

Whistleblowing application SD Whistle

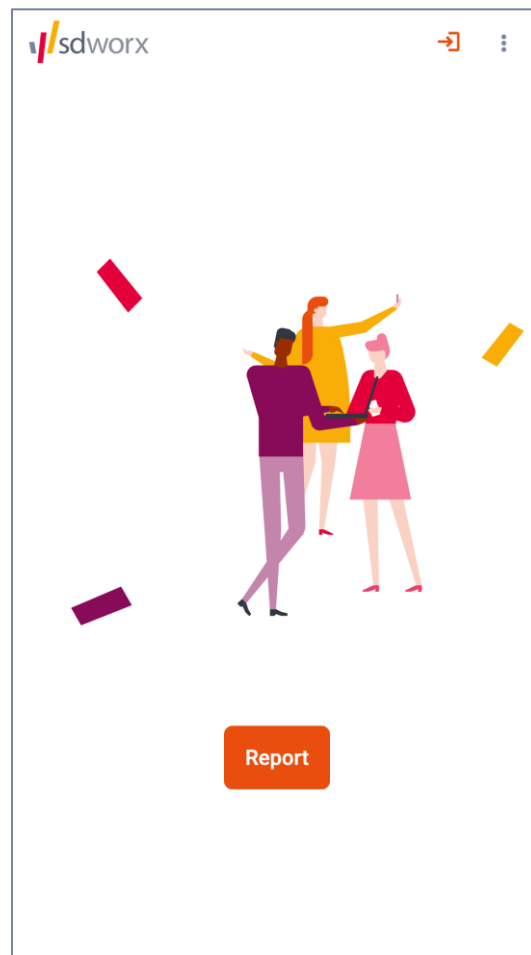
Manual

22/03/2023


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1. Manual for the Reporting Person

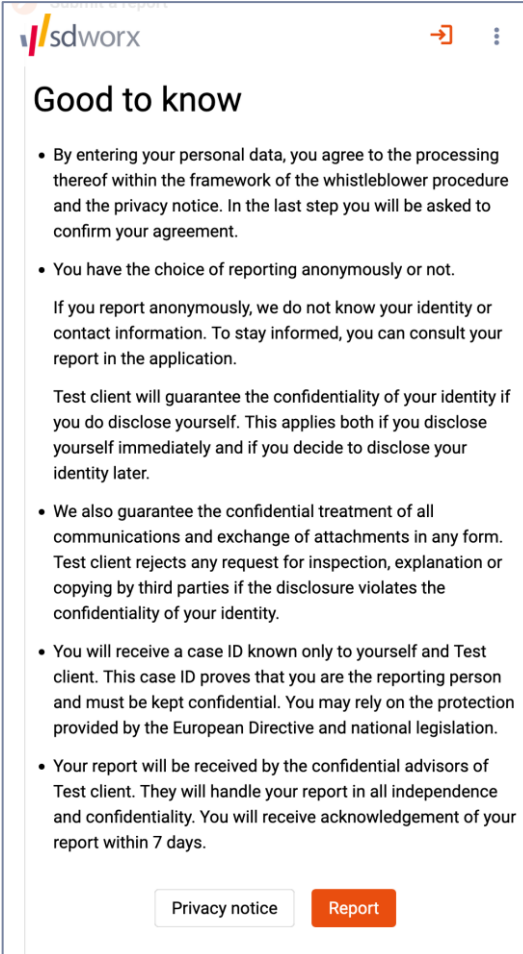
1.1 Submitting a report



The SD Whistle home page is available at customer.sdwhistle.com.

The Reporting Person can create a new report via the 'Report' button and log in via the  button at the top right to access an existing report.

The 'Report' button directs the Reporting Person to the next screen:



sdworx

Good to know

- By entering your personal data, you agree to the processing thereof within the framework of the whistleblower procedure and the privacy notice. In the last step you will be asked to confirm your agreement.
- You have the choice of reporting anonymously or not.

If you report anonymously, we do not know your identity or contact information. To stay informed, you can consult your report in the application.

Test client will guarantee the confidentiality of your identity if you do disclose yourself. This applies both if you disclose yourself immediately and if you decide to disclose your identity later.
- We also guarantee the confidential treatment of all communications and exchange of attachments in any form. Test client rejects any request for inspection, explanation or copying by third parties if the disclosure violates the confidentiality of your identity.
- You will receive a case ID known only to yourself and Test client. This case ID proves that you are the reporting person and must be kept confidential. You may rely on the protection provided by the European Directive and national legislation.
- Your report will be received by the confidential advisors of Test client. They will handle your report in all independence and confidentiality. You will receive acknowledgement of your report within 7 days.

[Privacy notice](#) [Report](#)

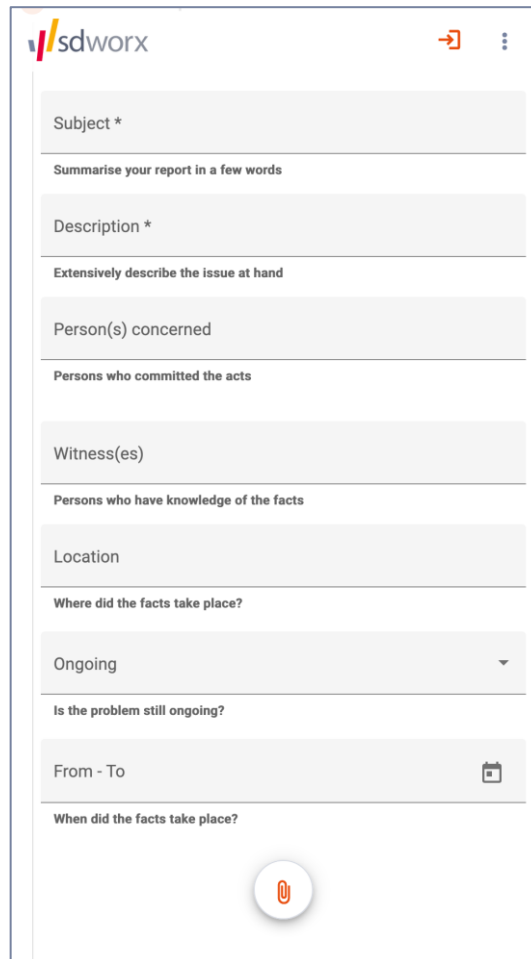
It is explained here that the Reporting Person has the choice of making a report anonymously or confidentially.

With an anonymous report, at no time is the identity of the Reporting Person requested by the application. Even in further communication, the identity remains fully protected.

In the case of a confidential report, the Reporting Person decides to enter his identity in the application. However, when dealing with the case, at no time may the identity of the Reporting Person be disclosed, except in the cases provided for by law.

1.2 Details of the report

After the Reporting Person clicks the 'Report' button, the application asks to enter the details of the report.

The screenshot shows a web form for reporting an incident. At the top is the 'sdworx' logo and a navigation menu with a red arrow icon and a three-dot menu icon. The form consists of several text input fields, each with a label and a placeholder text. The fields are: 'Subject *' with placeholder 'Summarise your report in a few words'; 'Description *' with placeholder 'Extensively describe the issue at hand'; 'Person(s) concerned' with placeholder 'Persons who committed the acts'; 'Witness(es)' with placeholder 'Persons who have knowledge of the facts'; 'Location' with placeholder 'Where did the facts take place?'; 'Ongoing' which is a dropdown menu currently showing 'Ongoing'; 'Is the problem still ongoing?' which is a checkbox; 'From - To' which is a date range picker; and 'When did the facts take place?' which is a date picker. At the bottom of the form is a circular button with a red paperclip icon, used for attaching files.

- **Subject:** The Reporting Person enters a title or subject for the report.
- **Description:** The Reporting Person gives a full description of the wrongdoing here.
- **Person(s) involved:** Here the Reporting Person can – if applicable – enter the persons concerned who are responsible for the breach.
- **Witness(es):** The Reporting Person can indicate who has knowledge of the facts, excluding himself.
- **Location:** In this free text box, the Reporting Person can indicate the location where the facts took place.
- **Ongoing:** This drop-down list allows the Reporting Person to specify whether the breach is ongoing or the breach is already over. A typical example is a dangerous situation in the workplace that has not yet been resolved.
- **From - To:** When did the facts take place? This date picker can be used to specify when the facts started and possibly ended.
- **Attachments:** The Reporting Person can add files that may support the report (e.g. photos, videos, Word or PDF files) using the attachment button at the bottom of the page.

1.3 Anonymous or confidential

On the next screen, a slider allows the Reporting Person to choose whether the report should be made confidentially or anonymously. In the case of an anonymous report, the Confidential Advisor will not receive any identifying information from the Reporting Person.

The image displays two screenshots of the sdworx mobile application interface. Both screens show a progress bar at the top with three steps: 'Submit a report' (completed), 'Details of the report' (completed), and 'Anonymous or confidential?' (current step). The left screenshot shows the 'Anonymous or confidential?' screen with the 'Anonymous' toggle switch turned on. Below the toggle are 'Back' and 'Next' buttons. The right screenshot shows the same screen but with the 'Anonymous' toggle switch turned off. Below the toggle is a form with the following fields: 'Name *', 'First name *', 'E-mail *', 'Telephone', 'Function', 'Street', 'House number', 'Postal code', 'City', and 'Country'.

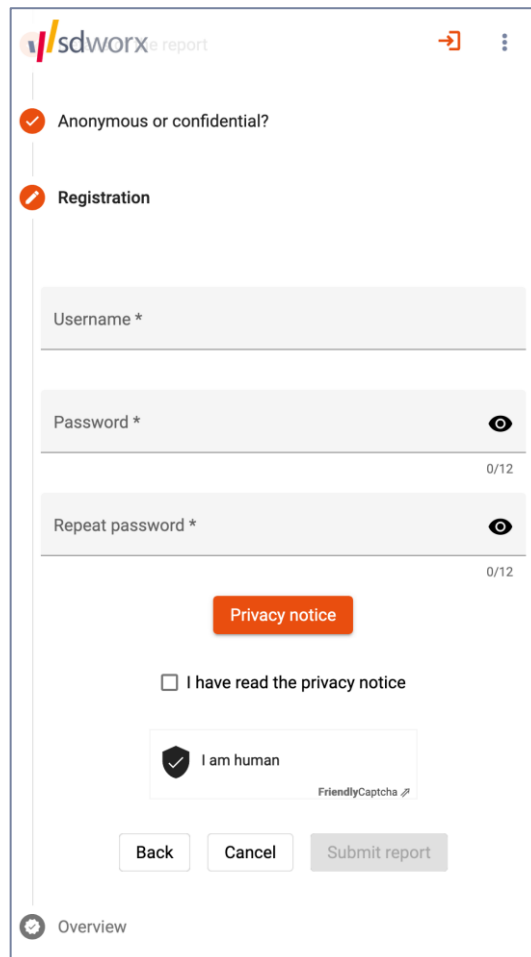
The application defaults to an anonymous report.

1.4 Account registration

In the next screen, the Reporting Person can choose a username with which to log into the application afterwards. The Reporting Person's username will be visible to the Confidential Advisor when the latter opens the report in the application. The Reporting Person chooses a strong password. The application will only accept sufficiently strong passwords.

For security reasons, the password cannot be recovered or reset if the Reporting Person forgets it. In this case, the Reporting Person must submit the report again.

To submit a report, the reporter must agree to the privacy policy, which can be viewed here. An automatic *captcha* checks that the user is not a robot making false reports.



The screenshot shows the 'sdworx report' application interface. At the top, there is a progress bar with two steps: 'Anonymous or confidential?' (completed with a checkmark) and 'Registration' (active with a pencil icon). Below the progress bar, the 'Registration' section contains three input fields: 'Username *', 'Password *', and 'Repeat password *'. Each password field has a toggle icon (an eye) and a character count '0/12'. Below the input fields is an orange button labeled 'Privacy notice'. Underneath the button is a checkbox labeled 'I have read the privacy notice'. Below the checkbox is a 'FriendlyCaptcha' widget showing a checkmark and the text 'I am human'. At the bottom of the form are three buttons: 'Back', 'Cancel', and 'Submit report'. In the bottom left corner, there is a circular icon with a gear and the text 'Overview'.

1.5 Overview

Once the report has been successfully received by the application, the Reporting Person will receive a summary of the report along with a unique case ID.

sdworx

Submit a report

Details of the report

Anonymous or confidential?

Registration

Overview

Your case ID

XRRC5R

Subject

GDPR leak not reported

Description

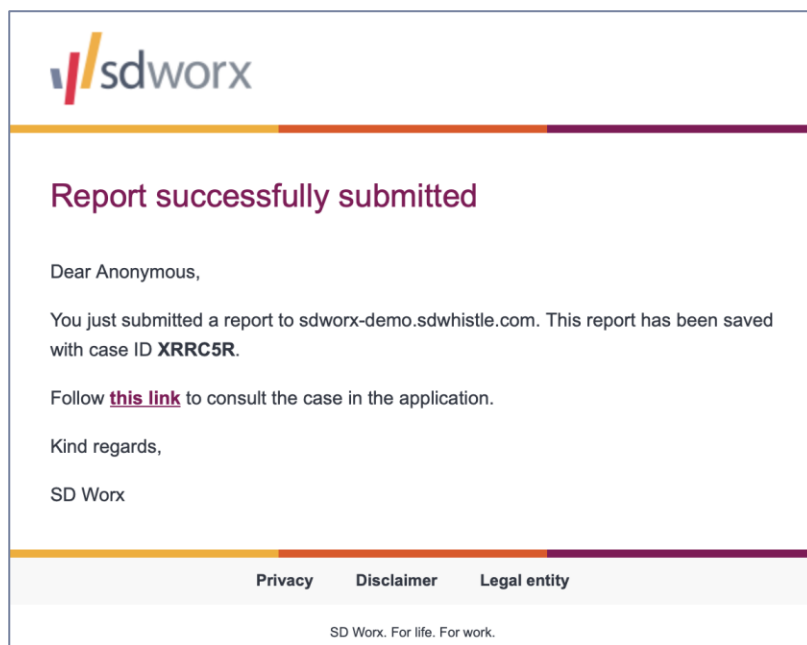
In the IT-department a data leak occurred last week. According to the GDPR this should have been reported, but it was decided not to. This could have serious repercussions and harm our reputation.

Back

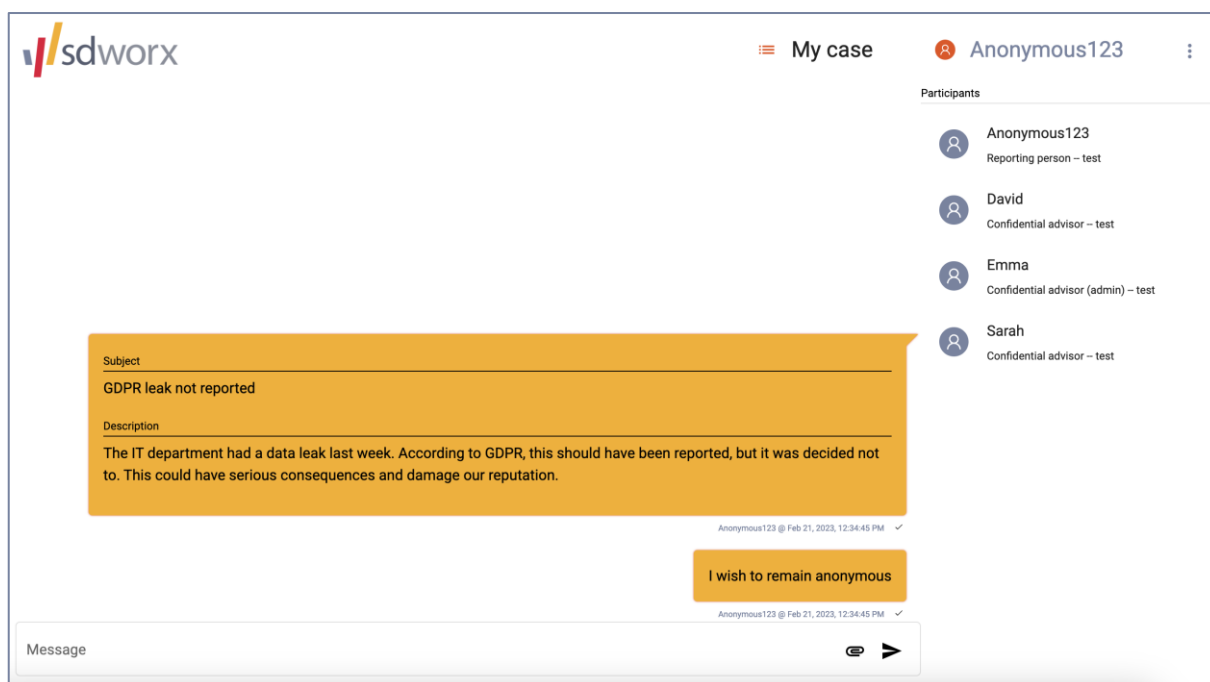
1.6 Consult a report

If the Reporting Person has reported confidentially, their email address is known and the application will send an email notification when there is a message for the Reporting Person. If the Reporting Person has reported anonymously, this is not possible and the Reporting Person will have to log in on their initiative to find out about any messages from the confidential advisor.

This email will contain the following message:



By following the link, the Reporting Person can log into the application and view the content of the communication. In this way, the Reporting Person can also send new messages and attachments to the Confidential Advisor.



2. Manual for the Confidential Advisor

2.1 Support

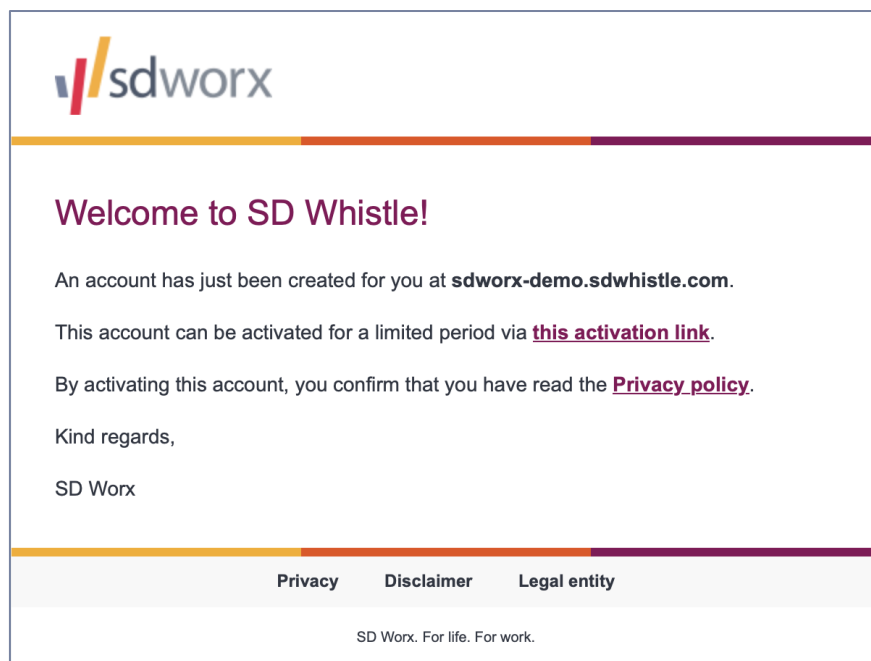
If you run into problems or if you have any questions, you can contact us by sending an e-mail to marketplace@sdworx.com.

2.2 Roles and responsibilities

Two roles exist in the application: 'Confidential Advisor' and 'Confidential Advisor (admin)'. The Confidential Advisor can communicate with the Reporting Person and modify properties such as priority, status, title, etc. of a report. The Confidential Advisor (admin) can do everything the Confidential Advisor can do, plus manage users.

2.3 Account activation

The Confidential Advisor will receive an activation email with a unique link to activate the account:



After clicking on the link, the Confidential Advisor will be taken to the activation screen where a username and strong password must be chosen. The username will be **visible to the Reporting Person** when they log into the system (see the last screenshot on page 8).

Activate your account by choosing a username and password.

Minimum:

- 12 characters
- 1 capital letter
- 1 number
- 1 non-alphanumeric character

Username (visible to reporting persons)

Password

Repeat password

Save

As the application may contain highly sensitive data, the security of this data is a top priority. Therefore, the application does not store passwords, even in *hashed form*. A lost password will result in a permanently inaccessible account. It is therefore **extremely important to remember your password**.

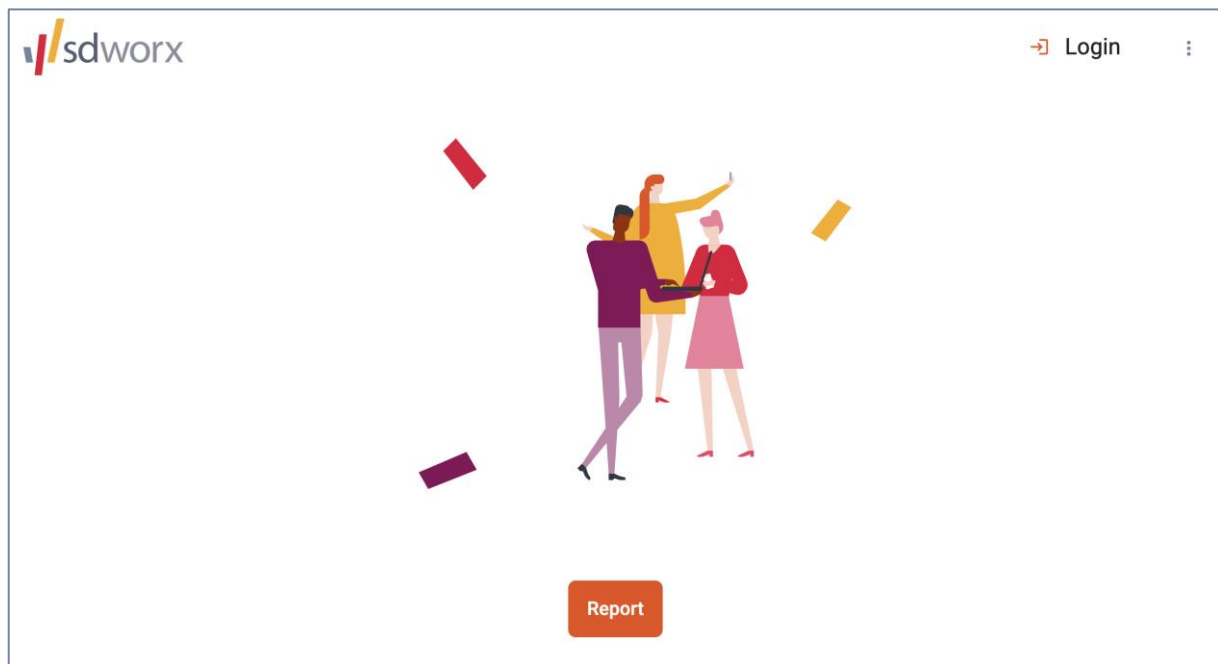
A message will then appear indicating that activation has been successful. The next step is for the Confidential Advisor to log in for the first time.

Account successfully activated

Click [here](#) to return

Clicking on the 'here' link will take the Confidential Advisor back to the home page of the application.

To log in, use the button at the top right.



This will take the Confidential Advisor to the login page:

Login at Demo

Username

Password

Login

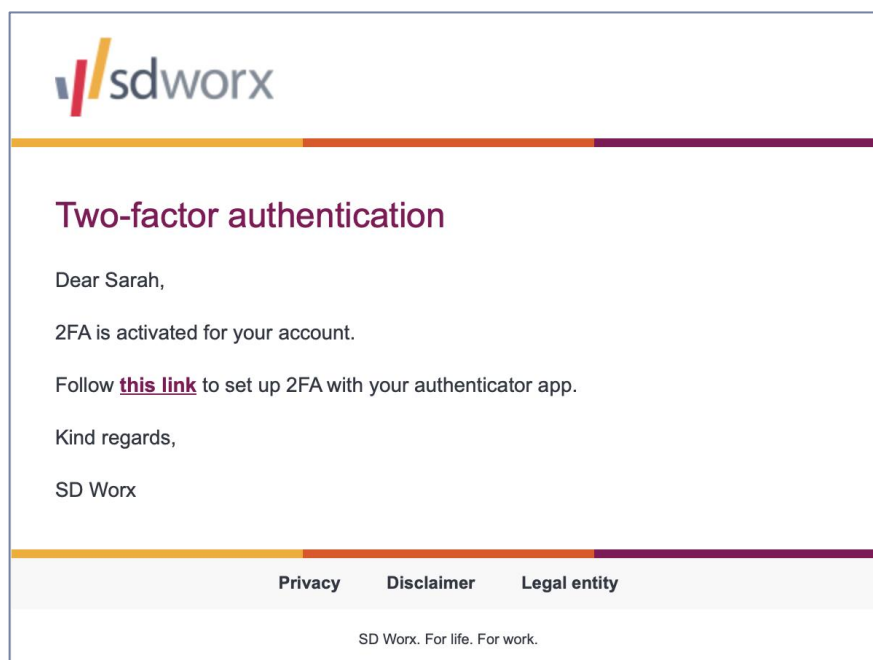
Cancel

After the first login, the following screen will appear, indicating that two-factor authentication (2FA) has been enabled. The 2FA step is mandatory and cannot be disabled due to the sensitivity of the data.

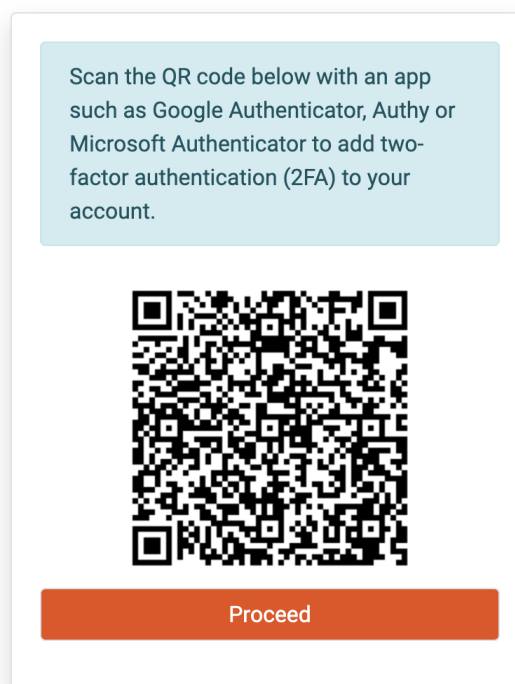
An email was sent to set up your two-factor authentication

Click [here](#) to return

This email looks like this and contains a link to enable two-factor authentication.

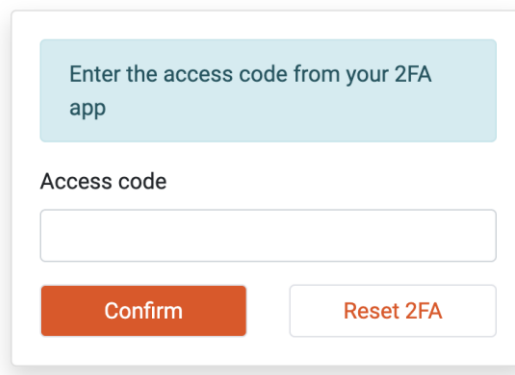


Following this link, the Confidential Advisor will need to log in again and will be taken to the following screen.



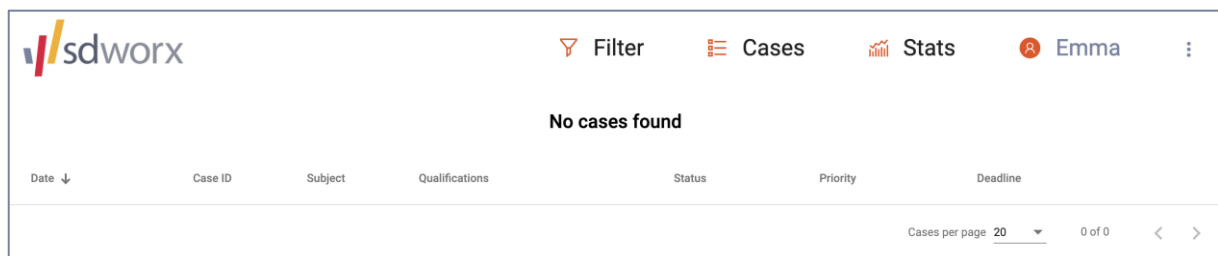
The Confidential Advisor installs an app such as Google Authenticator, Authy, Microsoft Authenticator, or an equivalent app on their smartphone. After scanning the QR code, the app displays a 6-digit code that refreshes every 30 seconds.

The next step is to enter the access code for the first time:



A modal window for 2FA authentication. It features a light blue header with the text "Enter the access code from your 2FA app". Below this is a label "Access code" followed by a white input field. At the bottom, there are two buttons: an orange "Confirm" button and a white "Reset 2FA" button with an orange border.

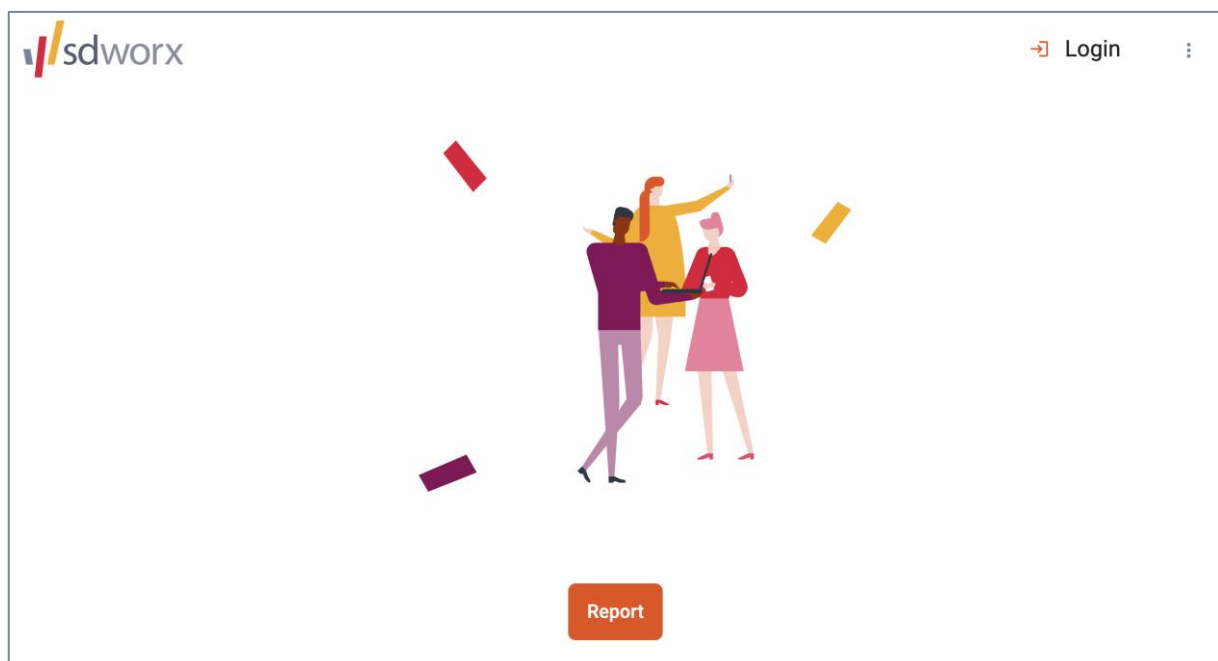
The Confidential Advisor will then automatically enter the application:



The sdworx dashboard interface. The top navigation bar includes the sdworx logo, a "Filter" button with a funnel icon, a "Cases" button with a list icon, a "Stats" button with a bar chart icon, and a user profile for "Emma". The main content area displays "No cases found" above a table with columns: Date, Case ID, Subject, Qualifications, Status, Priority, and Deadline. The table is currently empty. At the bottom right, there is a pagination control showing "Cases per page 20" and "0 of 0".

2.4 Login as Confidential Advisor

The application can be accessed via *client*.sdwhistle.com, where *client* is a self-selected abbreviation for the organisation.






















The sdworx login page. It features the sdworx logo in the top left and a "Login" button in the top right. The central area contains a colorful illustration of three people (two men and one woman) standing together, with several rectangular blocks floating around them. At the bottom center, there is an orange "Report" button.

The Confidential Advisor logs in to the application by clicking on the Login button in the top right-hand corner and entering the username and password, followed by the 2FA authentication code.

2.5 Case overview

After logging in, the Confidential Advisor is automatically taken to the case overview:

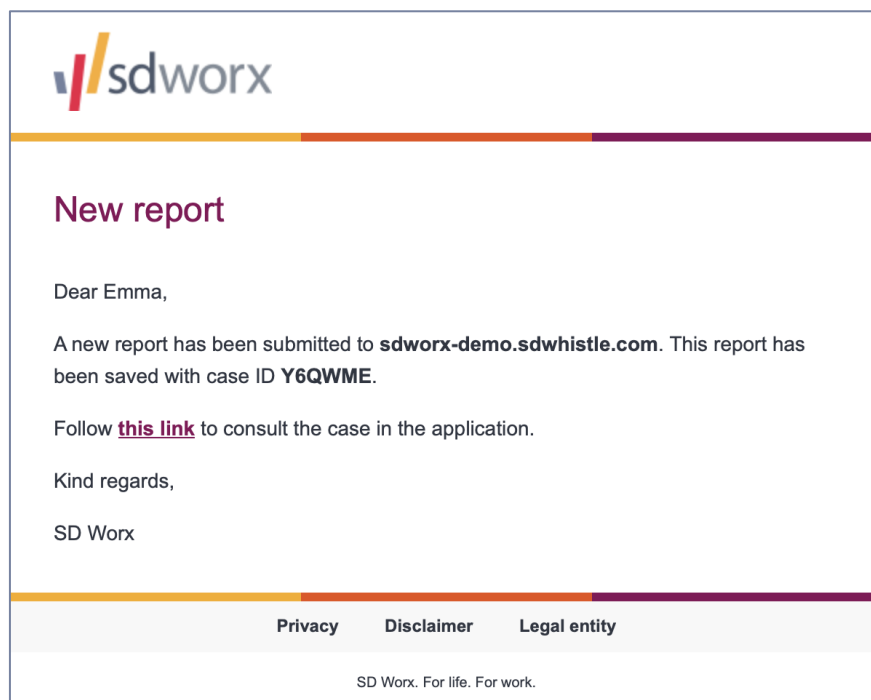
 Filter Cases Stats Emma						
Date ↓	Case ID	Subject	Qualifications	Status	Priority	Deadline
Feb 17, 2023	Y6QWME	Consultant invoices too much	Consumer Protection			in 2 months
Feb 17, 2023	OXMZIA	Burn-out inducing behavior from manager	Transgressive Behavior			in 2 months
Feb 17, 2023	YXFLKV	Dangerous situation in hall 4	Public Health			in 3 days
Feb 12, 2023	YY6PNT	GDPR leak not reported	Privacy And IT Security			in 2 months
Feb 6, 2023	XQTPE3	Testing the reporting channel	Financial Services			Closed
Jan 19, 2023	XINL5N	Bullying in the HR-department	Conflict Of Interest			in 3 months
Jan 7, 2023	FPOZOW	GDPR-lek werd niet gemeld bij GBA	Privacy And IT Security			2 months ago
Dec 30, 2022	MLLHRE	Test Romance Standard Time	Nuclear Safety			2 months ago
Dec 9, 2022	EETV8Z	Incorrect invoicing	Financial Services			Closed
Cases per page: 20 1 - 20 of 27 < >						

The application displays some useful information per report, such as report date, case ID, subject, status, priority, and deadline.

The filter function in the top menu allows you to limit the case view to only those reports that meet the specified parameters.

2.6 Receiving a report

When a report is made, the Confidential Advisor will receive an email with the following message:



A direct link takes the Confidential Advisor (after logging in) to the case page of the report:

sdworx Cases Stats Emma

Case ID **RR6IE9**

Submitted on Feb 21, 2023

Deadline **in 7 days**

Subject *

GDPR leak not reported

Reporting person

Qualifications

Status

New

Priority

Normal

Location

Report Internal chat

Subject

GDPR leak not reported

Description

The IT department had a data leak last week. According to GDPR, this should have been reported, but it was decided not to. This could have serious consequences and damage our reputation.

✓ Anonymous123 @ Feb 21, 2023, 12:34:45 PM

I wish to remain anonymous

✓ Anonymous123 @ Feb 21, 2023, 12:34:45 PM

Message

Internal note

No internal note yet...

Participants


- Anonymous123
Reporting person – test
- David
Confidential advisor – test
- Emma
Confidential advisor (ad...)
- Sarah
Confidential advisor – test

Communication with the Reporting Person is visible in the middle. The Confidential Advisor can communicate with the Reporting Person via chat messages.

2.7 Customise report properties

On the left-hand side of the screen are the report properties, the following of which can be modified by the Confidential Advisor:

- Description
- Qualifications
- Status
- Priority
- Location

Changes to the report properties must be saved using the  button.

All changes to the case are logged in the centre of the screen. This log provides an audit trail of the case's progress. This is an integral part of the integrity of the process. This audit trail is, of course, not visible to the reporting person. Only the messages sent by the Confidential Advisor to the Reporting Person are visible to the Reporting Person.

2.8 Sending an acknowledgement receipt to the Reporting Person

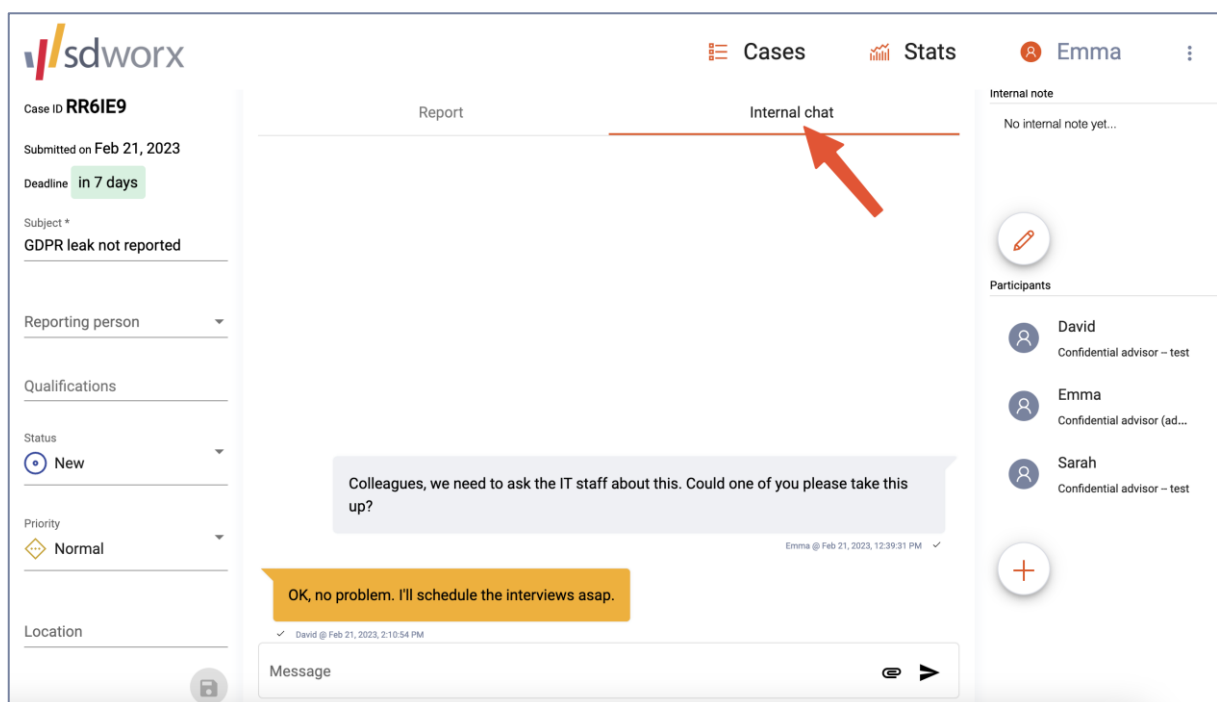
The Confidential Advisor will acknowledge the proper receipt of the report in the first communication to the Reporting Person. This must be done within 7 days in accordance with the Whistleblowing Directive 2019/EC/1937. This deadline is automatically tracked by the application in the top left-hand corner of the case screen.

Once the Confidential Advisor has replied to the Reporting Person, the application automatically changes the status from 'New' to 'In process'. In addition, once the report is received, the deadline for its resolution is automatically set to 3 months, in compliance with the Directive.


2.9 Encrypted communication with other Confidential Advisors

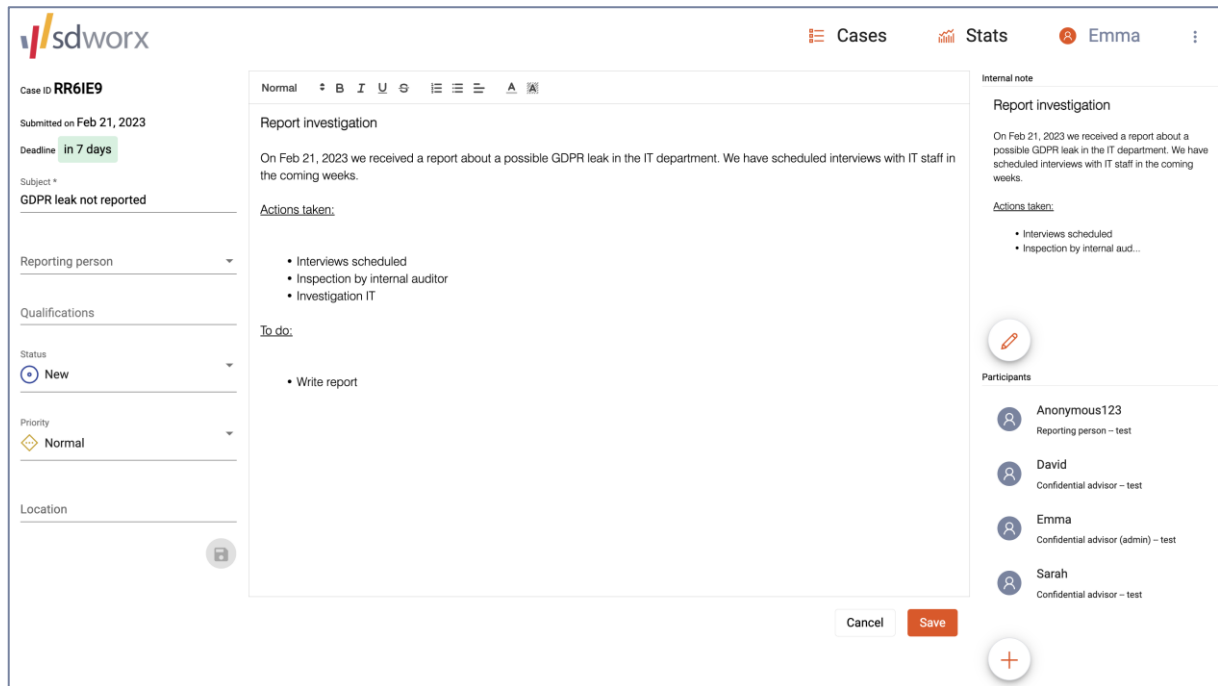
Email communication between Confidential Advisors about confidential reports should be avoided as this is not a secure communication channel.

The application provides a chat function with the other Confidential Advisors. This chat is encrypted and cannot be accessed by third parties.



2.10 Internal note

For each case, the Confidential Advisor can annotate their notes or those shared with other Confidential Advisors via 'Internal note' in the top right-hand corner. After clicking on the  icon, a text editor will appear in the centre of the screen. After entering or modifying the text, the internal note must be saved using the 'Save' button at the bottom.



The screenshot displays the sdworx interface for Case ID RR6IE9. The left sidebar contains case details: Submitted on Feb 21, 2023, Deadline in 7 days, Subject * GDPR leak not reported, Reporting person (dropdown), Qualifications, Status New, Priority Normal, and Location. The main content area features a text editor with a toolbar (Normal, Bold, Italic, Underline, Strikethrough, Bulleted List, Numbered List, Indent, Outdent, Link, Unlink) and a text area containing the following text:

Report investigation

On Feb 21, 2023 we received a report about a possible GDPR leak in the IT department. We have scheduled interviews with IT staff in the coming weeks.

Actions taken:

- Interviews scheduled
- Inspection by internal auditor
- Investigation IT

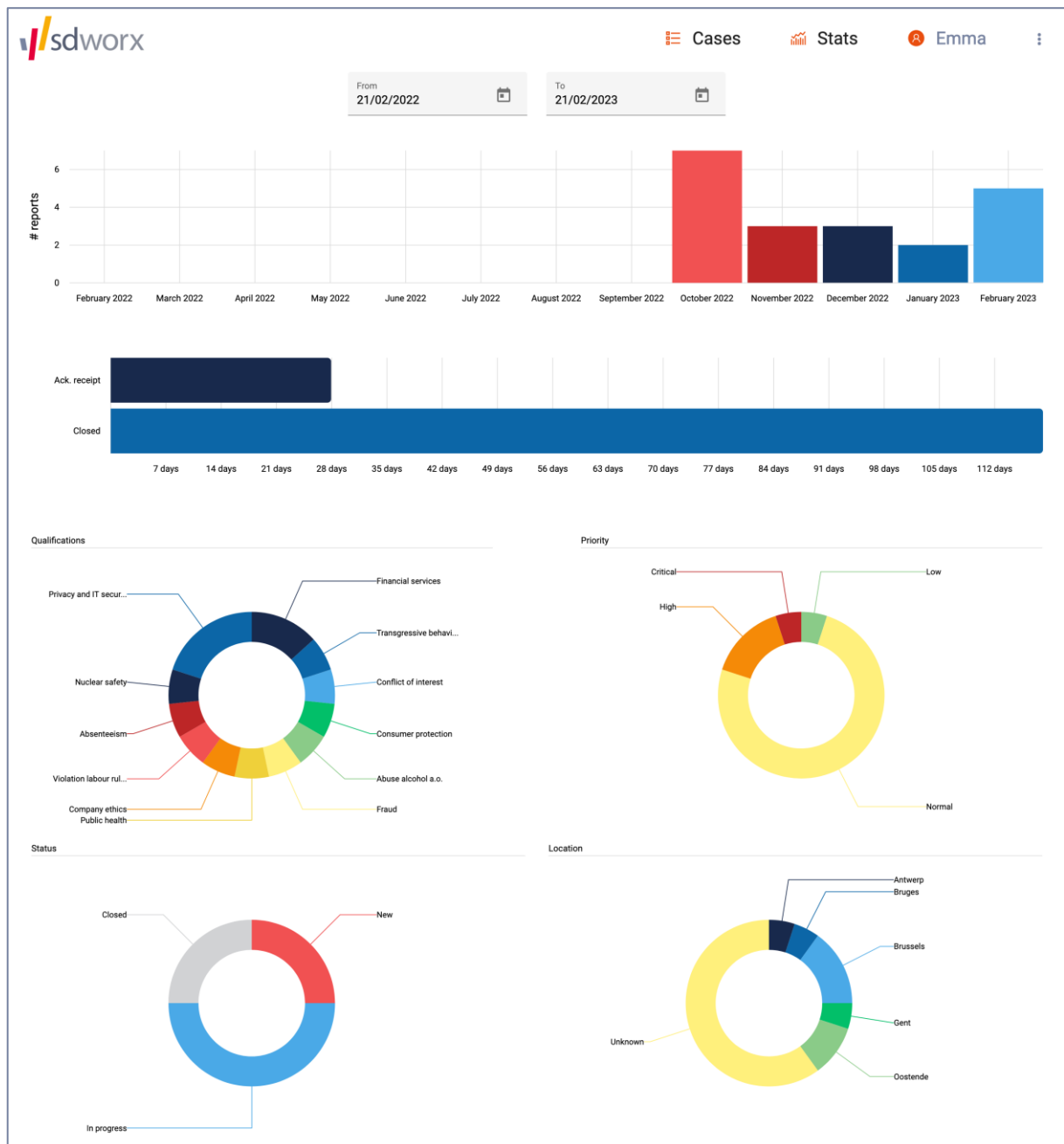
To do:

- Write report

The right sidebar shows the 'Internal note' section with a 'Report investigation' title and a text area containing the same text as the main content area. Below the text area is a 'Participants' list with four entries: Anonymous123 (Reporting person - test), David (Confidential advisor - test), Emma (Confidential advisor (admin) - test), and Sarah (Confidential advisor - test). At the bottom right, there are 'Cancel' and 'Save' buttons, and a '+' icon.

2.11 Statistics

The Confidential Advisor can get an overview of the cases he has access to via 'Stats' in the top menu.

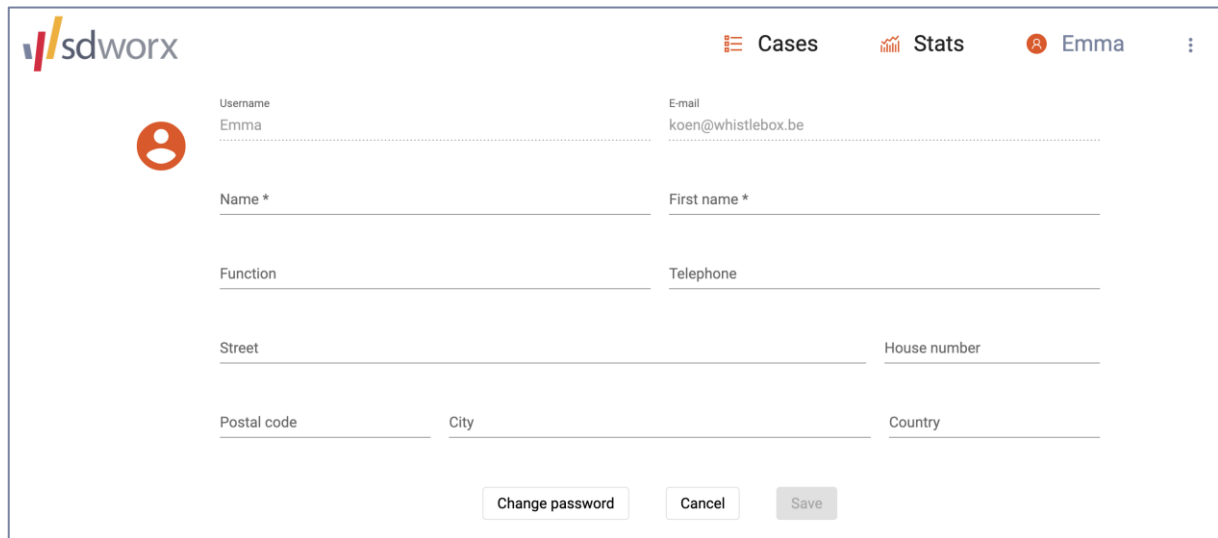


The 'From' and 'To' dates at the top of the page allow you to select the period for which the statistics are to be calculated.

The statistics contain a range of interesting data, including the average time it took the Confidential Advisors to comply with the deadlines as foreseen in the Directive.

2.12 Profile page

The Confidential Advisor can edit their profile by clicking on their name in the top right-hand corner.



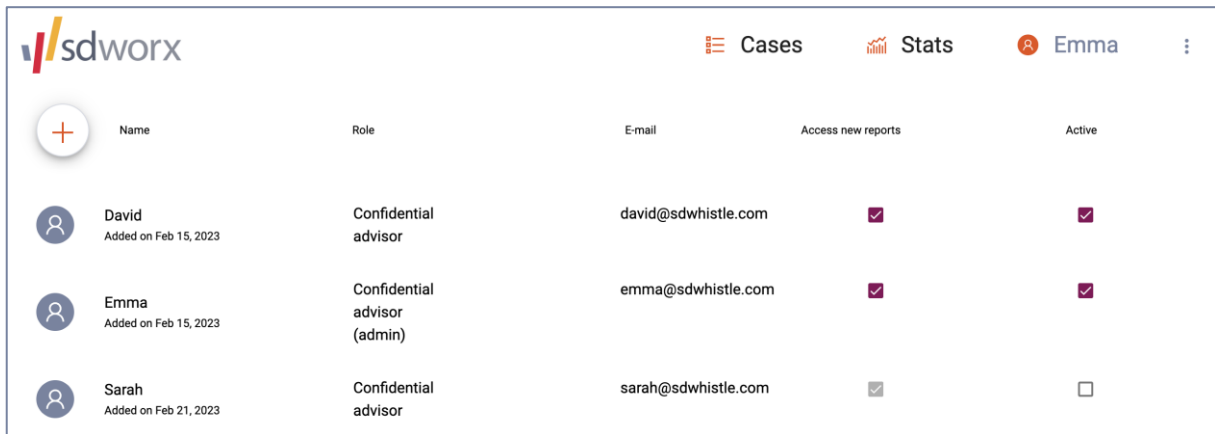
The screenshot shows the 'sdworx' profile page. At the top left is the 'sdworx' logo. At the top right are navigation links: 'Cases' (with a hamburger menu icon), 'Stats' (with a bar chart icon), and the user's name 'Emma' next to a profile icon and a dropdown arrow. The main content area contains a profile picture placeholder (an orange circle with a white person icon) and a form for personal details. The form fields are: 'Username' (with the value 'Emma'), 'Email' (with the value 'koen@whistlebox.be'), 'Name *', 'First name *', 'Function', 'Telephone', 'Street', 'House number', 'Postal code', 'City', and 'Country'. At the bottom of the form are three buttons: 'Change password', 'Cancel', and 'Save'.





Here, the Confidential Advisor can add their profile picture, complete their personal details and change their password.

Only the username is visible to the Reporting Person.


2.13 User management

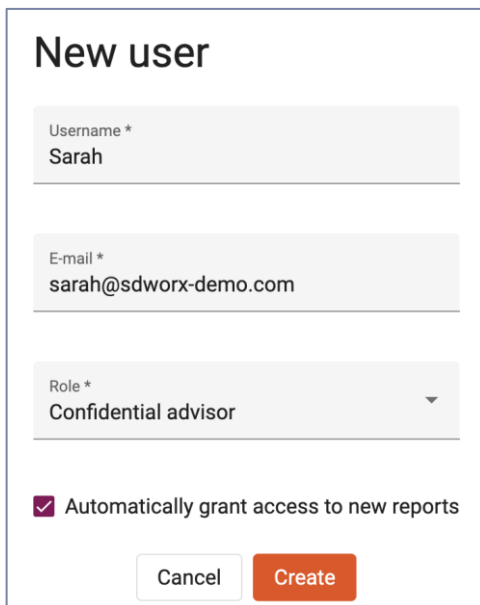
Click on the three vertical dots at the top right to access the 'Users' menu. This page lists the users who have access to the application.



	Name	Role	E-mail	Access new reports	Active
					
	David Added on Feb 15, 2023	Confidential advisor	david@sdwhistle.com	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Emma Added on Feb 15, 2023	Confidential advisor (admin)	emma@sdwhistle.com	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Sarah Added on Feb 21, 2023	Confidential advisor	sarah@sdwhistle.com	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Users with the 'Confidential Advisor (admin)' role can:

- invite users using the  button in the top left-hand corner;



New user

Username *

Sarah

E-mail *

sarah@sdworx-demo.com

Role *

Confidential advisor

☒ Automatically grant access to new reports

Cancel

Create

- grant users automatic access to new reports via the checkbox in the 'Access new reports' column;
- (de)activate users via the checkbox in the 'Active' column.

2.14 Language selection

In the same menu, under the three vertical dots, the language can be changed.

This does not affect the reporter's choice of language. Their reporting portal will still work in their chosen language.