

Data Privacy Notice for JBC Integrity Helpline

Information JBC Collects

When submitting a report through the Integrity Helpline, you may provide:

- A description of the incident or concern.
- Evidence supporting your report.
- Contact information (optional).
- Information about individuals involved in the report.

If you choose to remain anonymous, JBC offers a secure communication platform to facilitate follow-up queries and provide updates without compromising your identity.

Purpose of Collecting

JBC collects and processes Personal Data to:

1. Conduct a thorough investigation of your report.
2. Assess compliance with internal policies, Jordanian laws, and applicable regulations.
3. Address ethical and legal concerns as part of JBC's obligations.

Basis for Data Processing

JBC processes Personal Data submitted through the Integrity Helpline to address potential misconduct within the organization. This processing aligns with the Jordanian Personal Data Protection Law No. (24) of 2023 (PDPL) and is based on JBC's legitimate interest in maintaining ethical and legal compliance while ensuring a safe and fair workplace environment.

All definitions, provisions, and bylaws of the PDPL govern the processing of your Personal Data under this Notice.

How JBC Protects Your Information

JBC is committed to safeguarding your Personal Data by:

- Restricting access to authorized personnel only.
- Ensuring confidentiality throughout all stages of the investigation.
- Limiting data collection to what is strictly necessary for the investigation.

Data Storage Method and Duration

In compliance with PDPL, JBC securely stores your Personal Data at a dedicated hosting server maintained by Reforge Digital, which is the same company is managing JBC's integrity helpline.

Data will be retained for the duration of the investigation and any additional time required to fulfill the purpose of collection and processing. After this period, your Data will be securely disposed of.

Confidentiality

Your Personal Data processed through the Integrity Helpline is treated as confidential. JBC and its Data Processor are obligated to maintain your Data confidentiality and integrity and prevent unauthorized alterations.

Your Rights

Under the PDPL, you are entitled to:

1. Be informed, access, and obtain the Data held by JBC.
2. Withdraw prior consent.
3. Correct, amend, add to, or update your Data.
4. Restrict Data processing to a specific scope.
5. Request deletion or concealment of Data in accordance with the law.
6. Object to processing or profiling if unnecessary for the original purposes, excessive, discriminatory, unjust, or unlawful.
7. Transfer a copy of your Data to another responsible entity.
8. Be informed of any breach or compromise affecting the security and integrity of your Data.

Use of Third-Party Data Processors

JBC contracts Reforge Digital as a solution provider for Integrity Helpline services. Reforge Digital processes Data on JBC's behalf under strict confidentiality and security measures.

Email address: Info@reforgedigital.com

Privacy Policy Updates

JBC reserves the right to amend this Data Privacy Notice at any time. You will be notified of any significant changes affecting the notice.

How to Contact JBC

For questions regarding this Privacy Notice or the Integrity Helpline process, please contact: compliance.claims@jordanbromine.com

Acknowledgment

By providing your Personal Data, you grant your explicit prior consent electronically to collect, store, use and process the Data.