



Whistleblower report

Vias institute

The Whistleblowing Act of 28 November 2022 requires companies such as Vias institute to establish an "internal reporting channel" so that any breaches of certain Belgian and European legislation can be detected and dealt with at an early stage.

Whistleblower report

If you are aware of potentially unacceptable behaviour within Vias institute, you can report it via our internal reporting channel [Whistleblower Software](#).

You will enjoy "whistleblower" protection if your report concerns a breach of legislation in any of the following areas: public procurement; financial services; products and markets; prevention of money laundering and terrorist financing; product safety and product compliance; transport safety; consumer protection; protection of privacy and personal data; combating tax fraud and social fraud. Furthermore, the Whistleblowers Act also provides protection for reports when there are infringements affecting the financial interests of the European Union, and there is also protection when reporting infringements related to the internal market, including infringements of Union rules on competition and state aid. The internal reporting channel is not intended to be used to contest business, research-related and/or financial decisions of Vias institute.

[Whistleblower Software](#) is a platform developed specifically to allow whistleblowers to make reports in a secure and confidential environment in accordance with the Whistleblower Act. The platform also allows you to make anonymous reports. When you make a report, you will receive an acknowledgement of receipt within seven days. We will then thoroughly and impartially investigate your report and - in principle - follow up with you within three months.

Vias institute attaches great importance to the confidentiality of whistleblowers, concerned persons, and other persons providing information in the course of the investigation. The identity of such persons will therefore not be disclosed to anyone other than authorised staff members responsible for receiving or following up reports without their free and express consent.

Processing of personal data

To enable the receipt of reports and the subsequent investigation, we will process personal data of (i) the whistleblower who has not chosen to report anonymously, (ii) the persons involved, and (iii) other persons who may contribute to the investigation or are mentioned during the investigation.

The categories of personal data we process under internal reporting procedures depend on the information provided by the whistleblower and collected during the investigation. This information may include your name, position, contact details, relationship with us, experience,

misconduct, criminal offences, sanctions and so on. We cannot exclude that this information may also relate to special categories of personal data, such as information that may reveal racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, or data about your health or sexual orientation.

We process your personal data to follow up internal reports, to investigate, and if necessary, to take appropriate action to address identified unacceptable behaviour within Vias institute. For these processing operations, we rely on our legitimate interest to efficiently fulfil our legal obligations arising from the Whistleblower Act, namely to provide for an internal reporting procedure and to thoroughly deal with the reports made there. We will also process your personal data to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities and government agencies or bodies, including competent data protection authorities, to the extent necessary to fulfil our legal obligations. In addition, we may also share your personal data with the competent authorities on our own initiative if there are justified suspicions that you are involved or aware of an unlawful act or crime. To process your personal data for this purpose, we invoke our legitimate interest to help competent authorities prevent or investigate illegal activities. We also invoke our legitimate interests when we process your personal data to exercise our rights of defence, to pursue the defence of our legitimate interests or rights, and to act in the context of legal proceedings.

In cases where we would process special categories of personal data about you, we only do so where such processing is necessary on the basis of an overriding public interest or to comply with specific legal obligations, where you have manifestly disclosed the personal data, or where the processing is necessary for the establishment, exercise or substantiation of legal claims.

Under the Whistleblower Act, we are required to keep a record of all reports we receive. We keep the reports as well as all related information, including investigation reports and supporting information, at least until the reported breach is time-barred and at least as long as our contractual relationship with the whistleblower runs. This basically means that we keep all information for at least five years until after the end of the investigation. However, data may need to be kept longer in the context of a judicial investigation or proceedings.

For more information on how we process personal data and on data subjects' rights in relation to such processing, please refer to the privacy statement on our website (<https://www.vias.be/nl/privacy-policy/>).

Contact

If you have additional questions about how we process your personal data in connection with notifications, please contact our data protection officer by email at dpo@vias.be.

For all your other questions on whistleblowing, please contact hri@vias.be.