

1 Information on data protection for whistleblowers

In the following, we would like to inform whistleblowers about the processing of their personal data during the collection, processing and clarification of reports that have been sent to us in the context of using our whistleblower system, as well as about the rights to which they are entitled under data protection law. This information on data protection only applies in the event that the person providing the information voluntarily waives his or her anonymity vis-à-vis the ombudsman service commissioned by us or directly vis-à-vis us.

2 Data controller responsible for data processing and its data protection officer

The data controller responsible for data collection and processing is the company of the ETO GRUPPE to which the whistleblower is submitting a report. The contact details of these companies are:

ETO GRUPPE TECHNOLOGIES GmbH	Hardtring 8 78333 Stockach	info@etogruppe.com
ETO MAGNETIC GmbH	Hardtring 8 78333 Stockach	info@etogruppe.com
ETO SENSORIC GmbH	Löffelholzstraße 20 90441 Nuremberg	info@etogruppe.com
EKS Elektromagnetik GmbH	Steinbeisstraße 50 71665 Vaihingen	info@etogruppe.com
ETO DYNAMIC Digital GmbH	Gebhardstraße 7 88046 Friedrichshafen	info@etogruppe.com

You can reach our data protection officer at the contact details above or by e-mail at datenschutz@etogruppe.com.

The data protection officer is exclusively responsible for issues relating to data protection law. He cannot provide any information on the content or course of proceedings conducted at the ombudsman's office, or the responsible body.

3 Data processing information

Data subject categories:	Persons providing information
Purpose of processing:	Our whistleblower system is designed to receive and process reports of suspected violations of the law or internal regulations in a secure and confidential manner that is, if desired, also anonymous. We process the personal data of whistleblowers exclusively for the purpose of processing information, and in order to comply with legal obligations to provide proof and documentation. Intentionally false information may constitute a criminal offense under the German Penal Code, and so we also process personal data for our legal defense and to enforce legal claims.
Data categories:	We will only process personal data that the whistleblower voluntarily sends to us via the legal ombudsman's office commissioned by us, thereby waiving his or her anonymity. In detail, this includes the first name and last name of the whistleblower, if the whistleblower has disclosed his or her identity, the contact data provided by the whistleblower, the fact that the whistleblower has submitted a report via our whistleblowing system, the channel used for this purpose, and the date and time of the report's submission, and all other personal data of the whistleblower and of the persons named in the report that result from the content of the report or can be derived from it.
Legal basis:	<p>The legal basis for the processing of personal data within the framework of the whistleblower system is our legitimate interest in the detection and prevention of malpractices and violations of pertinent regulations, the associated prevention (and future avoidance) of damage and liability risks, as well as the enforcement of rights, legal defense or assertion of rights pursuant to Art. 6 (1) f GDPR and Section 26 (1) German Data Protection Act (BDSG), if and to the extent that a report that has been received concerns employees of the data controller, and the processing serves the prevention of criminal offenses or other legal violations related to the employee relationship.</p> <p>If the processing of personal data in the context of the whistleblower system takes place for the fulfillment of legal obligations, in particular, from Directive (EU) 2019/1937 on the protection of persons who report infringements of Union law (so-called "Whistleblower Directive") and the Whistleblower</p>

Information on data protection for whistleblowers

Protection Act, Art. 6 (1) lit. c GDPR shall serve as the legal basis for the processing.

The legal basis for the processing of identification data of whistleblowers voluntarily provided via any channel of our whistleblowing system is the consent of the whistleblower pursuant to Art. 6 (1) lit. a GDPR, as well as pursuant to Art. 9 (2) lit. a GDPR, if (and to the extent that) special categories of personal data within the meaning of Article 9 (1) GDPR are included. In these cases, consent is given by specifying the identification data, since information can also be provided anonymously without consent.

Recipient categories:	For the above-mentioned purposes, the personal data of whistleblowers will be passed on within the responsible entity and, if necessary, within our group of companies exclusively for the purpose of persons who need this to process the whistleblowing report, and to clarify the facts of the case in more detail. In such cases, we may also disclose personal data of whistleblowers, if necessary, to law firms, consultants, courts or public authorities that assist or advise us in processing the whistleblowing report.
Third country transfer:	A transfer of personal data to recipients in countries outside the EU or the EEA is not envisaged.
Data sources:	For the purpose of processing, we only use personal data provided to us by the whistleblower as part of the whistleblowing system.
Provision obligation	Whistleblowers can submit reports via the ombudsman's office we have commissioned without disclosing their personal data. However, without the provision of personal data and, if applicable, without the provision of further data during the clarification of the whistleblowing report, the processing and clarification of the report (or even communication with the whistleblower themselves) may be more difficult and, in some cases, impossible.
Criteria for deletion:	We delete the personal data of whistleblowers two months after the case has been closed, unless the documents and data are still required as part of (criminal) proceedings, are subject to a longer statutory retention period, or we have a demonstrable legitimate interest in storing the data for a longer period. In these cases, the data will be deleted or destroyed immediately subsequent to expiry of the statutory retention periods or after

our legitimate interest and any subsequent retention periods no longer apply.

4 Revocation of consent issued

If data is processed on the basis of legitimate interests of the data controller pursuant to Article 6 (1) (f) GDPR, the data subject has the right to register their objection to the processing at any time on grounds relating to his or her particular situation pursuant to Article 21 GDPR. We will then no longer process the data unless there are demonstrably compelling and legitimate grounds for said processing, which override the interests, rights and freedoms of the data subject, or the processing serves to assert, exercise or defend legal claims.

5 Data subject rights

Every data subject has the right vis-à-vis us – under the respective legal conditions and to the respective legal extent – to the disclosure of information about the personal data concerning him or her (Art. 15 GDPR), as well as to its rectification (Art. 16 GDPR), deletion (Art. 17 GDPR) or restriction of processing (Art. 18 GDPR), as well as the right to data portability (20 GDPR) and not to be subject to a decision based solely on automated processing – including profiling (Art. 22 GDPR). Furthermore, every data subject has the right to lodge a complaint with a supervisory authority (Art. 77 GDPR). The right to lodge a complaint may be asserted, in particular, before the supervisory authority for the place of the alleged infringement, or your place of residence.