



Information on data protection in the whistleblower system of the EUROGATE-Group

In the following, we would like to inform you about the collection, processing and use of personal data within the whistleblower system in accordance with Art. 13, 14 of the General Data Protection Regulation (DSGVO), if you submit a whistleblower report by e-mail, telephone call, letter, personal appearance in the compliance department of the EUROGATE-Group, or through the internal whistleblower portal. We process personal data within the framework of our whistleblower system only in accordance with the relevant applicable laws.

I. Purpose of the whistleblower system and data processing

The purpose of the whistleblower system is to receive and process information about (suspected) violations of the law or serious internal rules against the EUROGATE-Group in a secure and confidential manner. The processing of personal data within the framework of the whistleblower system is based on the legitimate interest of the respective company of the EUROGATE-Group in the detection and prevention of wrongdoing and the associated prevention of damage and liability risks for the EUROGATE-Group (Art. 6 (1) lit. f DSGVO in conjunction with Sections 30, 130 Administrative Offenses Act („OWiG“)). In addition, item 4.1.3. of the [German Corporate Governance Code](#) requires the establishment of a whistleblower system in order to provide employees and third parties with the opportunity to report legal violations within the company in a protected manner. If a tip-off received relates to an employee of the EUROGATE-Group, the processing also serves to prevent criminal offenses or other legal violations that are related to the employee relationship (Section 26 (1) Federal Data Protection Act („BDSG“)). The processing of your identification data is based on a consent to be given (Art. 6 para. 1 lit. a DSGVO), which is given by the fact that the tip can also be given anonymously.

II. Processing of your personal data

Use of the whistleblower system is on a voluntary basis. We collect the following personal data and information when you submit a report:

- Your name, if you disclose your identity,
- Your contact details, if you provide them to us,
- the fact that you have made a report via the whistleblower system,
- whether you are employed by the EUROGATE-Group, and
- if applicable, names of persons and other personal data of the persons named in the report.

In the course of processing reports or conducting an investigation, it may be necessary to pass on information to other employees of EUROGATE GmbH & Co.KGaA, KG or employees of subsidiaries, e.g. if the information relates to processes in subsidiaries of EUROGATE GmbH & Co.KGaA, KG.

We always ensure that the relevant data protection regulations are observed when passing on information. In the event of a corresponding legal obligation or data protection law necessity for the clarification of information, further possible categories of recipients are law enforcement authorities, antitrust authorities, other administrative authorities, courts and international law and auditing companies commissioned by the EUROGATE-Group. Any person who gains access to the data is obliged to maintain confidentiality. Personal data will be kept confidential for as long as stored as required for the clarification and final assessment, a legitimate interest of the company or a legal requirement exists. Afterwards, this data is deleted in accordance

with the legal requirements. The duration of storage depends in particular on the severity of the suspicion and the reported possible breach of duty.

III. Your rights

According to European data protection law, you and the persons mentioned in the notice have the right to information, correction, deletion, restriction of processing and, in certain cases, the right to data transfer. In addition, you may object to the processing of your personal data on grounds relating to your particular situation, provided that the data processing is carried out in the public interest or on the basis of a balancing of interests. The objection can be made form-free and should, if possible, be sent to the contact details listed in this data protection notice. If the right to object is exercised, we will immediately check the extent to which the stored data is still required, in particular for processing a notice. Data that is no longer required will be deleted immediately. You can also revoke your consent at any time. You also have the right to lodge a complaint with a competent supervisory authority. The right of complaint can be asserted in particular at a supervisory authority in the member state of the place of residence or workplace of the data subject or the place of the alleged infringement.

IV. Person responsible for data processing

EUROGATE GmbH & Co.KGaA, KG

Kurt-Eckelmann-Strasse 1

21129 Hamburg

E-mail: compliance@eurogate.eu

You can reach our data protection officer as follows:

Jhcon Data Protection Consulting

Dipl.-Ing. Jörg Hagen

Königstraße 50a

D-30175 Hannover

E-Mail: hagen@jhcon.de