

Information on data processing for whistleblowers*

1. Name and address of the person responsible

The controller for processing your data for the purposes described below is:

SECO Northern Europe GmbH
Schlachthofstraße 20
21079 Hamburg
Telephone: +49 40 791899-0

2. Contact details of the data protection officer

The data protection officer of the controller can be reached at:

Mr Cord Lange
c/o Vater Solution GmbH
Boschstr 5
24118 Kiel
E-mail: colange@vater-gruppe.de

3. Purpose of data processing and legal basis

The responsible body is legally obliged to set *up and* operate an internal reporting center in accordance with paragraph 12 of the Whistleblower Protection Act (HinSchG). Internal reporting units examine reports received and forward them (in accordance with the confidentiality requirements and their exceptions paragraph 8 and 9 HinSchG) to the relevant management bodies for follow-up action.

The purpose of the procedure is to detect infringements in the company at an early stage or to prevent, stop and/or punish them by means of warnings.

The Whistleblower Protection Act is addressed to employees and temporary workers on loan to employers. You can report information about infringements to the reporting authority as an informant. You can contact *the internal* reporting office described here or alternatively an external reporting office (paragraph 19 to 24 HinSchG).

Legal basis for data processing:

The processing of personal data (pbD) in the internal reporting office is based on Article 6, para. 1, lit c) (legal obligation) in combination with paragraph 10 HinSchG. 2, lit b) (legal obligation) processed pursuant to section 10 of the Swiss Law.

The processing of pbD mentioned in the messages is carried out according to the principles of paragraph 8,9,10,11 HinSchG.

Prior to any transmission of pbD to the company, which goes beyond paragraph 9, Abs.2 HinSchG, a separate consent shall be obtained from the person who reported the information.

Exclusively, and only if it is necessary to safeguard the business interests (taking follow-up measures), processing takes place under Art. 6, paragraph 1, lit f) GDPR; Balancing interests: the company has a legitimate interest in preventing and detecting violations and in reviewing internal processes for their legality and integrity.

4. Categories of personal data

In principle, the use of the reporting system is possible without providing personal data. However, you may voluntarily disclose personal data in the course of the whistleblowing process, in particular information on

- Your identity, such as first and last name,
- Your contact details, such as email address or phone numbers
- Your company/country to which your report relates

We do not generally ask for and process special categories of personal data, e.g. Information on ethnic origin, religious and/or ideological beliefs, trade union membership, sexual orientation or health data. Due to free text fields in the reporting form, such special categories of personal data may be voluntarily disclosed by you.

The notice you provide may also include personal data of third parties to whom you refer in your notice. Persons concerned are given the opportunity to comment on the information. In this case, we will inform the persons concerned about the notice. Your confidentiality is also preserved in this case, as no information on your identity will be provided to the person concerned - insofar as legally possible - and your information will be used in such a way that your anonymity is not endangered.

5. Categories of recipients

According to paragraph 8 HinSchG, reporting units must maintain the confidentiality of the identity of the reporting persons and of the persons who are the subject of the report.

If it is necessary for the particular case to pass on reported information in non-anonymised form to persons outside the reporting authority, this shall be done

- under the conditions of paragraph 9 HinSchG: There are exceptions to the confidentiality requirement according to paragraph 9 HinSchG, for example, if information about infringements has been reported intentionally or by gross negligence or if this is done at the request of law enforcement authorities or court decisions.
- on the basis of a consent pursuant to Art. Article 6 paragraph 1 letter a GDPR and Article 9 paragraph 2 letter. a GDPR, which we obtain from you beforehand, for example for further examination of the matter reported by you or for taking follow-up action.

Your personal data may be transferred to the following recipients:

- In compliance with the confidentiality requirements of the law, possibly the management and the departments concerned
- Possibly transfer to other competent authorities (for example police, tax office)
- IT service provider - For the technical implementation of the reporting system, we commission carefully selected processors in accordance with Article 28 GDPR

There is no provision for data transfer to third countries outside the EU/EEA.

6. Duration of storage

The documentation is carried out in accordance with the principles of paragraph 11 HinSchG and is deleted three years after the end of the procedure. The documentation may be kept for longer to meet the requirements of this Act or other legislation as long as it is necessary and proportionate.

7. Existing data protection rights

You have the right to

- To obtain information about the data stored by us,
- revoke a consent (if given) for the future,
- to object to the processing of your data, if there are reasons arising from your situation,
- that we correct incorrect data about you,
- that no more necessary data about you will be deleted from us,
- that under certain conditions the processing of your data is restricted and
- To receive your data in a machine-readable format (transferability).

If you would like to exercise any of your rights, please contact the person responsible (see above).

If you believe that the processing of your data violates data protection law or that your data protection rights have been violated in any way, you can complain to the supervisory authority.