

# In Case of Emergency (ICE) Contact Policy

Artur Placha, IT & Security Director  
Lingaro

Version 1.0  
Introduced 11/10/2024  
Last updated 11/10/2024

## **About this Policy**

### **Scope**

This Policy applies to ICE Contact phone numbers (ICE Number) provided by Lingaro staff members and processed by Lingaro Group.

### **Policy Statement**

This policy governs the rules of collection, secure storage and use of In Case of Emergency (ICE) contact details provided to Lingaro Group by Staff Members. In particular, it specifies privacy protection arrangements, access restrictions and governance of use of these numbers in accordance with their stated purpose.

The purposes of collecting the ICE Numbers are:

1. To enable Lingaro to ensure the wellbeing of Staff Members in emergency situations
2. To enable Lingaro to better manage business continuity disruption situations arising from lack of contact with Staff Members where there is reason to believe lack of contact may be due to an emergency on their part

### **Collection of ICE Numbers**

ICE Numbers may be provided by all Lingaro Staff Members.

Providing an ICE Number is not mandatory for Staff Members.

The ICE Number should enable Lingaro Group to reach a person trusted by the Staff Member in case of an emergency.

Staff Members are asked to notify the person whose number they're providing that they are doing so, and to provide means for that person to learn of their relevant privacy rights by reading this Policy.

Staff Members may update or withdraw the ICE Number at any time.

Rules governing collection, processing and use of ICE Numbers are publicly available for viewing.

### **Secure storage and processing of ICE Numbers**

ICE Numbers are tied to the Staff Member's profile and kept in Lingaro Group staff directory system.

The IT system storing and processing ICE Numbers is secured against unauthorized access in line with industry best practice. In particular, it is protected in accordance with requirements set out in OWASP ASVS and ISO 27001 Standards.

Access to ICE Numbers is restricted. Aside from the Staff Member providing the ICE Number, only members of the following teams may directly access the ICE Numbers stored in the IT system:

- HR Director who owns the Company Directory IT System, or their deputy
- HR Staff Team which operates the Company Directory IT System
- IT Business Applications team developing the Company Directory IT System which stores ICE Numbers, only in connection with required system development and maintenance tasks

## **Use of ICE Numbers**

ICE Numbers may be used in the following emergency situations:

1. When a Lingaro Group Staff Member has a medical emergency or accident at work and is unable to notify their close ones, or relevant information about their health is urgently required (e.g. blood type, allergies, medication, etc.)
2. When Lingaro Group is unable to contact a Staff Member through any other channels to ensure their wellbeing during a natural disaster or other serious crisis situation
3. When Lingaro Group is unable to reach a Staff Member who did not report to work without any prior notice and is not responding to multiple direct contact attempts (as this could be a result of them being involved in an emergency situation affecting their wellbeing)

Request to use the ICE Number must be submitted in writing to the HR Staff department. It must clearly describe the emergency situation justifying the use of the ICE Number, as well as prior contact attempts if any have been made. In exceptional time-sensitive cases (e.g. on-going medical response), the request may be processed without written format, but must subsequently be documented in writing as soon as possible.

HR Staff Team provides the ICE Number only if they determine it to be necessary and in the interest of wellbeing of the Staff Member.

The Staff Member receiving the ICE Number is obligated to:

- reach out to the owner of the ICE Number and clearly describe the emergency situation which called for its use
- only use the number in connection with that situation
- remove it from their device(s) as soon as the emergency situation is resolved

## **Retention of ICE Numbers**

ICE Numbers are retained by Lingaro until they are:

- Changed or removed by the Staff Member providing the ICE Number

- Removed from the Staff Member's profile in the Company Directory IT System upon termination of employment or cooperation with Lingaro Group.

## Privacy Notice

Pursuant to Article 13 (1) and (2) of the Regulation of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter: "GDPR"), we inform you that:

1. We received your phone number from our employee/contractor to contact you in cases of emergencies. The Controller of your personal data is a company from the Lingaro group, where the person who provided us with your data either works or collaborates (list below).

- Poland:
  - Lingaro sp. z o.o. Warsaw (Puławska 180, 02-670 Warsaw, Poland)
  - Lingaro Group sp. z o.o. Warsaw (Puławska 180, 02-670 Warsaw, Poland)
  - Lingaro Ecommerce sp. z o.o. Warsaw (Puławska 180, 02-670 Warsaw, Poland)
  - Lingaro Services sp. z o.o. Warsaw (Puławska 180, 02-670 Warsaw, Poland)
  - Lingaro Digital Commerce sp. z o.o. Warsaw (Puławska 180, 02-670 Warsaw, Poland)
- India
  - Lingaro India Private Limited F-205, Hiline Complex Road No 12 Banjara Hills, Hyderabad, Telangana - 500034
- Philippines
  - Lingaro Philippines, Inc. 41F Philamlife Tower, 8767 Paseo de Roxas, Makati City, 1226, Philippines
- USA
  - Lingaro US, INC. 201 E Fifth St Suite 1900, Cincinnati, OH 45202, USA
  - ORBA Co. 10816 Millington Ct, Ste 116. Blue Ash, OH, 45242
- Mexico
  - Lingaro MEXICO" S. de R.L. de C.V, Calle Obrero Mundial number exterior 644, interior floor 2 office 201, Colonia Atenor Salas, Benito Juarez, Zip Code 03010 in Mexico City
- Switzerland
  - Lingaro Switzerland Sàrl, Creative Space, Luegislandstrasse 105, 8051 Zürich, Schweiz (Switzerland)
  - eBusiness Holding SA, Rue de Lausanne 36, 1201 Genève, Switzerland
  - Lingaro Western Europe Sàrl, Rue de Lausanne 36, 1201 Genève, Switzerland
- Singapore
  - Lingaro Singapore PTE. Ltd.33 Ubi Avenue, #08-13, Vertex, Singapore
- United Kingdom
  - Lingaro Britain, St. Martin's Court, 10 Paternoster Row, London, United Kingdom, EC4M7EJ

2. The Controller has appointed a data protection officer, who can be contacted via e-mail: **privacy@lingarogroup.com** on any matter concerning the processing of personal data. The data protection officer may also be contacted in writing at the Controller's registered office address indicated in section 1, with the reference "data protection officer".

3. Your personal data in the form of your phone number will be processed for the following purposes:

- a) In the event of a serious medical emergency or accident at work involving our employee/contractor, where they are unable to notify you themselves; the legal basis is the Controller's legitimate interest (Article 6(1)(f) GDPR) in ensuring the health and safety of staff and business continuity.
- b) If we need to check on the wellbeing of our employee/contractor and are unable to reach them during a natural disaster or other serious crisis; the legal basis is the Controller's legitimate interest (Article 6(1)(f) GDPR) in ensuring the safety of staff and business continuity.
- c) If we need to check on the wellbeing of our employee/contractor when they do not report to work without prior notice and are not responding to multiple contact attempts (as this could be due to a medical emergency at home); the legal basis is the Controller's legitimate interest (Article 6(1)(f) GDPR) in ensuring the safety of staff and business continuity.

4. Your personal data will be processed for the period of employment/cooperation of the person who provided us with your personal data.

5. Your personal data may be shared with entities providing services to the Controller, in particular IT service providers, as well as entities to which the Controller is obliged to provide data under applicable law.

6. Your personal data may also be shared with entities belonging to the Lingaro Group. The basis for sharing your personal data is the Controller's legitimate interest (Article 6(1)(f) GDPR) of organizational management in the Lingaro Group.

7. Your personal data may be transferred to entities outside the European Union or the European Economic Area. If recipients are located in countries that do not provide adequate protection for personal data, we will take all necessary measures to ensure that the transfer of this data outside the EEA is appropriately safeguarded in accordance with applicable data protection laws. This includes implementing appropriate safeguards, such as the EU Standard Contractual Clauses for Data Protection. For detailed information regarding these safeguards, please contact us as outlined in point 2 above.

8. You have the right to access to your data, the right to obtain a copy of it, to request rectification, deletion and restriction of processing. The request should be submitted to the address: [privacy@lingarogroup.com](mailto:privacy@lingarogroup.com).

9. As your personal data is processed on the basis of the legitimate interests of the Controller, you have the right to object to the processing. The objection should be submitted to the address: [privacy@lingarogroup.com](mailto:privacy@lingarogroup.com).

10. You have the right to lodge a complaint to the President of the Personal Data Protection Office (Stawki 2, 00-193 Warsaw, tel. 22 531 03 00, fax. 22 531 03 01, [www.uodo.gov.pl](http://www.uodo.gov.pl)) if you consider that the processing of your personal data violates the provisions of the GDPR or other regulations determining the manner of processing and protection of personal data.

11. Your personal data will not be subject to profiling. The provision of your personal data is voluntary, but necessary to fulfill the purposes indicated in point. 3.