

Privacy policy for the reporting system

Information in accordance with Art. 13 GDPR (General Data Protection Regulation, DSGVO = Datenschutzgrundverordnung,)

The Neuenhauser Group (Neuenhauser Group SE & Co. KGaA and the affiliated companies) processes personal data to fulfill its legal obligations. This also includes the data that the Neuenhauser Group has collected about you. In order to inform you about data processing and your rights and to comply with its duty to provide information in accordance with Articles 13 and 14 of the General Data Protection Regulation, the Neuenhauser Group informs you as follows:

1. Name and address of the party responsible

The party responsible within the meaning of the General Data Protection Regulation and other data protection laws applicable in the Member States of the European Union is

Neuenhauser Group SE & Co. KGaA
Hans-Voshaar-Strasse 5
49828 Neuenhaus
Phone: 0049 5941 6040
E-mail: info@neuenhauser.de

The rights and obligations of the joint controllers are agreed between them in accordance with Art. 26 GDPR. The respective controller is responsible for the duty to provide information. If you have any questions about data protection or exercising your rights, please contact the contact person named below.

2. Categories of personal data

As part of the Neuenhauser Group's whistleblower system, various personal data are processed in order to meet the requirements for reporting and processing reports. The processed data includes in particular

- **Information on the accused person:** This includes, for example, the surname, first name, title, contact details, professional position and information on employment, such as the department or place of work. This data is required to clearly establish the identity of the person concerned and to properly investigate the reported allegation.
- **Details of the reported breaches of conduct:** This is information about the alleged violations, e.g. of internal guidelines, laws or regulations, reported by the whistleblower. This also includes specific facts and events related to the allegation.
- **Information on the reporting person:** If the whistleblower does not remain anonymous, their personal data is also recorded. This includes surname, first name, contact details (e.g. e-mail address, telephone number) and, if applicable, further information about the circumstances under which the whistleblower observed the violations. This information is necessary in order to understand the report and to be able to ask questions if necessary.

3. purpose of data processing

The purpose of data processing as part of the reporting system is to receive and clarify serious suspicions of breaches of regulations at the Neuenhauser Group, in particular criminal acts in the area of white-collar crime and corruption. The Neuenhauser Group also processes personal data as part of the complaints procedure in the context of the Supply Chain Due Diligence Act (LkSG=Lieferkettensorgfaltspflichtengesetz) for the purpose of receiving and clarifying potentially significant breaches of regulations. These are violations of the human rights and environmental due diligence obligations of the Supply Chain Due Diligence Act.

The complaints received will be investigated for the above purpose in order to prevent, detect and/ or follow up on violations (such as measures to verify the validity of the allegations made in the report and, where appropriate, to address the reported violation, including through internal investigations, inquiries, prosecutions, (re-)recovery measures or closure of the procedure).

4. Legal bases for data processing

4.1 Notifications in accordance with the HinSchG:

Personal data of the whistleblower is generally processed on the basis of Art. 6 para. 1 lit. c GDPR in conjunction with Section 10 HinSchG (Hinweisgeberschutzgesetz). In other cases, the processing of personal data in the whistleblower system is carried out on the basis of Art. 6 para. 1 lit. f GDPR to safeguard the overriding legitimate interest of the Neuenhauser Group.

4.2 Notifications in accordance with the Supply Chain Due Diligence Act (LkSG):

The legal basis for the processing and collection of personal data as part of the complaints procedure is Art. 6 para. 1 lit. c GDPR in conjunction with §§ 8, 9 LkSG.

5. Recipients or categories of recipients of the personal data

The Neuenhauser Group ensures that your personal data is only accessible to a limited number of authorized persons who need to know this data for the provision of the above-mentioned processing purposes.

If it should be necessary to clarify the matter, personal data may be forwarded to individual, carefully selected persons of the Neuenhauser Group or - if they are also affected by the matter in question - to subsidiaries of the Neuenhauser Group to the extent necessary. Every person who receives access to the data is obliged to maintain confidentiality.

In addition, information about the identity of the reporting person or other circumstances that allow conclusions to be drawn about their identity may be passed on, provided that

- the disclosure is necessary for follow-up measures and / or
- The reporting person has previously consented to the disclosure.

5.1 Disclosure to third parties in accordance with HinSchG

The disclosure of personal data of the potentially infringing person to third parties (e.g. public prosecutor's office, police) is based on Art. 6 para. 1 f. GDPR i.V.m. § Section 9 para. 2 HinSchG:

- in criminal proceedings at the request of the criminal prosecution authorities,
- on the basis of an order in an administrative procedure following a notification, including administrative fine proceedings,
- due to a court decision,
- by the Federal Financial Supervisory Authority as external reporting office pursuant to Section 21 HinSchG to the competent specialist departments within the Federal Financial Supervisory Authority and, in the case of transactions specified in Section 109a of the German Securities Trading Act, to the bodies specified in Section 109a of the German Securities Trading Act, or
- by the Bundeskartellamt as external reporting office pursuant to Section 22 HinSchG to the competent departments within the Bundeskartellamt and, in the cases of Section 49 (2) sentence 2 and (4) and Section 50d of the Act against Restraints of Competition, to the competent competition authority.

5.2 Disclosure to third parties in accordance with LkSG

The disclosure of personal data of the potentially infringing person to third parties (e.g. public prosecutor's office, police) is based on Art. 6 para. 1 f. GDPR i.V.m. § 17 LkSG:

- In criminal proceedings at the request of the criminal prosecution authorities,
- On the basis of an order in an administrative procedure following a notification,
- On the basis of a court decision or
- As part of reporting on the fulfillment of due diligence obligations to the Federal Office of Economics and Export Control.

6. Duration of data storage

Personal data will be retained for the period necessary to clarify and conclusively assess the report. Once the investigation has been completed, the personal data will be deleted within a reasonable period of time in accordance with the legal requirements. In the event that legal and/or disciplinary proceedings are initiated, the data may be stored until the conclusion of the proceedings or until the expiry of the time limits for legal remedies. Personal data in connection with groundless reports will be deleted immediately.

7. Data security

The Neuenhauser Group uses technical and organizational measures to protect the personal data to be managed by using the reporting system from unauthorized access, disclosure, misuse, manipulation, loss and destruction during its collection, processing and use. Service providers used by the Neuenhauser Group are obliged to the same extent.

8. Automated decision making

No automated decision-making pursuant to Art. 22 GDPR takes place as part of the reporting system.

9. Rights of data subjects

9.1 Cooperation between those responsible

You are entitled to your rights under the General Data Protection Regulation against all of the controllers named. If your data subject request requires an exchange of personal data between the controllers, your data will be exchanged as part of the cooperation between the controllers. The legal basis for this is our legitimate interest in effective cooperation in accordance with Art. 6 Para. 1 S. 1 lit. f GDPR or the legal obligation to pass on requests from data subjects within the meaning of Art. 6 Para. 1 S. 1 lit. c GDPR. Examples of the obligation to pass on data are the information on the revocation of a declaration of consent to other bodies authorized from the declaration of consent or the information on data deletion in accordance with Art. 19 GDPR.

9.2 Right to information

In accordance with Art. 15 GDPR, you have the right to request information from the controller as to whether personal data concerning you is being processed.

For this purpose, an overview of the processing purposes, the categories of personal data processed, the respective recipients or categories of recipients and a copy of the stored data will be provided.

The identity of the whistleblower is generally excluded from this right to information. If the exercise of this right jeopardizes the clarification of the facts or the securing of necessary evidence, the Neuenhauser Group is permitted to comply with the right at a later point in time.

9.3 Rights to rectification, erasure and restriction of processing

In accordance with Art. 16 GDPR, you have the right to obtain without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you also have the right to request the completion of incomplete personal data.

In accordance with Art. 17 GDPR, you have the right to demand that the controller erase personal data concerning you without undue delay, provided that there is no other legal requirement to the contrary.

In accordance with Art. 18 GDPR, you have the right to demand the restriction of processing if

- you dispute the accuracy of your personal data,
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead,
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims
- you object to the processing in accordance with Art. 21 GDPR.

9.4 Right of withdrawal

You have the right to withdraw your consent in whole or in part for the future in accordance with the above conditions. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

9.5 Right of objection

You have the right to object at any time to the processing of your personal data based on Art. 6 para. 1 sentence 1 lit. e and lit. f GDPR. The controller will then no longer process the personal data unless you can demonstrate compelling legitimate grounds which override the interests, rights and freedoms of the data subject.

9.6 Right of appeal to the supervisory authority

You also have the right to complain to the competent supervisory authority about data processing by the responsible party.

As a data subject, you have the right of information about the personal data stored about you. The identity of the whistleblower is generally excluded from this right. If the exercise of this right jeopardizes the clarification of the facts or the securing of necessary evidence, the Neuenhauser Group is permitted to comply with the right at a later point in time. You also have the right to have incorrect data corrected, changed, blocked or deleted if the legal requirements are met. The data subject can address inquiries regarding the exercise of data subject rights in accordance with Art. 15-21 GDPR to one of the responsible offices.

10 The contact persons of the Neuenhauser Group can be reached as follows:

Neuenhauser Group SE & Co. KGaA
Compliance Department
Hans-Voshaar-Str. 5
49828 Neuenhaus

E-Mail: Hinweisgeber@neuenhauser.de