of the person or persons to whom the alleged non-compliance is attributed.
- Fact or facts of the breach, specifying as far as possible, the violation of the regulations observed.
- Supporting documentation of the breach, where possible.

5. GUARANTEES AND PROTECTIVE MEASURES

5.1. CONFIDENTIALITY

Start Campus guarantees the absolute confidentiality of the Concerns received through the Whistleblower Channel, and of the identity of the Relevant Parties, including the information from which the identity of the Relevant Parties can be directly or indirectly inferred, which will not be revealed to the Reported party or to the rest of Start Campus, without the consent of the Relevant Parties. All the individuals who are apprised of the Concern shall be compelled to keep the Concerns strictly confidential, in all their terms, including the data of the parties.

These confidentiality obligations shall not apply where Start Campus is compelled to reveal and/or make available information and/or documentation relating to its proceedings, including the identity of the parties involved, at the request of a competent court or administrative authority.

5.2. NON-RETALIATION AND PRESUMPTION OF INNOCENCE

Acts or retaliation against anyone who reports through the Whistleblower Channel an actual or suspected breach are strictly forbidden, as are acts of retaliation against anyone who may collaborate with the investigation or help resolve it (facilitators) as well as third persons who are connected with the reporting persons and who could suffer retaliation, such as work colleagues or relatives, and legal entities that the reporting persons own, work for or are otherwise connected with in a work-related context, provided that the Concerns are reported in good faith, and having a serious basis to believe that the information is true at the time of reporting.

Should Start Campus confirm that any Party concerned, acting in good faith and with the serious belief in the truthfulness of the Concern, has been subject to any punitive measure or retaliation,

those responsible for such measures shall be subject to investigation and to the relevant disciplinary action if necessary.

Start Campus shall ensure the appropriate protection of privacy, honour and personal data, the presumption of innocence and the right of defence of the Reported parties, especially in case of unfounded, false Concerns, or Concerns reported in bad faith, against which the relevant action shall be taken.

5.3. RIGHT TO BE HEARD

Pursuant to the provisions of section 6.4. below, Start Campus shall guarantee that in the course of the investigation of the Concern, the Party concerned, and the Reported Party shall enjoy the right to be heard, being entitled to defend themselves and to put forward arguments, written or in other forms, plead, and submit evidence, as appropriate.

5.4. TRANSPARENCY AND MINIMIZATION RELATING TO THE USE OF PERSONAL DATA

Start Campus guarantees observance of the principle of transparency and minimization relating to the use of personal data in the Whistleblower Channel, through the information provided to the Relevant Parties and the Reported parties in Annex I – Information about use of personal data of Relevant Parties and Reported parties.

6. HANDLING AND INVESTIGATION CONCERNS

6.1. RECEPTION AND ACCEPTANCE OF CONCERNS

Concerns reported through the Whistleblower Channel shall be received by the Head of HR, Compliance or Legal Team who will contact the Party concerned acknowledging receipt, and informing of the requirements, competent authorities, ways and possibilities to proceed with the external report of the breaches, within 7 days of reception thereof.

Upon receipt of the Concern, Start Campus shall verify first whether it falls under the remit of the Whistleblower Channel; if such was the case, Start Campus will launch proceedings and refer the matter to the relevant department or area to take the actions described in the paragraphs below. Otherwise, if the Concern falls outside of the Whistleblower Channel's remit, and/or it is not duly grounded, or fails generally to fulfil the requirements of accuracy and clarity, Start Campus will order the immediate closing of proceedings. At any rate, Start Campus will apprise the Party concerned of the decision made regarding the Concern (whether it has been admitted or closed) as well as the grounds thereof, no later than 3 months of acknowledgment of receipt, or failing such acknowledgement, Start Campus will have 3 months to inform the Party concerned of its decision upon expiry of seven days of reception of the Concern.

6.2. LAUNCHING OF PROCEEDINGS

Where, further to the review of the facts disclosed in the Concern, Start Campus considers that there are reasonable signs of a breach, as described in section 2 hereof, it will resolve to launch proceedings and the relevant internal investigation, referring the matter to such department(s) or area(s) which will be charged with the investigation, in accordance with the type of affair.

In parallel to the launching of the proceedings and of the investigation by the relevant area or department, Start Campus may take additional urgent measures to prevent jeopardizing the

investigation, or which may be required to protect the Party concerned, with the support of the relevant departments or areas.

6.3. INTERNAL INVESTIGATION REGARDING THE CONCERN

Upon conducting the internal investigation, Start Campus and/or any parties specifically appointed to take part or collaborate in the investigation, may gather the information and documentation they deem appropriate from any department, area, or company of Start Campus, or from third parties, considering in each case the relevance and the nature of the facts reported. Likewise, as many investigations as are deemed necessary in light of each specific case, can be launched, for the purposes of determining the certainty or plausibility of the facts or signs reported.

Start Campus will answer the Concerns reported, meeting the deadlines of the investigation, under local regulations. Upon whistleblower's request, Start Campus informs of the internal investigation results up to 15 days after its conclusion.

Start Campus shall take the relevant measures to ensure at all times the objectivity of the investigation, for the purposes of determining the certainty or plausibility of the facts or signs reported.

Likewise, should any member of the Head of HR, Compliance or Legal Team, and/or anyone appointed to collaborate with the investigation be directly or indirectly subject to any Concern, they shall refrain from taking part in the investigation and resolution thereof.

Notwithstanding the foregoing, Start Campus may entrust an external facilitator with the investigation, in such cases where, given the nature, seriousness, complexity or the identity of the parties involved in the facts, this is recommended to properly resolve the Concern.

Start Campus expressly reserves the right to take the necessary monitoring and control measures on the software tools and equipment that the Company makes available to its employees, including the contents of communications and devices, always in compliance with the applicable laws in the field and guaranteeing the principle of proportionality and dignity of employees.

6.4. INFORMATION AND RIGHT TO HEAR THE PARTIES

The natural or legal person(s), whose behaviour is suspected of allegedly being irregular in the Concern, shall be apprised by the Head of HR, Compliance and Legal Team of such circumstance and of the data processing and its purposes, where this is permitted considering the status of the proceedings and at any rate, within one (1) month of the date when the Concern was received, provided that the investigation of the facts reported is not hindered, in which case the information may be postponed.

Additionally, through the exercise of the right to hear the parties, Start Campus shall guarantee the right of the Party concerned and the Reported party to raise in writing arguments, plead and provide evidence, as appropriate.

6.5. FINDINGS AND COMPLETION OF THE INVESTIGATION

Based upon the conclusions drawn further to the internal investigation, the relevant department or area in charge will send a report to the Head of HR, Compliance and Legal Team.

The Head of HR, Chief Compliance Officer and Legal Team will consider the terms of such report and prepare a resolution which shall at least address:

- A brief description of the investigation.
- The facts proven in the course of the investigation.
- The findings, which may consist, as the case may be:

In declaring that a breach exists, in which case, the Head of HR, Chief Compliance Officer or Legal Team may resolve:

- The immediate cure of such breach and the adoption of the measures to repair the damage caused and to prevent any future breach, if appropriate.
- Disciplinary measures, ranging from a mere admonishment or warning to dismissal.
- Referring the resolution to the relevant department which will be charged with taking and at any rate applying the remediation measures which may be necessary. Such remediation measures shall be reported to the Head of HR, Chief Compliance Officer or Legal Team.

Closing of proceedings, where further to the internal investigation, the Head of HR, Chief Compliance Officer or Legal Team finds that no breach whatsoever has occurred.

As a guarantee, Start Campus shall only disclose the terms of the resolution and the type of measures taken, if any, to the head of the relevant department or area, to the Relevant Parties and the Reported parties, and, where disciplinary measures are required, to the Human Resources department, for the purposes of scheduling and implementing the same.

7. MAINTENANCE, CUSTODY AND FILING INFORMATION

Start Campus shall keep an updated registry of all Concerns received and, where appropriate, of the internal investigations carried out and of the measures taken, for the periods permitted by law, under applicable regulations.

Such registry, and the processing made by those involved in handling the Concerns received through the Whistleblower Channel, shall fulfil the appropriate technical and Start Campus measures to ensure an appropriate level of security of personal data considering the risk and, as the case may be, those provided in applicable data protection regulations.

Regarding the information that shall be kept recorded, it shall be updated at all times and shall include the following data:

- Date when the Concern was received.
- Means used to send such Concern.
- Details of the Reported party and of the Party concerned.
- A summary description of the type of Concern and of the facts regarding which a breach is observed.
- Dates of information to the Reported party and the Party concerned.
- Documentation used upon investigating the Concern.
- Status of the investigation.

Personal data gathered within the scope of the internal investigation shall be erased when they are no longer necessary and relevant and at any rate, within 5 years of the date when the Concern is registered, unless legal or administrative proceedings remain in progress.

Personal data regarding any Concern which fall outside the scope of the Whistleblower Channel, are not necessary to conduct the investigation and/or are not subject to any investigation, shall be erased without any delay, except for the transfer thereof to any Public Administration and/or Law Courts, where this is necessary to attend to any potential liability during the relevant forfeiture terms. Such data shall be subsequently physically destroyed.

8. DISCLOSURE OF PROCEDURE

This Procedure will be available on Start Campus' intranet to all the employees, and it will be available to all the stakeholders of the Company on the corporate website. Likewise, the Procedure shall be subject to the relevant disclosure, training and awareness-raising proceedings for the appropriate understanding and implementation thereof.

9. UPDATE AND REVIEW OF PROCEDURE

This Procedure shall be reviewed and updated, where applicable, for the purposes of encompassing any changes which may arise in the business model or in the context where Start Campus operates, ensuring at all times the effective implementation thereof.

ANNEXES TO THE WHISTLEBLOWER CHANNEL

Annex I - Information about use of personal data of Relevant Parties and Reported parties

Annex II – Standard Form of Concern

ANNEX I

INFORMATION ABOUT USE OF PERSONAL DATA OF RELEVANT PARTIES AND REPORTED PARTIES

1. DATA CONTROLLER AND CONTACT OF THE DATA PROTECTION OFFICER

Pursuant to the regulations on data protection, the data controller is Start Campus:

- **START - Sines Transatlantic Renewable & Technology Campus, S.A.**, with registered office at Avenida Engenheiro Duarte Pacheco, Amoreiras Tower 1, 13th floor, room 1, 1070- 101, Lisbon, VAT No. 515949841.

Relevant Parties may contact the Data Protection Officer at privacy@startcampus.pt

2. CATEGORIES OF PERSONAL DATA

The following categories of data can be gathered in the framework of a Concern:

- Identification data, such as name and surname, contact details, and the details of the Reported Party and the party concerned relating to their status as employee, such as position or employee number.
- Relationship with Start Campus or other affected third parties.
- Reported breaches.
- Documentation in support of reported breaches.

3. PURPOSES AND LEGAL BASIS OF PROCESSING

Data shall be processed for the purposes of detecting, investigating, and legally assessing suspected breach of the laws identified in the scope of this procedure, from time to time in force.

Facts or processing reported need to be effectively associated with the employment, business or professional relationship directly linking the Reported party with Start Campus.

Likewise, processing of personal data provided in the Concern takes place in the framework of the employment, business or professional relationship with the entity of Start Campus with which the relevant employment, commercial or professional agreement, has been negotiated and/or executed.

Therefore, the lawful basis for personal data processing shall be compliance with Law no. 93/2021, of 20 December 2021 and act in the event of violation of applicable laws in the scope of that legal act. We have a legitimate interest in pursuing and preventing any proceedings contrary to internal policies. Major international organizations, such as the EU and the OECD, have highlighted the importance of good corporate governance principles for the effective functioning of organizations. A whistleblowing channel supports these principles by providing a secure and confidential mechanism for employees to report irregularities and questionable practices. This not only promotes a culture of accountability and integrity but also ensures that potential issues are promptly identified and addressed, thereby reducing the risk of misconduct. Therefore, the implementation of a whistleblowing channel is a

legitimate interest of Start Campus, as it aligns with recognized international standards and best practices for corporate governance, ultimately safeguarding the interests of all stakeholders and contributing to the organization's overall stability and trustworthiness.

4. DATA OF REPORTED PARTIES

Likewise, under applicable regulations, the Reported parties shall be apprised of the violation they have been accused of, of the departments and third parties with whom such information can be shared, and of how to exercise their rights regarding their personal data, in accordance with data protection regulations. Start Campus will proceed with the immediate deletion of all personal data that are not manifestly relevant for the processing of the Complaint. At any rate, the Reported party's right of access shall be limited to his/her own personal data exclusively, without the exercise of such right extending to the personal data of the Party concerned.

At any rate, the period allowed to inform the Reported party shall not exceed one (1) month from receipt of the Concern. Nonetheless, Reported Party's information rights, as well as the rights identified in section 8 hereunder, may be restricted, whenever informing the Reported Party or allowing him/her to exercise these rights may hinder the investigation of the facts reported, or the circumstances of the Concern would not otherwise permit it; in such case, the information can be postponed until disappearance of the risk.

5. STORAGE PERIOD

Personal data gathered through the Whistleblower Channel shall be stored in accordance with the provisions of applicable laws, as described in section 7 above. Namely, data will be stored for as long as it is necessary to decide on whether or not the facts reported should be investigated. However, should personal data need to be processed for a longer period, in order to continue the investigation, or because a decision has been made to take legal action, data will be stored in a different environment outside the Whistleblower Channel, should this be necessary to complete the investigation or for Start Campus to bring the relevant court proceedings.

6. RECIPIENTS OF PERSONAL DATA

To fulfil the processing purposes above referred, Start Campus will give access to personal data to service providers, such as external advisors and collaborators who provide support with the handling or, as the case may be, the investigation of the Concerns received through the Whistleblower Channel, and potentially, where action needs to be taken as a result of the investigation, the relevant areas/departments/entities of Start Campus which will be involved in the investigation and the potential action to be taken regarding the reported behaviour in question.

Likewise, data may also be transferred to judges, law courts, the Office of the Public Prosecutor or competent public administration, as a result of the investigation which may be launched.

7. INTERNATIONAL TRANSFERS

In this regard, some entities both of Start Campus Group and outside, above referred, may be found outside the European Economic Area and therefore, not be subject to a level of protection equivalent to the one provided in the European Union.

In such cases, we inform you that we transfer your data with adequate safeguards and always keeping your data safe, using the most convenient international data transfer tools, for example the Standard Contractual Clauses and any relevant supplementary measures. You may consult the content of such Standard Contractual Clauses through the following link:

https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outsideeu/modelcontracts-transfer-personal-data-third-countries_en.

8. RIGHTS

As stated in the Data Protection Policy, Start Campus must allow data subjects to exercise certain rights in relation to their personal data. These include:

- Right of access: the Party concerned is entitled to obtain from Start Campus confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, to request access to personal data. Access data include, without limitation, the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed. They can obtain a copy of the personal data undergoing processing.
- Right to rectification: right to obtain from Start Campus the rectification of inaccurate or incomplete personal data concerning him or her.
- Right to erasure (right to be forgotten): right to obtain from Start Campus the erasure of personal data concerning him or her.
- Right to restriction of processing: right to obtain from Start Campus restriction of processing of his/her personal data; however, Start Campus will carry out a review on a case-by-case basis, to determine whether or not the exercise of such right shall apply.
- Right to object: where certain circumstances are met, right to object to Start Campus' processing of his/her personal data.

The Relevant Parties and the Reported parties will be entitled to exercise their rights by sending a

letter to the registered office, or an email to the following email addresses:

compliance@startcampus.pt and privacy@startcampus.pt identifying the right they wish to exercise.

ANNEX II

STANDARD FORM OF CONCERN

PROCEDURE – START CAMPUS

FORM OF CONCERN

[NOTE: all data are mandatory unless otherwise stated herein]

IDENTITY OF THE REPORTING PARTY		
Name		
Surname		
Email		
Telephone n.º		
Association with Start Campus (check the appropriate box)	Director	
	Employee (please state your position, department or employee number)	
	Manufacturer	
	Supplier (please state the type of services provided to Start Campus)	
	Customer	
	Others	

IDENTITY OF THE REPORTED PARTY		
Name		
Surname		
Email		
Telephone n.º		
Company/Start Campus		
Association with Start Campus (check the appropriate box)	Director	
	Employee (please state your position, department or employee number)	
	Manufacturer	
	Supplier (please state the type of services provided to Start Campus)	
	Customer	

	Others	
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PURPOSE OF CONCERN

(please briefly state the purpose of your query or report)

Query	
Report	

INFORMATION ABOUT THE CONCERN

Note: Unless it is essential to understand the scope of the Concern, you should refrain from providing personal revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning the sex life or sexual orientation of a natural person.

Objective description of the query or facts regarding which a breach is observed

--

Approximate date when facts occurred

--

Start Campus's company(es) affected

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Supporting documentation/ evidence in support of the facts and additional evidence

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Additional remarks

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- ☐ I represent that I report this Concern in good faith and that all details reported are true, except for any unintentional mistake or omission.
- ☐ I am aware of the processing that personal data herein included may undergo and which is summarised below.

Basic information on data protection	
Data controller	START - Sines Transatlantic Renewable & Technology Campus, S.A and Start Campus Energy, Unipessoal Lda (wherein the Head of HR, Chief Compliance Officer and Legal Team is included).
Purposes and legal basis of processing	We are entitled to process the data as we have a legal obligation to establish internal reporting channels under Law no. 93/2021, of 20 December 2021 and a legitimate interest in pursuing and preventing any proceedings contrary to internal policies.
Recipients	<i>We share data with service providers and collaborators within and outside the European Economic Area, and with the relevant authorities.</i>
Rights	You have the right of access, right to rectification or erasure, and, occasionally, the right to object to processing, as explained in the additional information. You also have the right to file a complaint with the competent Data Protection Supervisory Authority – Comissão Nacional de Proteção de Dados - https://www.cnpd.pt/
Additional information	For further information please refer to Annex I of the Whistleblower Channel Procedure of Start Campus.