



# **Policy of Channel of Complaints**

**BLUETAB SOLUTIONS, S.L.U.**

**Approved by the Administrative Body of in on on**

**December 22, 2023**

Information important about this document	
Identification of the Procedure	<i>Policy of Channel of Complaints</i>
Section of others policies that develop	None
Standards that replaces	None
Standards that repeals	None
Related standards	<ul style="list-style-type: none"> <li>▪ <i>Policy of Compliance criminal</i></li> <li>▪ <i>Procedimiento de gestión e investigaciones de Denuncias</i></li> </ul>
Department or function to the that affects	All the departments and functions of <i>BLUETAB</i>
Personal to that affects	<i>All Members of the Organization, Business Partners and Suppliers</i> as appropriate.
Responsible main of his surveillance	<i>Responsable del Sistema Interno de Información</i>
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## 1. Definitions

Listed below are the definitions of those concepts (cited in *italics*) that will be frequently used in this document:

- **BLUETAB / the Organization:** BLUETAB Solutions, S.L.U. company dedicated to data architecture and consulting and which is part of the Bluetab Solutions Group, which in turn is part of the International Business Machines (IBM) group.
- **Organ of Administration:** Organ of management social of *BLUETAB* that has assigned the responsibility and fundamental authority of the activities, la governance y the policies of *BLUETAB* and to which the *Senior Management* reports and is accountable.
- **Compliance Officer:** organ internal of *BLUETAB* of character unipersonal that is endowed with autonomous powers of initiative and control, al that is le trust, between others commitments, responsibility of monitor the operation and observance of the *Model of Compliance criminal*. The existence of this organ responds to the requirements established in the Spanish criminal regulations (article 31 bis of the Spanish Criminal Code) regarding the supervision of the *Criminal Compliance Model*.
- **Senior Management:** Management bodies of *BLUETAB* to the extent that they direct and control the *Organization*.
- **Members of the Organization/BLUETAB:** the members of the *Body of Administration*, members of the *Senior Management*, employees, workers or temporary employees or those under a collaboration agreement and the rest of the persons under hierarchical subordination of any of the above.
- **Business Partners and Suppliers:** any person legal or physical, except the *Members of the Organization*, with whom the *Organization* maintains or plans to establish some type of business relationship. By way of example, but not limited to, these include clients, suppliers, intermediaries such as agents or commission agents, external advisors, *joint-Ventures* and, in general, natural or legal persons contracted by *BLUETAB* for the delivery of goods or provision of services.
- **Third:** Natural or legal person outside the *Organization* or independent body that relates to it.
- **Interested parties:** for the purposes of the *Criminal Compliance Model*, this group includes natural or legal persons who, not being *Business Partners and Suppliers*, nor

*Members of the Organization*, may be affected or perceive themselves as affected by a decision or activity of the *Organization*.

- **BCG o NCC: Business Conduct Guidelines o Normas de Conducta Comercial.** Documento de IBM al que se ha adherido *BLUETAB* que recoge los principales valores de la Organización, y cuyo principal objetivo es garantizar que las acciones y relaciones con sus clientes, inversores o resto de *Miembros de la Organización* se basen en dichos valores.
- **Criminal Compliance Model:** A system of organization and management for crime prevention, whose objective is the prevention, detection, and management of criminal risks through its integration into business processes, as well as measurement for continuous improvement. Its essential basis is represented in the *Criminal Compliance Policy and the Crime Prevention and Response Manual*.
- **Policy of Compliance criminal:** document that reflects the commitment of compliance of the Governing Body and the Senior Management of *BLUETAB*, as well as the main strategic objectives of the Organization in this matter, including its determination not to tolerate within itself any conduct that may constitute a crime.
- **Manual of Prevention and Response before Crimes:** document that has its protection in this Policy and includes the measures designed to evaluate, prevent, detect and manage early *Criminal risks*.
- **Standards:** Set of texts that collect the criminal Compliance obligations (both internal and external) that are applicable to the *Organization*.
- **Whistleblowing Channel Policy:** set of provisions contained in this document, hereinafter also referred to as "**Policy**".
- **Procedure of management e investigation of complaints:** document that establishes the mechanisms necessary for the communication and management manner early of any violation, so as the procedures necessary for the processing internal of *Complaints and Inquiries*, and internal processing and investigation of those *Complaints* or any known circumstance that should be investigated.
- **Criminal risk:** risk related to the development of conduct that could constitute a crime for which *BLUETAB* could be investigated, according to the criminal liability regime of legal entities established in the Spanish Penal Code.
- **Communication:** Statement raising a question about the scope, interpretation or compliance with the regulations applicable to *BLUETAB*. Depending on

of your content, a communication can contain a *Complaint*, a *Query* or a *Complaint*.

- **Complaint/Concern:** Communication by which any Member of the Organization communicates any concern, unfair situation or decisions of the Organization that affects your sphere personal and that are communicated through of *Channel of Concerns*.
- **Query:** communication by which any Member of the Organization requests a clarification, response or criterion on the scope, interpretation or compliance with the regulations applicable to *BLUETAB*.
- **Complaint:** communication relating to a possible *Non-compliance* of a normative applicable to *BLUETAB*.
- **Whistleblowing Channel:** platform that ensures direct, confidential and secure communication of *Queries and Complaints* both by part of the Members of the Organization, Business Partners or Third parties.
- **Channel of concerns:** middle of communication position to disposition of the Members of the Organization so that they can communicate any *Complaint or Concern*.
- **Internal Information System:** measures adopted in accordance with Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption (or also referred to as the Informant Protection Law) for the management of communications relating to violations of the regulations referred to in said text.
- **Head of the Internal Information System:** *BLUETAB* has appointed the head of the People and Culture Department as Head of the Internal Information System, having the same management status, being entrusted with the functions of management of the Internal Information System and processing of investigation files in the capacity of notifying the Independent Authority for the Protection of Informants (IAIP) of their appointment.
- **Informant:** person physical or legal that files a *Complaint*. The figure of the Informant includes:
  - *Members of the Organization:* includes workers whose employment relationship is current, has ended or has not begun, shareholders and people belonging to the Governing Bodies, paid or unpaid volunteers and interns.

- *Business Partners and Suppliers*, as well as any person working under their supervision and direction. Subjects or legal entities external to *the Organization*, with the that is has or poses set a relationship commercial, as well as any person who works under their supervision and direction.
- *Third parties* and others individuals such as, by example, representatives union representatives.
- Any person, physical or legal, with a lace present or future, in the previous contexts.
- **Reported:** natural or legal person or persons linked to the *Breaches reported*, as authors, participants and even cover-ups. They can be identified in the *Communication or be* specified throughout the process of their management.
- **Parties interested relevant:** this figure includes, between others, a:
  - Witnesses, u others people who are involved in la *Query or Complaint*.
  - Researchers.
  - Family members, representatives union members, and others people that support *the Informant*.
  - Those of the that are obtain the information that motivated the interposition of a *Complaint*.
- **Retaliation:** Any action or omission, whether attempted, threatened or actual, direct or indirect, of the that may be detach a harm or disadvantage, for the *Informant or other Relevant stakeholders, in the workplace or professionally*, solely because of their status in relation to *the Complaint* or for having made a public revelation.
- **Non-compliance:** behavior, active or passive, that constitutes a violation of the regulations applicable to *BLUETAB*. A *Non-compliance*, depending on its severity, may range from to the mere *Non-compliance* formal of a requirement included in an norm internal, until the commission of acts constituting a crime potentially attributable to the *Organization*.
- **Notification:** action of informing the parties involved in the procedure, in order to guarantee its correct development and respect for their rights.
- **Log-Book of information: system** a through of which that will keep the evidence of the information received and the internal investigations to which it has given rise, guaranteeing, in all cases, the confidentiality requirements.

- ***Good Faith Report: Complaint*** made pursuant to the provisions of this Procedure *and based on* facts or indicia from which it is reasonably possible to infer the existence of a Non-compliance *of the* legislation in force or of the internal regulations. It is considers that *the Complaint* es of good fe when the itself is performs without indignity of revenge or of causing a labor injury or professional to *Defendant or* to a *Third Party*.
- ***Independent Whistleblower Protection Authority (IWA)***: an independent administrative authority, as a state-level public law entity, which will act in the fulfillment of its primary function of protecting *whistleblowers*. Among its other functions a stand out, is finds the management of its own channel external, the processing of sanctioning procedures and the imposition of sanctions, among others.



## **2. Purpose of the *Policy of Channel of Complaints***

This *BLUETAB Whistleblowing Channel Policy*, approved by its *Government Body*, aims to specify the criteria for the use and management of the different communication channels existing in *BLUETAB* through which the Members of the *Organization, Business Partners and Suppliers and Third Parties* can submit *Concerns, Queries and/or Complaints* about potential *Non-compliances* that may arise within the *Organization* in the development of its activities.

On line with lo set on la *Policy of Compliance criminal of BLUETAB*, on this document details the different channels that can to such effects, that go from the simple report to the hierarchical superior until communication through the *Complaints Channel* of *BLUETAB*.

All *BLUETAB Members* are required to report any individual or collective conduct or circumstances that may arise in the context of their activities in *BLUETAB* and *that* may constitute a violation of the content of herein text or any other documents that make up the *Model of Compliance criminal of BLUETAB*, with regardless of whether such behaviors have been ordered or requested by a superior.

### 3. Scope of application

#### 3.1. Scope of application

This *Policy* is binding and directly applicable to all *Members of the Organization*, regardless of their position and function.

In this sense, this *Policy* binds any person who intends to report a possible *Non-Compliance in a professional context with BLUETAB*. Likewise, binds the the persons who, even if they are *not Members of the Organization*, have knowledge of the existence of any *Breach in your relationship professional with BLUETAB as, Business Partners y Suppliers or Third Parties*.

#### 3.2. Activities affected

The range of the present *Policy* covers to all the *Complaints, Queries and Complaints* that may be raised by any Member of *the Organization, Business Partners and Suppliers and Third parties*. The *Communications* received may relate to any *Non-compliance with legal regulations* that the *Informant believes* may be applicable to *BLUETAB*, as well as any document that makes up the *Criminal Compliance Model*.

## 4. Channels of communication

In order for this Policy to *be effectively* applied, BLUETAB makes *available* to Business Partners and Suppliers and Third Parties different internal channels so that they can process any type of Communication related to possible Non-Compliances.

In particular, *BLUETAB* has the following channels for communicating Complaints, Queries and Complaints of practices contrary to the values or internal regulations of *BLUETAB*:

- Communications **written**:
  - To through of mail electronic directed to *Responsible of system internal of information*:  
  
[canal.preocupaciones@bluetab.net](mailto:canal.preocupaciones@bluetab.net)
  - To through of a form electronic on on next link:  
  
Channel of Complaints of BLUETAB
  - By mail postcard to:  
  
To the attention of the responsible of Department of People  
Department of BLUETAB  
Ruiz Picasso Building, Pl. Pablo Ruiz Picasso, 11, 2nd Floor,  
Tetuán, 28020 Madrid
- Communications **oral**:
  - To through of upper hierarchical
  - To through of Responsible of other department.
  - To through of *Compliance Officer*.
- In-person **meeting** with *the Internal Information System Manager* within a maximum of seven (7) days from the request.

In any case, in *Verbal Communications* will be previously warned to Informant *of the* recording of the communication or its transcription and you will be informed of the processing of your data in accordance with the provisions regarding the protection of personal data.

Regardless of of means of communication used, the Informant *may designate* a means of communication preferential for receive information about the state of your Complaint *or putting* in contact with the same to request additional information and/or clarification.

*Communications made* through the aforementioned channels will be kept on a durable, secure and accessible medium, such as, for example, a recording or a complete and accurate transcription.

Likewise, for the communication of *Complaints or Concerns* that personally affect *the Members of the Organization*, BLUETAB has a *Concerns Channel* accessible through the following communication channels:

- To through of mail electronic: [channel.concerns@bluetab.net](mailto:channel.concerns@bluetab.net)
- To through of a form electronic: *Channel of concerns* of BLUETAB \_\_\_\_\_
- To through of the upper hierarchical.

The confidentiality guarantee covering the *Communications* received by any of the above means will be extended to the Communications *that are sent* through any other means and/or to persons other than those provided for herein. Likewise, when the *Communication is* sent by channels that not be the *Channel of Complaints* of *la Organization* or to staff that not be the *Responsible of the System Internal of Information*, los subjects recipients of *la information* are obliged to send the information received immediately to *the Person in Charge of the Internal Information System* as the *Person in Charge of the Complaints Channel*.

In addition, *BLUETAB* informs possible *Informants who also have* external channels of information before the authorities competent and, where appropriate, where applicable, before the the institutions, bodies and agencies of the European Union, such as, inter alia:

- En materia de defensa a la competencia: [Denuncia de conducta prohibida | CNMC](#)
- En materia de infracciones tributarias: [Agencia Tributaria: Denuncias](#)
- If it involves subsidies or fraud involving European funds: Anti-fraud mailbox - [Reporting channel of the Recovery and Resilience Facility | Recovery, Transformation, and Resilience Plan, Government of Spain. \(planderecuperacion.gob.es\)](#)
- National Anti-Fraud Coordination Service: [IGAE: National Coordination Service Anti-Fraud \(hacienda.gob.es\)](#)

Likewise, the *Organization* informs potential *Informants of the existence* of a public body called *Independent Authority for the Protection of Informants, A.A.I.*

Although, the use of internal channels mentioned as the preferred channel of communication is recommended.

If during the development of it arranged in the present *Policy and in the Procedure of management and investigation of Complaints* indications are detected that the reported facts may constitute a criminal offense, these must be immediately referred to the Public Prosecutor's Office or the European Public Prosecutor's Office, as appropriate.

## 5. Principles and guarantees of *System Internal of Information*

With regard to *Communications made* by Members of the Organization, Business Partners and Suppliers and Third Parties, BLUETAB guarantees the absence of retaliation for those *Communications* made in good faith or by those actions tending to avoid participate in illegal activities.

In all case, the management of *System Internal of Information* will be guided, at all moment, by the following three general principles:

- **Confidentiality Principle:** The confidentiality of the identity of the Informant and the *Reported Party*, as well as any other relevant Interested *Party affected by the Complaint*, will be *guaranteed*.

In this sense, everyone participating in the investigations must maintain the confidentiality of the information received or known. And therefore, it cannot disclose to third parties the information known in the exercise of its functions, in especially that relating to personal data.

The exception to the previous paragraph has to do with the need to share information with the people involved in the case respecting *the principle of need of know* in those cases where it is strictly necessary.

- **Principle of objectivity:** not only the facts and circumstances that establish and aggravate the responsibility of the subject of the Complaint, *but* also the that exempt him from it or extinguish or attenuate it.
- **Principle of impartiality:** Complaints *and any* subsequent investigations will be handled by appointing individuals who have no connection to the affected activities or businesses. Likewise, will ensure that not have no relationship with persons affected, to margin of the strictly professional. It is understood that there is a relationship that transcends the professional if it is known *in BLUETAB* the existence of a friendship or personal relationship that exceeds the professional relationship, which could violate the required impartiality.
- **Trust Principle:** BLUETAB *will* handle any reported *Non-compliance* in an appropriate, serious and objective manner. It will also manage them efficiently and transparently, avoiding, in any case, violating the principle of impartiality, as well as independence and autonomy.

- **Principle of subsidiarity or latest ratio:** if use can use a channel of communication less harmful for the Reported, *BLUETAB will fall back* to to option less invasive taking into account the circumstances of the case.

Notwithstanding the foregoing, *BLUETAB may* adopt, with respect to the corresponding regulatory guarantees, immediate and precautionary measures until the appropriate resolution of the fact in question. Once the file has been developed, the measures may be continued or interrupted.

- **Principle of adequacy and sufficiency:** *BLUETAB* will assign to the resolution of the case all the means that are considered adequate and sufficient to fulfill the purposes of the investigation, taking into account the circumstances of the case, of manner that exists traceability of the process of deliberation *adopted by the* Organization, in a manner that may be able of justifying the measure to any *Third Party*.
- **Prohibition of Retaliation:** *BLUETAB* does not tolerate *any Retaliation* , regardless of whether it occurs in the workplace or personally, against anyone who, in good faith, reports facts that could constitute *a Default* according to to it provided by this *Policy*.

The *Informant* may request the protection of the *Authority Independent of Protection of the Informant*. This protection will be also of application al *Reported and* to any other *Party interested relevant in the* process of *Complaint as*, by example, a family member or a companion who supports you.

The guaranteed protection may be extended to the *Relevant interested parties*, including, but not limited to, colleagues or family members.

- **Principle of proportionality:** this principle responds to the need of that the sanction is adjusted to the seriousness of the facts, avoiding this being an arbitrary or disproportionate measure. For these purposes, the following principles will be considered:
  - Appropriateness: sanctions must be adequate to end that justify.
  - Sufficiency: sanctions must be sufficient for the end that they chase.
  - Due to process: every person has right a be heard and a make a ssert the ir legitimate claims against those in charge of the investigation.
  - Presumption of innocence: is the right of all subject of the *Complaint*, to be treated as if was innocent, until that, in your case, proceed the imposition of a sanction.

## 6. Rights of *Informant* and of *Reported*

### 6.1. Rights of *Informant*

The rights of *Informant* are the following:

- **Right to confidentiality:** The identity of the *Informant* will *not be revealed* without his or her express consent to any person other than an authorized member under the terms described in this *Policy*. This also applies to any information that may allow the identity of the *Informant* to be *deduced*. However, it should be noted that the identity of *the Informant* may be revealed when this is an obligation in the context of a judicial process. In the latter case, the consent of the *Informant* is *not required* to reveal their data, but only prior notice.
- **Right of indemnity:** s must ensure the absence of any form of *Retaliation against* the *Informant* by the made of having filed a *Complaint*, provided that is *a Complaint in good faith*, including both threats and attempts. For these purposes, are considered *Retaliation* those established in the legislation current. These guarantees of protection for *the Informant* also extend to the *Relevant Interested Persons in the Reporting process who could* suffer negative consequences as a result (including, but not limited to, witnesses, colleagues or family members *of the Informant* or legal persons for the that works or maintains a relationship in a context work the *Informant*).

### 6.2. Rights of *Renounced*

The rights of *Denounced* are the following:

- **Right to avoid damage to the reputation of *the Reported* party:** The rights of the affected person must be protected to avoid damage to the reputation u a other consequences negative, preserving his right of presumption of innocence during all the process of research.
- **Right to confidentiality of the identity of the *Defendant and*** that his or her identity be protected throughout the procedure.
- **Right of defense:** The accused's rights of defense must be guaranteed, *including* the right of access to the file, the right to know the status of the proceedings, the right to be heard, and the right to effective judicial protection against a decision that concerns him or her in the context of subsequent investigations or judicial proceedings.
- **Right to information, hearing process and access to the file: the *Defendant* must be** guaranteed timely *knowledge* of the actions or omissions that are being committed against him/her.



attribute and to be heard at any moment from the knowledge of the facts with those related to it.

- **Right to the presumption of innocence and to honor as an affected subject:** any accused must be treated as if he were innocent, until that, if case, a sanction is imposed .

Regarding the right of access to the file, it should be noted that its exercise must respect the right of confidentiality of *Informant*, as well as of the rest of people who have intervened in the investigation procedure, for example, as witnesses. Therefore, it must be guaranteed *that the Defendant* does not access documents, recordings or other media in which natural persons involved in the investigation process are identified and/or statements or accounts of facts that they have made. Access must be guaranteed by part of the *Reported to* a summary of the facts investigated, a the diligences carried out (with the limitations indicated above), and to the resolution, including the reasons that justify it.

Likewise, in case of not meet evidence of *Noncompliance* and that the *Complaint* has been imposed in bad faith, *the Respondent* has the possibility of requesting *the Organization* to consider imposing corrective measures for the *Informant*.

## 7. Roles and responsibilities

The *Administrative Body of BLUETAB* has appointed the head of the Department of People and Culture as Responsible for the internal Information System in accordance with the provisions of this Policy.

### 7.1. Responsibilities of Responsible of System internal of Information

The roles and responsibilities of the *Internal Information System Manager* in relation to the *Queries and Complaints* received are as follows:

- Reception of all *Complaints, Queries and Complaints* received through the communication channels detailed in section 4 of this *Policy*.
- Keep a record of the documentary traceability of the *Complaints* in the *Information logbook*, as well as of the rest of the documentary evidence.
- Analysis of the communications remitted with rigor, independence, autonomy, objectivity and confidentiality.
- Communicate to the *Administrative Body* any *Non-compliance* with the regulations applicable to BLUETAB of any that is known to that may generate criminal liability for the *Organization*.
- Execute the *Complaint management and investigation procedure* from receipt of the *Complaint* until its resolution.
- Maintain a contact constant and fluid with the *Informant* during the processing of su *Complaint, Inquiry or Complaint*.
- Issuance of report of investigation and conclusions about the *Complaint*.

### 7.2. Responsibilities of Body of Administration

The roles and responsibilities of *Organ of Administration* in relationship with the *Complaints, Queries and Complaints* received are next:

- Formally approve this *Policy*, as well as any modifications or updates required to maintain its validity and effectiveness.
- The *Administrative Body* is responsible for adopting the pertinent decisions regarding the *Complaints* about facts that may generate criminal liability for BLUETAB, once it has received the investigation report and conclusions of the *Complaint*, prepared by the *Internal Information System Manager*.

- The *Body of Administration* will *inform to Responsible of System internal of Information* of the agreed actions, so that they are properly documented and recorded.

## 8. Complaints of bad fe

The protection and support provided by *the Organization* will be subject to *the Informant* having filed the *Complaint* acting in good faith.

The *Informant* must have reasonable grounds to believe, in light of the circumstances and the information available to him/her , that the the facts that he/she is reporting are true. In this sense, the good faith suppose report having, at less, reasonable reasonable reasonable to believe that the information, about a *possible Default*, communicated was true at the time of reporting.

Those who communicate, deliberately and consciously, information incorrect or misleading will not enjoy support and protection by the *Organization*. In addition, *BLUETAB* will analyze each specific case in order to impose proportionate disciplinary measures against *the Members of the Organization* or business front to *Business Partners y Suppliers y Third parties* filing a *Communication in bad faith*.

## **9. Knowledge and diffusion of the present *Policy***

The present *Policy* is delivered and is to disposition of all the *Members of the Organization* in [include link a page web / intranet / portal del employee].

Likewise, *BLUETAB* will put the present *Policy* a provision of your *Business Partners and Suppliers and Third Parties* through [include link to website].

## 10. Protection of data personal

*BLUETAB* will process the data received through *the Complaints Channel* and other communication channels in accordance with current data protection regulations. The processing of personal data will be for the purpose of managing and resolving *any Complaint, Inquiry, or Report*, as well as to analyze the criticality of the reported events, conduct an investigation into *potential breaches*, adopt the necessary precautionary measures, and, if necessary, initiate the appropriate internal or legal actions.

In order to fulfill these purposes, certain personal data and information must be collected, either directly through the Informant, *through* the person/s determined by the Organization *or through* authorized *Third Parties* specifically contracted for such purposes, who will guarantee the highest level of confidentiality and technical security.

All Members *of the Organization* are obliged, and especially in the *Whistleblowing Channel*, to provide information that is their own, true, truthful and lawful, being the only ones responsible for the false demonstrations or inaccurate information provided, as well as as of the consequences internal, administrative and/or legal that may apply.

The *Organization* will ensure in all cases that the different communication channels constitute a secure medium, equipped with the measures required by the regulations on the Protection of Personal Data and information security.

### 10.1. Conservation of the information

*BLUETAB* will process, manage and store the information and personal data contained in the *Complaints*, investigations, reports and other documentation in accordance with the deadlines established in the current regulations on data protection and other applicable regulations. This information will also be safeguarded by the *Internal Information System Manager* and will be deleted, blocked, or anonymized after the legally established deadlines have expired.