

Privacy Statement

Regarding the processing of personal data within the scope of the whistleblower channel

The purpose of the whistleblowing channel is to provide employees, interns, trainees, volunteers, temporary workers, job applicants, self-employed persons, members of an administrative or management body, contractors and subcontractors, and shareholders (each a “whistleblower”) to report serious misconduct that has occurred or is alleged to have occurred within our organization. This is an important tool for reducing risk and maintaining trust in our activities, as it enables us to take action at an early stage. The whistleblowing channel (the “**channel**”) is provided by our processor, an external party that processes personal data on behalf of Pollmann International GmbH. The channel enables whistleblowers to submit anonymous reports.

This Privacy Statement describes how we collect and use your personal data (as defined in the General Data Protection Regulation (EU) 2016/679, the “**GDPR**”) that we process to comply with our legal obligations under Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law (the “**Directive**”) and the relevant national implementing laws, in compliance with applicable data protection laws. This Privacy Policy also describes your rights and how you can exercise them.

Further information about the whistleblowing team and the management of whistleblower topics can be found in the whistleblowing guidelines under [Compliance | Pollmann International](#).

In case of questions or comments regarding data protection and the processing of your personal data mentioned here, contact us via email.

1 **PERSONAL DATA WE PROCESS, PURPOSE OF PROCESSING, AND LEGAL BASIS**

Personal data that we may process	<ul style="list-style-type: none">• Name, country, profession, department, work/home address, name of manager, social security number, telephone number, address, email address of the whistleblower;• Information about the subject of the report, e.g., name and contact details of the person who is the subject of the report, a description of the violation or abuse, time and place, and any other information that the reporter considers relevant (depending on the nature of the report, the personal data processed may include personal data belonging to special categories of personal data);• Name and contact details of witnesses or other individuals involved in the case• Information about how reports are created, processed, and transmitted (including report
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	<p>code and status)</p> <ul style="list-style-type: none"> • Other information provided by the reporter that contains personal data • Information about the individuals who process reports received through the channel, e.g., name, job title, email address, user ID.
Purpose of processing	<ul style="list-style-type: none"> • To enable whistleblowers to report serious misconduct, monitor and investigate irregularities, and, where necessary, prepare, initiate, or defend legal action.
Legal basis for processing	<ul style="list-style-type: none"> • To fulfill our legal obligation (Article 6(1)(c) of the GDPR); • Our legitimate interest in ensuring the legality and ethics of our activities (Article 6(1)(f) of the GDPR); • In cases where such reports contain information about special categories of personal data, the processing of this information is necessary for the establishment, exercise, or defense of legal claims pursuant to Article 9(2)(f) of the General Data Protection Regulation.

2 HOW WE COLLECT YOUR PERSONAL DATA

The information comes from the person filing a report and may be supplemented by information necessary for the investigation. In this case, the information comes from us or a third-party source in order to verify the information received.

3 HOW WE SHARE YOUR PERSONAL DATA

In principle, your personal data may be disclosed to:

- **Lawyers.** In addition to our whistleblowing team, lawyers or other experts and internal auditors approved by the controller may be involved in the processing and follow-up of whistleblowing reports.
- **Authorities.** Information may also be disclosed in accordance with the law, e.g., to the police in connection with a criminal investigation. However, the identity of the reporter may be disclosed if this is necessary for the competent authority to determine the

validity of the report, for the investigating authorities or the public prosecutor to perform their duties, or to prepare, assert, or defend a legal claim.

- **Our processor.** Your personal data will be shared with our data processor in order to provide the channel. In this context, our data processor also uses service providers to provide its services. Our processor is not authorized by us to use or disclose your personal data unless this is necessary for the provision of the service or to comply with legal requirements. We do not allow our suppliers or subcontractors to use your personal data that we disclose to them for marketing purposes or for purposes other than in connection with the services they provide to us.

4 WHERE WE PROCESS YOUR PERSONAL DATA

We always strive to process and store your data within the EU/EEA. However, in certain situations, your data may be transferred to relevant recipients on a need-to-know basis, as described above. For example, we may be legally obliged to disclose your personal data to authorities both in the country where you and we are based and abroad. This could mean that your personal data is transferred to third countries outside the EU/EEA area, such as China, Mexico, and the USA.

Please note that data protection laws in countries outside the EU/EEA may not be the same and, in some cases, may offer less protection than data protection laws in your country. However, we always select our service providers carefully and take all necessary measures to ensure that your personal data is processed with appropriate safeguards in accordance with Article 46(2)(c) GDPR.

5 HOW LONG WE STORE YOUR PERSONAL DATA

The data will be stored for the maximum statutory retention period under national law for 5 years after the whistleblower case has been closed. After this period, your personal data will be deleted or anonymized, unless we are legally obliged to retain it.

The log of submitted reports, which contains the names of the persons involved in the investigations, is retained for 3 years for compliance review purposes; after that, a review is conducted to determine whether further retention is necessary.

6 YOUR RIGHTS

- **Right of information and access to your data.** You have the right to request information about how we process your data and to receive a copy of the personal data we process. The first copy can be requested free of charge. However, if you repeatedly request copies in an unreasonable manner, we may charge you an administrative fee.
- **Right of rectification.** You have the right to correct inaccurate or incomplete information.

- **Right to erasure (“Right to be forgotten”).** You have the right to request that we erase personal data about you, for example, if the data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or if there is no legal basis for processing the data.
- **Right to restriction.** You have the right to request that the processing of your personal data be restricted until inaccurate or incomplete information about you has been corrected or an objection you have raised has been processed.
- **Right to object.** You have the right to object to processing based on legitimate interest. This means that we may no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests.
- **Right to withdraw your consent.** You may withdraw your consent at any time. Please note, however, that this will not affect any processing that has already taken place.
- **Right to lodge a complaint.** You have the right to lodge a complaint with the supervisory authority in the country where you live or work if you believe that we have not fulfilled our obligations with regard to your personal data. In Austria, the supervisory authority is the Austrian Data Protection Authority (Find information here: <https://data-protection-authority.gv.at>; Submit complaint here: <https://dsb.gv.at/eingabe-an-die-dsb/beschwerde>, email: dsb@dsb.gv.at).

Please note that our legal rights or obligations may prevent us from disclosing or transferring all or part of your data, or from deleting your data immediately.

Please contact us using the contact details below to exercise your rights.

Compliance

Pollmann International GmbH

Raabser Str. 1 / 3822 Karlstein / Austria / helmut.grobbauer@pollman.at / Tel.: +43 2844 223-0

7 EXCEPTIONS TO THE RIGHTS OF THE DATA SUBJECT

The right of information does not apply to data that could reveal the identity of the whistleblower.

Please also note that, in accordance with Article 14(5)(b) of the General Data Protection Regulation, the right of information is restricted if the information would make it impossible or seriously impair the achievement of the objectives of this processing (investigation of a whistleblower case).

8 SECURITY MEASURES

The channel is encrypted and password-protected to ensure the anonymity of the whistleblower.

Reports received via the channel are only received and processed by authorized personnel. No IP addresses are recorded in the channel, and the system does not use cookies. All data

transmission and storage of personal data is encrypted to prevent it from being falsified or accessed by unauthorized persons.

9 CHANGES TO THIS PRIVACY STATEMENT

We may change and update this privacy statement. We will inform you of any significant changes to this privacy statement or our processing of your personal data.