

Data protection information for the Whistle blower system according to the Whistle Blower Protection Act and the Supply Chain Due Diligence Act for the STREICHER Group

Subject of the data protection information

The STREICHER Group (MAX STREICHER GmbH & Co. KG aA and its affiliated companies) is obliged to implement a system for receiving confidential notices and complaints (referred to as notice in the following document) regarding possible misconduct, in accordance with the Whistle Blower Protection Act (HinSchG) and the Supply Chain Due Diligence Act (LkSG). To ensure the legally required confidentiality, the law office SWS Partner mbB has been appointed as Ombudsman for the STREICHER Group in these matters.

Due to the transfer, management and investigation of notices, Personal Data are unavoidably processed by the Ombudsman and the STREICHER Group.

Personal Data means any information, which allows conclusions regarding you or any third person.

Please refer to the following text for information regarding the processing of Personal Data and your legal rights based on the regulations within the General Data Protection Regulation.

Contact via e-mail

The Ombudsman can be contacted via the following e-mail-address: hinweise@sws-p.de or via telephone under the following number: +49 991 379175 298.

Other forms of contact, for example via a contact form, are currently not in use and as such not usable for these purposes.

Confidentiality

According to the above-mentioned laws, the responsible persons are obliged to treat any incoming notices as confidential. Due to this, any information regarding your person or other protected forms of data will only be disclosed to a small group of people, who are necessary to properly process the given notice. However, in some cases the responsible persons may be legally required to disclose Personal Data.

Therefore, please provide us only with the information about yourself that is essential for the processing of this particular notice. In most cases your name does not need to be disclosed.

A legal requirement to disclose your Personal Data to third parties may exist, on the one hand, in cases where the responsible persons are legally obliged to disclose your data.

Please also note the remarks on passing on your data within the Group and external entities, under "Passing on of your data".

In the event of grossly negligent or intentional submission of notice containing false information, the laws and regulations protecting whistle blowers do not apply. This particularly includes the obligation to maintain confidentiality and protection against reprisal.

Responsibility and competence under data protection law

The STREICHER Group organises its whistle blower system via an external Ombudsman and further internal processing of incoming notice in MAX STREICHER GmbH & Co. KG aA.

Ombudsman

SWS Partner mbH, law office for economic law, Metzgergasse 2 - 4, 94469 Deggendorf,
Phone: +49 991 379175 298, e-mail: hinweise@sws-p.de. Contact person: Mr. Thomas Sedlmayr.

Responsible for the following data processing steps:

- Receiving notices
- Management of the digital mailbox
- Sighting and examination of notices

- Communication with the whistle blower (incl. final report on the facts according to HinSchG)
- Obtaining and managing of consent forms
- Transfer of notices and the obtained findings from the examination process

MAX STREICHER GmbH & Co. KG aA

Schwaigerbreite 17
94469 Deggendorf

hinweise@sws-p.de

Responsible for the following data processing steps:

- Management of the transferred notices and findings
- Communication with the whistle blower
- More extensive examination of the circumstances
- Documentation of the circumstances and if applicable, the implementation of necessary measures

Companies of the STREICHER Group

Responsible for data processing in the following process steps, provided that the notice refers to the respective company of the STREICHER Group:

- Management of the transmitted notice and findings
- Communication with the whistle blower
- Further examination of the facts
- Documentation of the facts and, if necessary, implementation of required measures

A list of the companies covered can be found at <https://www.streicher.de/streicher-gruppe/verbundene-unternehmen>.

If another company of the STREICHER Group is to be classified as the responsible party, MAX STREICHER GmbH & Co. KG aA acts as a processor for this company in the sense of Art. 28 DSGVO. The MAX STREICHER GmbH & Co. KG aA fulfills in these cases instruction-bound activities within the scope of the administration and passing on of the notices.

Persons affected by the processing

On the one hand, the whistle blower is affected by the processing within the whistle blower system. On the other hand, third parties may also be affected by the data processing, insofar as Personal Data are processed in the whistle blower system that are attributable to this third party.

Categories of data affected by the processing

Which data is processed depends largely on the information you provide via the whistle blower system.

In particular, the following data may be affected:

- Information about your person, as well as your relationship with the company (employee, business partner, etc.)
- Information about your whereabouts at a particular time
- Information about your activity

Processing of your Personal Data by the Ombudsman

In the function as Ombudsman of the STREICHER Group under the Whistle Blower Protection Act and the Supply Chain Due Diligence Act, the Ombudsman receives notifications and information.

If the notice was not handed in anonymously, further Personal Data regarding your person may be processed, besides your e-mail-address.

After an initial sighting of the information or documents you transmitted, the Ombudsman will decide the further proceedings. Should no breach of laws, regulations or standards arise from your notice, the matter will be closed. In this case, your personal

information will be processed for the legally required communication of the investigation results. In all other cases your explicit consent will be obtained from you for the information to be passed on to the unit of the STREICHER Group responsible for further processing or decision-making.

Legal basis for the processing of your Personal Data:

- Your data is being processed on the basis of your consent Art. 6 para. 1 p. 1 lit. a DSGVO.
- The processing of your data is necessary to fulfill contractual obligations or pre-contractual obligations Art. 6 para. 1 p. 1 lit. b DSGVO.
- The processing of your data is necessary to fulfill a legal requirement towards STREICHER Group as Ombudsman Art. 6 para. 1 p. 1 lit. c DSGVO.
- The processing of the data is necessary to protect your vital interests or those of another person Art. 6 para. 1 p. 1 lit. d DSGVO.
- The processing of your data is necessary to protect the legitimate interests of the Ombudsman or the STREICHER Group Art. 6 para. 1 p. 1 lit. f DSGVO.

To withdraw your consent, please informally contact the law office, for example via an e-mail to hin-weis@sws-p.de.

Processing of your Personal Data by the STREICHER Group

Data processing includes the processing of the initial notice of any subsequent communication with you as well as measures that are necessary to process the notice within the scope of the purpose of the whistle blower system.

The data processing may also include the merging of the notice with information from other sources, insofar as this is necessary for the intended processing of the notice.

The data processing serves the purpose of discovering and solving internal affairs connected to STREICHER Group as well as the prevention of damages or liability cases against STREICHER Group. This includes internal as well as any cases connected to the entire supply chain. These purposes are legitimate interests of STREICHER Group, which entitles them to process the data of the whistle blower and other affected parties under Art. 6 para. 1 p. 1 lit. f DSGVO. Insofar as the received notice as well as its processing and investigation correspond to the purposes of legal obligations STREICHER Group is bound by, the Personal Data will be processed in the necessary extent in accordance with Art. 6 para. 1 p. 1 lit. c DSGVO.

If the notice concerns criminal actions, or serious misconduct in the context of the employment relationship of one of the employees of STREICHER Group, the processing of data can be based on § 26 para. 1 p. 2 BDSG.

Passing on of your data

Within the scope of the whistle blower system your data is initially collected by the Ombudsman and, insofar as you have submitted the declaration of consent under data protection law, will be passed on to the STREICHER Group.

Via the whistle blower system, notice can be submitted which concerns all companies of the STREICHER Group. Accordingly, your data may be passed on to other companies of the Group, provided that your information concerns one of these companies and the data transfer is necessary for the processing of the facts.

Within the framework of the internal processing of the information, your data will be passed on to the responsible employees in compliance with the principles of confidentiality.

Furthermore, if necessary for the above-mentioned purposes, your Personal Data may be disclosed to external bodies (legal advisors, authorities, other government bodies, etc.).

Data security

The responsible parties shall also implement appropriate technical and organisational security measures within the meaning of Art. 32 DSGVO in order to protect Personal Data, in particular against accidental or intentional manipulation, loss, destruction or against attack by unauthorized persons. These security measures are continuously adapted in accordance with technological developments.

Deletion of Personal Data

The responsible parties will process your Personal Data for as long as is necessary for the purpose of clarifying and processing the reported facts. The data will be deleted in accordance with data protection law after the purpose of processing has been achieved and any relevant statutory retention periods have expired. An exception exists only if either your data is required in accordance with Art. 17 para. 3 lit. e DSGVO for the assertion of legal claims or for the defense against legal claims of third parties or the further processing is permissible for us in accordance with Art. 6 para. 1 p. 1 lit. f DSGVO.

Obligation to submit data

Under data protection law, you are not obliged to submit a report via the whistle blower system or to include specific information in the report. Without specific information, however, it may not be possible to process your notice.

Data subject rights

Cooperation between the responsible persons

You are entitled to your rights under the General Data Protection Regulation against all of the named responsible persons. Please contact the named contact details of the respective responsible person. If your data subject request requires an exchange of Personal Data between the responsible persons, your data will be exchanged as part of the cooperation between the responsible persons. The legal basis for this is our legitimate interest in effective cooperation pursuant to Art. 6 para. 1 p. 1 lit. f DSGVO or the legal obligation to share data subject inquiries pursuant to Art. 6 para. 1 p. 1 lit. c DSGVO. Examples of the obligation to disclose data are the information on the revocation of a declaration of consent to other entities entitled under the declaration of consent or the information on data deletion pursuant to Art. 19 DSGVO.

Right of access

In accordance with Art. 15 DSGVO, you have the right to request information from those responsible as to whether Personal Data relating to 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.

Right to rectification, erasure and restriction of processing

In accordance with Art. 16 DSGVO, you have the right to demand the rectification of any inaccurate Personal Data concerning you without undue delay. 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 DSGVO, you have the right to request that the responsible person erases Personal Data concerning you without undue delay, unless otherwise required by law.

In accordance with Art. 18 DSGVO, 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 objects to the erasure of the Personal Data and requests its limited use instead,
- the responsible person no longer needs the Personal Data for the purposes of processing, but the data subject needs it for the assertion, exercise or defense of legal claims,
- you object to the processing pursuant to Art. 21 DSGVO.

Right of revocation

You have the right to revoke your consent in whole or in part for the future in accordance with the above conditions. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

Right to objection

You have the right to object at any time to the processing of your Personal Data based on Art. 6 para. 1 p. 1 lit. e and lit. f DSGVO. The responsible parties will then no longer process the Personal Data unless you can demonstrate compelling legitimate grounds that override the interests, rights and freedoms of the data subject.

Right of complaint supervisory authority

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

A list of data protection supervisory authorities with their contact details can be found at:

<https://www.bfdi.bund.de/DE/Service/Anschriften/Laender/Laender-node.html;jsessionid=ABE832F21E9EF77B8261A9802B8FE05C.intranet241>

Data Protection Officer

For the companies of the STREICHER Group a data protection officer has been appointed, who is active according to Art. 37 ff. DSGVO.

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In accordance with the requirements of the Federal Data Protection Act and the General Data Protection Regulation, the Ombudsman office is not obliged to appoint a data protection officer.

Status of the data protection information

Constant development makes it necessary to adapt our data protection principles from time to time. We reserve the right to adjust the data protection information at any time.

(Status: 11/2022)