

## **PRIVACY STATEMENT**

### **DATA PROCESSING OPERATION: 'INL WHISTBLOWER CHANNEL'**

#### **1. Introduction**

The International Iberian Nanotechnology Laboratory ('INL') is an international organisation created to promote interdisciplinary research on nanotechnology and nanoscience. Aiming to become a vital part of Europe's scientific area, the INL provides a high-tech research environment addressing major challenges in nanomedicine, nanotechnology applied to environmental and food control nanoelectronics, and nanomachines and molecular manipulation at nanoscale. The cornerstones of INL's mission are: assuring world-class research excellence in its areas of activity; creating strong scientific communities in the field of nanoscience and nanotechnology, in close liaison with global-scale laboratories; developing collaboration between universities and industries, as well as between public and private sectors, training researchers, and contributing to the development of a skilled work force for the nanotechnology industry; organizing and sponsoring European and international co-operation in nanoscience and nanotechnology research; setting up intellectual property rules to make the results of its work and know-how available, enable the technology transfer and protect its inventions; developing systems to prevent and master nanotechnology risks.

INL respects your privacy and is committed to protect your personal data. This privacy statement serves to inform you how we look after your personal data and tell you about your privacy rights.

As part of this commitment, INL has established an Internal Whistleblowing Channel under Director-General Resolution No. DGR/DIR/336 and the Whistleblower Policy. This Privacy Statement explains how personal data is processed in the context of whistleblowing reports.

#### **2. Purpose**

The purpose of this data processing operation is to enable the secure, confidential, and effective submission and handling of whistleblowing reports concerning potential infractions, in accordance with the INL Whistleblower Policy.

#### **3. Description of the data processing operation**

Personal data included in a whistleblowing report will be processed solely for the purpose of:

- a) Receiving, registering, and reviewing reports submitted via the Internal Whistleblowing Channel;
- b) Conducting assessments and investigations of reported infractions;

- c) Following up with the Reporting Individual (where identification is provided or where further information is necessary);
- d) Documenting the handling and outcome of the report.

Reports may be submitted with identification or anonymously.

#### **4. Data processed**

Depending on the report, the following data, which may include personal data, may be processed: (i) identity and contact details of the Reporting Individual (if provided); (ii) identity and relevant information of the individual(s) concerned by the report; (iii) Details of the alleged infraction; and (iii) any supporting evidence submitted with the report, which may include images, videos and recordings.

#### **5. Controller of the processing operation**

The INTERNATIONAL IBERIAN NANOTECHNOLOGY LABORATORY (INL) is responsible for the management of the data processed under this operation through the Whistleblower Channel.

#### **6. Legal Basis**

The processing of personal data in the context of the Whistleblower Channel is based on INL's legitimate interest in ensuring the effective implementation of its Whistleblower Policy, including the prevention, detection, and handling of misconduct. Where special categories of personal data are reported, processing is based on the INL Data Protection Regulation.

#### **7. Security Measures**

INL shall ensure that it has in place appropriate technical and organisational measures to protect against unauthorised or unlawful processing of Personal Data and against accidental loss or destruction of, or damage to, Personal Data, appropriate to the harm that might result from the unauthorised or unlawful processing or accidental loss, destruction or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures.

Whistleblower Software by Formalize, the software adopted by INL as whistleblower channel, is committed to providing a highly secure and privacy-friendly solution. We follow the Privacy by Design principles. All data is stored in Europe, Frankfurt. Our solution is fully compliant with GDPR and Schrems II. We are ISO27001 certified, use ISO27001 certified hosting, are ENS certified and we are ISAE3000 audited. To ensure the highest level of security, we regularly undertake third-party penetration tests. We also use End-to-End Encryption to guarantee a high standard of data privacy in communications through our platform.

## **8. Recipients of the data**

Personal data will only be accessed by: (i) INL staff duly authorised to handle whistleblowing reports; (ii) INL Ombudsperson, where applicable.

Personal data will not be disclosed to third parties except where strictly necessary for investigative purposes or required by applicable law.

## **9. Legality of processing**

Processing is necessary for the performance of the tasks carried out on the basis of INL Statute necessary to fulfill its mission, particularly to ensure compliance with the Whistleblower Policy and related regulations. Processing is conducted in accordance with the INL Data Protection Regulation (available for consultation at <https://inl.int/>).

## **10. Provision, access and rectification of the data**

Each person has the right to access his or her own personal data and the right to correct any inaccurate or incomplete personal data, as well as to request the removal of his or her personal data.

Responses will be provided within a reasonable period, taking into account the need to protect the integrity and confidentiality of the investigation.

Requests or queries concerning the processing of personal data should be addressed to the following email: [dataprotection@int.int](mailto:dataprotection@int.int).

## **11. Time limit for storing data**

Whistleblowing reports and related personal data shall be retained only for as long as necessary to complete the review and investigation process, and to comply with INL's governance and record-keeping requirements. Thereafter, data will be securely deleted or anonymised.