

Information on the collection, processing and use of personal data within the whistleblowing and complaints system

1. <u>Controller:</u>	STRATEC SE
2. <u>Contact details for the data protection officer:</u>	Wolfgang Zeiske Gewerbestr. 37, 75217 Birkenfeld, Germany datenschutz@stratec.com
3. <u>Purposes for which personal data is processed</u>	The whistleblowing and complaints system enables reports of any suspected legal violations or serious violations of internal regulations against the STRATEC Group to be received and handled in a secure and confidential way. Accordingly, personal data is processed within the whistleblowing system for the purpose of detecting and preventing misconduct, misuse and legal violations, and to therefore avoid the associated damage and liability risks for the STRATEC Group.
4. <u>Legal basis of the data processing</u>	Processing and use of personal data within the whistleblowing system in accordance with - point c) of Article 6(1) GDPR, point f) of Article 6(1) GDPR in conjunction with Sections 30 and 130 of the Act on Regulatory Offences (<i>Gesetz über Ordnungswidrigkeiten, OWiG</i>) or point a) of Article 6(1) GDPR, unless the report is made anonymously.
5. <u>Recipients/categories of recipients</u>	Internal departments such as Human Resources, Investor Relations/Marketing, IT, the works council, the Legal department and other potential categories of recipients such as competition authorities, law enforcement authorities, courts, and international law firms and auditing firms commissioned by the STRATEC Group. Every person who has access to the data is subject to a non-disclosure and confidentiality obligation.
6. <u>Transfer to a third country</u>	If necessary for the purpose of investigation, data may be transferred to a STRATEC group subsidiary in a country outside the European Union or the European Economic Area on the basis of adequate, appropriate legal data protection safeguards that ensure the protection of data subjects. Please note that not all third countries offer a level of data protection that the European Commission recognises as appropriate. In the event of data transfers to third countries we ensure, before making the transfer, that there is an EU adequacy decision in accordance with Article 45 GDPR for the relevant third country or that the user has given their explicit consent. We always comply with the application provisions of data protection law when sharing information.
7. <u>Duration of storage</u>	Personal data is stored for as long as necessary to investigate and subsequently reach a decision or for as long as the company has a legitimate interest or a legal obligation. The data is then permanently erased in accordance with legal requirements. The duration of

	storage is based on the severity of the suspicion and the reported potential violation in particular.
8. <u>Data subject rights</u>	<ul style="list-style-type: none"> • Access (Article 15 GDPR) • Rectification (Article 16 GDPR) • Erasure (Article 17 GDPR) • Restriction of processing (Article 18 GDPR) • Objection to processing (Article 21 GDPR) • Data portability (Article 20 GDPR) • Withdrawal of consent, if applicable (Article 7(3) GDPR)
9. <u>Right to lodge a complaint with a supervisory authority</u>	As a data subject, the person making the report also has the right to lodge a complaint with the data supervisory authority, the Baden-Württemberg State Representative for Data Protection and Freedom of Information (<i>Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg</i>).