

Whistleblower guidelines

The following guidelines apply to

- Team Services BG EOOD, UIC 205937541
- Care Services BG EOOD, UIC 205937670

(hereinafter referred to as the “Companies”).

In order to comply with their legal obligations, the aforementioned companies have decided to adopt a joint

Whistleblowing Regulation

All employees and stakeholders of the aforementioned Companies are encouraged to report any violations of which they become aware. The management hereby assures that the confidentiality and protection of whistleblowers will be ensured. Under no circumstances will any employment consequences be threatened or implemented simply because a person employed by or on behalf of the aforementioned Companies exercises his or her right to make a permissible report. The management considers it its duty to comply with all violations. Because this is the only way to ensure transparency and the involvement of the legal provisions.

I. Establishment of the internal reporting office

1. An internal reporting office for Companies is established.
The following persons will be assigned to this office:
 - a. Zlatin Georgiev;
 - b. Ani Kolarska
 - Authorization to accept and verification reports (**Annex No. 1**).
2. The external reporting body is the Commission for the Protection of Personal Data (“CPPD”) („Комисията за защита на личните данни (КЗЛД)“), <https://www.cpdp.bg/index.php>.
3. Reports under this Policy might be submitted by current and former employees, job applicants (including freelancers, interns, part-timers, contractors under civil contracts), directors, officers, shareholders, auditors, members of corporate bodies, contractors, business partners (including suppliers, customers and joint venture partners and their employees) of any of the above Companies or relatives of the above persons (jointly referred to as “Whistleblowers”).

4. It is clarified that Whistleblowers have a choice whether to go to the internal or external channel to report a violation. As there is an internal reporting office, which is equipped with the necessary personnel and financial resources, to thereby ensure effective and efficient processing while preserving anonymity, it is recommended that violations be preferentially reported to the internal reporting office.
5. The internal reporting office prepares reports on the reports received, the investigations carried out, follow-up measures taken. The reports shall be made in compliance with the applicable law and the guidelines of the controlling authority – the CPPD. The reports and the corresponding documentation shall be stored securely and protected from access by third parties.

II. Tasks of the internal reporting offices

1. The internal reporting office (para. I No. 1) operates the internal reporting channel of each of the Companies according to para. III, conducts the procedure according to the following para. IV below and takes follow-up measures in accordance with the following para. V.
2. The respective members of the reporting office are bound to the strictest confidentiality.

III. Internal Reporting channel for the report

1. An internal reporting channel shall be set up under where persons employed for Companies can submit a report as follows:
 - application form available at <https://www.promedica24.bg>;
 - E-mail: whistleblower@promedica24.bg;
 - Postal address: Pozitano str. 7 office 7, Sofia 1000, Bulgaria;
 - Orally via personal or e-meeting with the officer/s above or via phone call to
+35 924 916 186, +359 249 16088
2. Reports can also be made anonymously. However, anonymous reports will be registered in a separate register and are not subject to review and protection under the rules of the Act on the Protection of Persons Reporting Information or Publicly Disclosing Information on Breaches (“**Whistleblowers Protection Act**” or “Закон за лицата, подаващи сигнали или публично оповестяващи информация за нарушения” in Bulgarian).

3. The channel is set up so that only the members of the internal reporting office have access to the report.
4. All incoming reports are documented following the statutory required template while maintaining confidentiality with regard to the person making the report, the person who is the subject of a report and all other persons named in the report (**Annex No. 2**). The identity of the persons is only disclosed to the members of the internal reporting office or, if applicable, to third parties who are obliged to maintain professional secrecy (e.g. external lawyers, consultants, competent authorities, etc.). The requirement of confidentiality of identity applies regardless of whether reporting office is responsible for the incoming report.
5. Only data provided by the respective whistleblower and necessary for the review and processing of the report will be processed. If any personal data in excess of these needs are provided/collected at some stage of the procedure, these data will not be processed and shall be deleted as soon as practically possible. The use of the data provided for purposes other than the processing of the infringement with regard to the respective national whistleblower protection law does not take place.
6. The reports, the attached materials to them and any subsequent data/documentation collected in the process of review of the report are stored for a period of five years after closing the review of the report, unless there is pending criminal, labour, civil or administrative law procedure in relation of the submitted report.

IV. Procedure

1. Applicability: Reporting deadlines, types of infringements
 - a. The whistleblower should report violations within three months of becoming aware of them but no longer than two years of their occurrence. The internal reporting office checks whether it is possible to process the tip (report) despite the late report.
 - b. Only those tips (reports) may be made where the whistleblower has a good faith belief that the facts he or she is disclosing are accurate. The reporting person is not in good faith if he or she knows that a reported fact is untrue. In case of doubt, relevant facts are not to be presented as fact, but as conjecture, evaluation or as a statement of other persons.
 - c. Whistleblowers report violations of the provisions mentioned below:
 - i. Violations within the meaning of Art. 3 of the Act of 31.01.2023 (Закон за лицата, подаващи сигнали или публично оповестяващи информация за нарушения),

- ii. Infringements that are punishable by law,
 - iii. Infringements that are subject to a fine, insofar as the infringed provision serves to protect life, limb or health or to protect the rights of employees or their representative bodies,
 - iv. Infringements of European Union law, such as violations of EU directives or regulations,
 - v. Criminal offences, such as corruption, fraud or theft,
 - vi. Infringements of labour and employment rights, such as discrimination in the workplace or violation of occupational safety and health regulations,
 - vii. Infringements of environmental laws, such as illegal waste disposal or pollution of water bodies...,
 - viii. Infringements of public procurement and tendering procedures, such as bribery in connection with public contracts,
 - ix. Infringements of competition law,
 - x. Infringements of the Money Laundering Act.
- d. The following reports are not registered, reviewed and protected under the rules of the Whistleblower Protection Act:
- i. Anonymous reports;
 - ii. Reports that refer to violations having occurred in excess of two years ago from the reporting date;
 - iii. Complaints and signals evidently referring to any types of unsatisfactory practice, act, etc. not falling within the scope per point c) above.
- e. The internal reporting office confirms receipt to the whistleblower within 7 days. If applicable, this confirmation includes instruction on alleviation of deficiency in the report which the whistleblower is required to address accordingly within seven days, otherwise the report is returned to the whistleblower and no further actions are taken.
- f. Subsequently, the internal reporting office checks whether the reported infringement falls under point c) above, i.e. even if the circumstances are correct, it triggers the responsibility of the internal reporting office. If this is not the case, the result - lack of jurisdiction - is communicated to the whistleblower that no proceedings have been initiated. If possible, this shall be done within the time limit of point e) above.



2. Procedure for reviewing reports received

- a. The internal reporting office investigates and processes whether the reported allegation is true. In the course of the processing, strict anonymity of the whistleblower shall be guaranteed. The reporting office shall hear the individuals and review the internal procedure to prevent the infringements. In particular, the audit shall consider the following points:
 - i. Check whether the reported infringement falls within the material scope of the Directive and national law on whistleblower protection, cf. para. IV No. 1 c);
 - ii. Maintaining contact with the whistleblower, if contact is possible,
 - iii. Checking the validity of the tip (the report received),
 - iv. Requesting further information from the whistleblower if necessary and contact is possible,
 - v. Taking appropriate follow-up action in accordance with V of this policy.
- b. The internal reporting office shall provide feedback to the whistleblower after three months following confirmation of receipt or after three months and seven days if no confirmation of receipt has been provided. The feedback includes the notification of planned and already taken follow-up measures as well as the reasons for these.
- c. Feedback to the whistleblower in accordance with point b) above may only be provided insofar as it does not affect internal enquiries or investigations and the rights of the persons who are the subject of a report or who are named in the report. If feedback is not possible, the reason for not providing detailed feedback is discussed.

V. Follow-up by the internal reporting office

1. As follow-up measures, the internal reporting office may in particular
 - a. conduct internal investigations at the employer or at the respective organisational unit and contact the persons and work units concerned,
 - b. refer the whistleblower to another competent body,
 - c. close the proceedings for lack of evidence or for other reasons; or
 - d. hand over the proceedings for further investigation, for example to:
 - i. a work unit responsible for internal investigations at the employer or at the relevant organisational unit,
 - ii. external experts; or
 - iii. a competent authority.

2. The internal reporting office shall prepare proposals for the board of directors on how to organise internal procedures if the investigation by the internal reporting office concludes that the report is valid.
3. In any case, the anonymity of the whistleblower is preserved to the maximum possible extent. If necessary, the persons who have caused an infringement of the legal provisions under investigation can be named to the board of directors or the management. The persons responsible shall decide on the measures to be taken, taking into account labour, contract or other applicable law.

VI. Register of internal reports:

1. A designated person shall keep the register of internal reports (**Annex No. 3**).
2. The register of internal reports shall be kept in compliance with data protection principles and the applicable whistleblowing legislation. The register shall be maintained with due regard to the obligation to preserve the anonymity of the identity of Whistleblowers and possible victims of violations.
3. The register shall record all cases of reports of violations committed or possible violations, regardless of the subsequent course of the proceedings.
4. The following data is recorded in the register of internal reports:
 - a) Unique identification number obtained by the CPPD;
 - b) Incoming number from the internal system of the company;
 - c) The person received the report;
 - d) Date of delivery of the report;
 - e) Affected person, if reported;
 - f) Summary of the alleged infringement such as place, period and additional circumstances under which it is performed, type of infringement, etc.;
 - g) Connection with other reports, if any;
 - h) Personal data of the whistleblower and the data subject necessary for their identification;
 - i) The contact address of the whistleblower;
 - j) follow-up information provided to the whistleblower and date of delivery;
 - k) Information on follow-up measures taken;
 - l) The results of the report review – verification process, including protection provided;
 - m) Retention period applicable to the report;
 - n) Date of closure of the case
5. The data in the register of internal reports will be kept for a period of 5 years from the date of acceptance of the report.



VII. Prohibition of reprisals/ guarantee of anonymity

1. The Companies guarantee that no reprisals under labour law or contractual law will be exercised against Whistleblowers. These are prohibited. The whistleblower does not have to fear any consequences in connection with the report that does not contain incorrect information or false accusations (i.e. was not made contrary to IV No. 1 b)).
2. The anonymity of the procedure is assured. This does not apply if the involvement of state authorities is required. The whistleblower will be informed of this. Nor does anonymity apply in the case of a report involving a violation of para. IV No. 1 b).
3. Any person who takes reprisals against a whistleblower will be subject to disciplinary action and a breach in this area will be treated as a serious breach of fundamental duties.

VIII. Data Protection

1. The personal data of the Whistleblower shall not be disclosed unless they give their consent.
2. The personal data of the Whistleblower or other data allowing for the determination of their identity may be disclosed without their consent only when such disclosure is a necessary and proportionate obligation arising from applicable legal provisions in the context of proceedings conducted by national authorities.
3. Upon receiving a report, the personal data of the individuals mentioned in the report may also be processed without their consent due to obligations imposed by legal provisions.
4. Personal data that are obviously irrelevant to the internal report under consideration shall not be collected, and if collected accidentally, they shall be promptly deleted.
5. The information clause is attached as **Annex No. 4**.

IX. Review of effectiveness / training of staff

1. This policy will be reviewed on an ongoing basis but in periods no longer than three years in order to ensure that it provides effective protection to Whistleblowers and that internal investigations are conducted effectively and with an open mind.
2. All employees should be made aware that an internal reporting unit has been established, that it maintains confidentiality and how possible violations should be reported.
3. The members of the internal reporting units shall participate in regular training.



Annex No. 1

Authorization to accept and verification reports, taking follow-up actions in relationship with external reports of violations of law

for which **Team Services BG EOOD**, UIC 205937541, headquartered at 9000 Varna, Varna Municipality, Odesos District, 68 Bratya Miladinovi str. Bulgaria, hereinafter referred to as the **“Administrator”**, is responsible.

Name and last name persons authorized:

Date of granting authorization :

Range authorizations

I authorize Mr/s to receive and verify reports, take subsequent actions on behalf of the Administrator in connection with reports of law violations coming from whistleblowers.

The authorization becomes invalid upon expiry or termination of the contract between Administrator and the authorized person or if it is withdrawn by Administrator.

Statement persons authorized:

I declare that I have familiarized myself with the procedure for reporting irregularities and protecting whistleblowers, and I commit to following the rules contained therein.

I undertake to maintain the confidentiality of all protected information to which I gain access, as well as the methods of their security, even after the termination of my authorization.

I confirm that in carrying out my duties, I am committed to maintaining the confidentiality of information obtained during the investigative proceedings or in the protection of the reporting individual and those assisting in the reporting process.

Signature of the Authorized Person:

Signature of the Authorizing Person:



Authorization to accept and verification reports, taking follow-up actions in relationship with external reports of violations of law

for which **Care Services BG EOOD**, UIC 205937670, headquartered at 9000 Varna, Varna Municipality, Odesos District, 68 Bratya Miladinovi str. Bulgaria, hereinafter referred to as the **“Administrator”**, is responsible.

Name and last name persons authorized:

Date of granting authorization :

Range authorizations

I authorize Mr./s to receive and verify reports, take subsequent actions on behalf of the Administrator in connection with reports of law violations coming from whistleblowers.

The authorization becomes invalid upon expiry or termination of the contract between Administrator and the authorized person or if it is withdrawn by Administrator.

Statement persons authorized:

I declare that I have familiarized myself with the procedure for reporting irregularities and protecting whistleblowers, and I commit to following the rules contained therein.

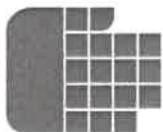
I undertake to maintain the confidentiality of all protected information to which I gain access, as well as the methods of their security, even after the termination of my authorization.

I confirm that in carrying out my duties, I am committed to maintaining the confidentiality of information obtained during the investigative proceedings or in the protection of the reporting individual and those assisting in the reporting process.

Signature of the Authorized Person:

Signature of the Authorizing Person:





REPUBLIC OF BULGARIA
COMMISSION FOR PERSONAL DATA PROTECTION

Registration index and date
...../.....

(to be completed by the official responsible for the receipt and registration of the report)

REPORT REGISTRATION FORM

FOR THE SUBMISSION OF INFORMATION ON BREACHES UNDER THE WHISTLEBLOWER PROTECTION ACT

IMPORTANT! Please read the instructions on pages 5 and 6 before completing the form.

To be completed by the official receiving the report	
UIN	Date
<input type="text"/>	<input type="text"/>
(Unique Identification Number – to be provided by the Central Authority)	
METHOD OF SUBMISSION	
<input type="checkbox"/> WRITTEN <input type="checkbox"/> VERBAL	
<input type="checkbox"/> VIA A PROXY	
<input type="checkbox"/> IN PERSON	
DETAILS OF THE OFFICIAL RECEIVING, ACCEPTING AND REGISTERING THE REPORT	
Name	<input type="text"/>
	(forename, middle name and surname)
Position	<input type="text"/>
Workplace	<input type="text"/>
BULSTAT/UIC	<input type="text"/>

To be completed by the person submitting the report if they are using the form as a template for the report

PART I. DETAILS OF THE PERSON SUBMITTING THE REPORT

Name
 (forename, middle name and surname)

CONTACT DATA

Region

Location

Mailing Address

Telephone e-mail (if available)

I would like to receive a confirmation of the receipt of the report (to be completed only if the report is submitted to the CPDP)

IN THEIR CAPACITY AS	<input type="checkbox"/> a worker, employee, civil servant or any other person performing wage labour, irrespective of the nature of the work, method of payment and source of funding;
	<input type="checkbox"/> a person working without an employment relationship and/or in a self-employed capacity and/or engaged in a craft activity
	<input type="checkbox"/> a volunteer or trainee;
	<input type="checkbox"/> a partner, shareholder, sole owner of the capital, member of a management or control body of a commercial company, member of the audit committee of an enterprise;
	<input type="checkbox"/> a person working for a natural person or a legal entity, their subcontractors or suppliers;
	<input type="checkbox"/> a job applicant who has participated in a competition or any other form of recruitment process and has become aware of a breach in that capacity;
	<input type="checkbox"/> a worker or employee, when the information was obtained under an employment or official relationship that has been terminated by the time of the report submission or the public disclosure
	<input type="checkbox"/> another capacity of the person reporting a breach that they became aware of in a work context ¹ .(please specify).....

PART II. WHOM THE REPORT IS SUBMITTED AGAINST

IDENTIFICATION (in the event of a report against a natural person)	
Name	<input type="text"/> (forename, middle name and surname)

¹ Pursuant to §1, item 4 of the Further Provisions of the Whistleblower Protection Act, a “work context” means current and former work activities in the public or private sector through which, irrespective of their nature, persons obtain information about breaches and within which these persons can be subjected to repressive retaliation if they report such information.

Workplace	
BULSTAT/UIC	<input type="text"/>
IDENTIFICATION (in the event of a report against state or municipal authorities or legal entities)	
Name	<input type="text"/>
BULSTAT/UIC	<input type="text"/>

PART III. DETAILS OF THE BREACH

1. THE BREACH IS RELATED TO (please mark the field where the breach has occurred)	
<input type="checkbox"/>	a breach of Bulgarian law or of European Union acts in the field of:
<input type="checkbox"/>	public procurement;
<input type="checkbox"/>	financial services, products and markets and the prevention of money laundering and terrorist financing;
<input type="checkbox"/>	product safety and compliance;
<input type="checkbox"/>	transport safety;
<input type="checkbox"/>	environmental protection;
<input type="checkbox"/>	radiation protection and nuclear safety;
<input type="checkbox"/>	food and feed safety, animal health and animal welfare;
<input type="checkbox"/>	public health;
<input type="checkbox"/>	consumer protection;
<input type="checkbox"/>	privacy and personal data protection;
<input type="checkbox"/>	network and information system safety;



<input type="checkbox"/>	a breach affecting the financial interests of the European Union under Article 325 of the Treaty on the Functioning of the European Union;
<input type="checkbox"/>	a breach of the rules of the internal market under Article 26(2) of the Treaty on the Functioning of the European Union, including the rules of the European Union and of Bulgarian law on competition and state aid;
<input type="checkbox"/>	a breach related to cross-border tax schemes intended to obtain a tax advantage that contradicts the subject matter or purpose of applicable law in the field of corporate taxation;
<input type="checkbox"/>	a general offence that the person submitting the report became aware of in conjunction with the performance of their work or official duties.
<input type="checkbox"/>	breaches of Bulgarian law in the field of:
<input type="checkbox"/>	the rules for the payment of public state and municipal receivables due;
<input type="checkbox"/>	the labour market legislation;
<input type="checkbox"/>	the legislation related to the performance of civil services.
2. WHEN HAS THE BREACH OCCURRED	
Date/Period	<input type="text"/>
3. DESCRIPTION OF THE BREACH (specific data on the breach or of the genuine risk of the occurrence of such a breach)	
<input type="text"/>	
4. LIST OF THE ATTACHED EVIDENCE	

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PART IV. PERSONS OTHER THAN THE PERSON SUBMITTING THE REPORT WHO NEED PROTECTION
(if known at the time when the report is submitted)

- | | |
|--------------------------|---|
| <input type="checkbox"/> | persons assisting the person submitting the report in the course of the process; |
| <input type="checkbox"/> | persons related to the person submitting the report ² who could be subjected to retaliation as a result of the report; |
| <input type="checkbox"/> | legal entities in which the person submitting the report has an equity participation, for which they are working or to which they are related in any other way in a work context. |

LISTING/IDENTIFICATION OF THE PERSONS TO BE GRANTED PROTECTION

<p align="center">CAPACITY OF THE PERSON <i>(a colleague, a relative – without limitation in degrees, a legal entity in which the person submitting the report has an equity participation, for which they are working or to which they are related in any other way in a work context)</i></p>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>
<p align="center">Name (for natural persons)</p>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div> <p align="center">(forename, middle name and surname, if known)</p>
<p align="center">Name of the legal entity</p>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>

² Under §1, item 9 of the Further Provisions of the Whistleblower Protection Act, “persons related to the whistleblower (person submitting the report)” means third persons who could be subjected to repressive retaliation in a work context, as colleagues or relatives – without limitation in degree.



	BULSTAT/UIC <input type="text"/>
	Represented by <input type="text"/>

CONTACT DATA

Location	<input type="text"/>
Mailing Address	<input type="text"/>
Telephone	<input type="text"/>
E-mail (if any)	<input type="text"/>

PART V. PERSONS WHO CAN CONFIRM THE REPORTED DATA OR CAN PROVIDE FURTHER INFORMATION

Name (for natural persons)	<input type="text"/> (forename, middle name and surname, if known)
Name of the legal entity	<input type="text"/> BULSTAT/UIC <input type="text"/> Represented by <input type="text"/>

CONTACT DATA

Location	<input type="text"/>
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Mailing Address	<input type="text"/>	
Telephone	<input type="text"/>	E-mail (if any)
	<input type="text"/>	<input type="text"/>

THE CURRENT REPORT IS SUBMITTED VIA AN INTERNAL REPORTING CHANNEL:

(to be filled in only when the report is submitted to the CPDP)

YES

NO

INVITATION TO THE PERSON SUBMITTING THE REPORT TO SIGN THE DOCUMENT

(to be marked by the official receiving and registering the report)

ACCEPT

REFUSE

THE REPORT WAS RECEIVED AND REGISTERED BY:

.....
(name of the official)

POSITION:

DATE:

SIGNATURE:

PERSON SUBMITTING THE REPORT/PROXY:

.....
(name)

DATE:

SIGNATURE:

General Information and Completion Instructions:

1. This form is intended for the registration of breach reports via an internal and/or external reporting channel:

- **“Internal reporting of information” (to the obliged entities under Article 12 of the Whistleblower Protection Act³) means verbal or written communication of information about breaches within a legal entity in the private or public sector;**

- **“External reporting of information” (before the CPDP) means verbal or written communication of information about breaches to the competent authorities.**

2. When completing the form that is to be submitted to the CPDP via the external reporting channel, it has to be indicated whether the report is submitted via an internal reporting channel, as well.

3. IMPORTANT! The form is intended for official use related to the registration of a report by the officials designated by the obliged entities, responsible for the reception and registration of such reports. The form can also be used by the persons submitting reports as a template for a report. In this case the person submitting the report only completes Parts I —V (inclusive).

4. The form is also intended for cases of verbal reporting. In such cases the official designated for the reception and registration of reports documents the report by completing the form. After the completion of the form the official invites the person submitting the report to sign it, if they consent to do so, and marks their consent or refusal in the respective part of the form. The signature must be affixed within 7 days of the invitation.

5. Reports are reviewed when submitted by an individual, in person or via a proxy with an express written power of attorney (no notarisation required), via an external reporting channel or an internal reporting channel, or via public disclosure of information about breaches in a work context.

6. When a report is submitted via a proxy, the original copy of the power of attorney under item 4 must be attached.

For the official receiving and registering reports:

7. Obtaining a Unique Identification Number is mandatory when registering reports for the purposes of the internal reporting channel. A UIN is generated at CPDP’s website. In order to obtain a UIN the official responsible for the reception and registration of reports selects the “Obtain a UIN” option and then enters the following information:

³ Obligated entities

Article 12. (*) (1) The obliged entities under this Act shall be the following:

1. employers in the public sector, with the exception of municipalities under Paragraph 2;

2. employers in the private sector with 50 and more workers or employees;

3. employers in the private sector irrespective of the number of their workers or employees if the business activities carried out by them fall within the scope of the legal acts of the European Union specified in Part I-B and Part II of the annex to Article 3(1) and Article 3(3).

(2) Municipalities with a population under 10 000 or less than 50 workers or employees can share resources for the reception of breach reports and follow-up actions on them, provided that they observe the confidentiality obligations.

(3) Obligated entities under Paragraph 1(2) with a total number of workers or employees of 50 to 249 can use a common internal reporting channel, by designating one person or dedicated unit in line with Article 14.

- Name and UIC/BULSTAT of the employer to whom the report was submitted;
- Identification data of the official responsible for the reception and registration of the report;
- Subject matter of the report (respective fields of the breach);
- Method of submission (written or verbal).

8. Within the time frame envisaged by law, the person submitting the report is provided with information about the UIN and the registration date of the report.

9. All submitted reports are registered. The circumstances under items 9—11 of these instructions are considered after the completion of the registration and the obtaining of a UIN.

10. No proceedings are launched for anonymous reports and reports related to breaches occurring more than two years ago.

11. Reports are not examined if they do not fall within the scope of the Whistleblower Protection Act or if their content does not provide convincing reasons to perceive them as plausible.

12. Registered reports containing manifestly false or misleading statements and facts are returned with an instruction to the person submitting the report to make corrections to the statements, reminding them of the liability they bear for false accusations under Article 286 of the Criminal Code.

For the person submitting the report:

13. This form can be used by the persons submitting a report as a template. In this case the person submitting the report only completes Parts I —V (inclusive).

14. Within the statutory time limit after the registration of a report, the person submitting the report is provided with information about the registration of the report and its UIN and date. Any subsequent information or communication related to the report is appended under this UIN.

15. Any new information, or information that was not previously stated in the form at the time of its submission can be provided additionally by the person submitting the report. When it is submitted they must specify the UIN obtained for the initial report.

16. Please, keep in mind that:

- No proceedings are launched for anonymous reports and reports related to breaches occurring more than two years ago.
- Registered reports are not examined if they do not fall within the scope of the Whistleblower Protection Act or if their content does not provide convincing reasons to perceive them as plausible.
- Registered reports containing manifestly false or misleading statement and facts are returned with an instruction to the person submitting the report to make corrections to the statements, reminding them of the liability they bear for false accusations under Article 286 of the Criminal Code.

**THE SUBMISSION OF REPORTS OR THE PUBLIC DISCLOSURE OF FALSE INFORMATION IS
SUBJECT TO ADMINISTRATIVE CRIMINAL LIABILITY UNDER ARTICLE 45 OF THE
WHISTLEBLOWER PROTECTION ACT.**

A handwritten signature in blue ink, consisting of a stylized, cursive letter 'P' with a small mark below it.

Annex No. 3

REPORT REGISTER

№	UIN/ Date of the report	Person receiving the report	Affected person	Summary of the alleged breach				Connection with other reports		Feedback to the person submitting the report		Follow-up action undertaken	Results of the report verification process, including protection provided	Report retention period	Remarks
				Date/Period of the breach	Place where the breach has occurred	Description of the deed	Other circumstances	UIN/Date	Information	Information	Date				

Annex No. 4

Data Protection Clause – Whistleblowers- Team Services BG EOOD

1. The controller of your personal data is Team Services BG EOOD, UIC 205937541, with its headquarters at 9000 Varna, Varna Municipality, Odesos District, 68 Bratya Miladinovi str. Bulgaria.
2. The controller has appointed a Data Protection Officer whom you can contact to obtain detailed information regarding the processing of your personal data at the following email address: dataprotection@promedica24.bg.
3. The data controller may process your personal data and the data of the individuals related to the notification for the necessary purposes, including the receipt of the report and taking subsequent actions (including identifying violations and taking countermeasures based on Article 6(1)(c) of the Regulation (EU) 2016/679).
4. The data controller ensures the confidentiality of your data related to the received notification. Therefore, the data will be accessible only to individuals authorized by the controller to process the data for the purposes specified in point 3.
5. Your personal data may be disclosed to external authorities only in the context of investigative or judicial proceedings conducted by national authorities, in accordance with the authorizing act of such authority and applicable legal provisions.
6. Your personal data will be processed for a period of 5 years.
7. You have the right to request from the data controller access to the content of your data, their correction, deletion, processing restrictions, data portability, and the right to object to the processing of personal data at any time for reasons related to your specific situation.
8. You have the right to lodge a complaint with the supervisory authority responsible for the protection of personal data, namely the Commission for Personal Data Protection, address: Sofia 1592, Prof. Tsvetan Lazarov Blvd. No. 2.
9. Providing data is voluntary.
10. Personal data will not be used for profiling or making automated decisions, and they will not be transferred to third countries.

Data Protection Clause – Whistleblowers- Care Services BG EOOD

1. The controller of your personal data is Care Services BG EOOD, 205937670, with its headquarters at 9000 Varna, Varna Municipality, Odesos District, 68 Bratya Miladinovi str. Bulgaria.
2. The controller has appointed a Data Protection Officer whom you can contact to obtain detailed information regarding the processing of your personal data at the following email address: dataprotection@promedica24.bg.
3. The data controller may process your personal data and the data of the individuals related to the notification for the necessary purposes, including the receipt of the report and taking subsequent actions (including identifying violations and taking countermeasures based on Article 6(1)(c) of the Regulation (EU) 2016/679).
4. The data controller ensures the confidentiality of your data related to the received notification. Therefore, the data will be accessible only to individuals authorized by the controller to process the data for the purposes specified in point 3.
5. Your personal data may be disclosed to external authorities only in the context of investigative or judicial proceedings conducted by national authorities, in accordance with the authorizing act of such authority and applicable legal provisions.
6. Your personal data will be processed for a period of 5 years.
7. You have the right to request from the data controller access to the content of your data, their correction, deletion, processing restrictions, data portability, and the right to object to the processing of personal data at any time for reasons related to your specific situation.
8. You have the right to lodge a complaint with the supervisory authority responsible for the protection of personal data, namely the Commission for Personal Data Protection, address: Sofia 1592, Prof. Tsvetan Lazarov Blvd. No. 2.
9. Providing data is voluntary.
10. Personal data will not be used for profiling or making automated decisions, and they will not be transferred to third countries.