

## Whistleblower System: Information for Whistleblowers

Compliance with legal requirements and internal rules is a high priority for us. To counteract undesirable developments, violations should be identified at an early stage. So, we can initiate countermeasures and prevent possible damage to employees, customers, suppliers, service providers and the company.

*Our whistleblower system is designed to give you the opportunity to report violations of legal regulations and thus contribute to their detection.*

For example, you can report violations with the following focus areas:

- » Data protection and security of network and information systems
- » Money laundering and terrorism
- » Public health
- » Public procurement
- » Product safety
- » Environmental protection

In the event that you have specific, well-founded indications of serious violations of the law on our premises or suspect such violations, we have commissioned an expert and reliable service provider (“reporting office”):

UIMCert GmbH, Otto-Hausmann-Ring 113, D-42115 Wuppertal, Germany

Telefon: +49 202 946 772 66 111

E-Mail: [meldestelle.siegert@uimcert.de](mailto:meldestelle.siegert@uimcert.de)

Currently, there are no regulatory reporting channels on a national or EU level. As soon as these are established, we will inform you about them.

Do you have any further questions? Please take a look at our [FAQ](#). Alternatively, you can contact the above-mentioned provider directly.

Please refer to the data protection information [sheet](#).

## Information Sheet according to Art. 13 and 14 DSGVO Whistleblowing Reporting Channels

A. Name of Controller	Reporting office is UIMCert GmbH.
B. Contact details controller	Otto-Hausmann-Ring 113, 42115 Wuppertal
C. Contact details data protection official	datenschutz@uimcert.de / +49 202 946 7266 100
D. Categories of personal data	Data of whistleblower, data of reported parties and data of third parties as well as description of reported violation and measures taken
E. Purpose of data processing	Uncovering violations of legal requirements and compliance rules, also to avert damage to the company
F. Legal basis for data processing	Processing of data by reporting office and investigating bodies pursuant to Article 6(1) lit. f DSGVO in conjunction with Articles 2, 8, 9, 16, 18 Whistleblower Directive (EU Directive 2019/1937).  Disclosure of identity outside legal necessity only with consent pursuant to Art. 6 (1) lit. a DSGVO
G. For legitimate interest: legitimate interests of controller	Uncovering violations of legal requirements and compliance rules, also to avert damage to the company
H. Recipients/categories of recipients	Company affected by the report; law enforcement authorities, administrative authorities, court, if applicable
I. Possible third country transfer	./.
J. Adequate level of data protection in the case of third country transfers	./.
K. Retention period	3 years from claim or knowledge of the violation, if the report falls within the scope of the whistleblower reporting procedure (otherwise usually 2 months)
L. Necessity to provide the personal data (where data are collected from the data subjects)	<input checked="" type="checkbox"/> by consent <input checked="" type="checkbox"/> required by law <input type="checkbox"/> required by contract <input type="checkbox"/> required for the conclusion of a contract <input type="checkbox"/> Obligation to provide the data. In case of non-provision, these consequences are possible: [bitte ausfüllen]
A. Origin of the data (where personal data have not been collected from the data subjects)	Whistleblower, data collected in the course of a further research
B. Automated decision making	<input checked="" type="checkbox"/> no <input type="checkbox"/> yes

**We hereby inform you that** pursuant to Article 15 et seq. DSGVO, you have **the right to obtain information** about the personal data in question, as well as the right to **rectification, erasure or restriction** of processing, the **right to object** to processing and the right to **data portability**. You also have **the right of complaint** to a data protection supervisory authority pursuant to Article 77 GDPR if you consider that the processing of your personal data concerning infringes this Regulation. If the processing is based on your consent (cf. Art. 6(1) lit. a, Art. 9(2) lit. a DSGVO), you also have the **right to withdraw** your consent at any time without affecting the lawfulness of the processing carried out on the basis of the consent until the withdrawal.

# FAQ Whistleblowing

## **What is the reporting office for?**

Our whistleblower system or reporting office is intended for reporting violations of laws and internal rules. The reporting system is not intended for complaints about products, services, employees, etc.

## **Who can use the reporting office?**

The reporting office has been set up for persons who have obtained information about violations in a professional context. This means that not only our employees, but also all other (external) persons who work under the supervision and management of contractors, subcontractors and suppliers can report potential violations to our reporting office.

## **What do I have to worry about when I file a report?**

As a whistleblower, if you report violations of law and internal rules or attempts to conceal such violations, you will be protected. However, the whistleblower system may not be used to make false accusations or intentionally report false information. You should therefore not expect any disadvantages, provided that you have made your report on the basis of specific indications, and you are convinced of the accuracy of the information provided to the best of your knowledge and belief. We will follow up any indications of violations by means of internal investigations.

## **Who is protected by whistleblower protection?**

Every whistleblower who uses the reporting channels (see above) is protected. Additionally, intermediaries, colleagues or relatives of the whistleblower who also have a professional connection to the whistleblower's employer, to a client of the whistleblower or to a recipient of services provided by the whistleblower are also protected.

## **Is it possible to submit a report anonymously?**

It is possible to submit your notice anonymously, but we want to encourage you not to do it. Your notice is submitted to an external provider which forwards your information to us anonymously. We have opted for an external provider to provide you with particularly good protection. A non-anonymous report enables a direct dialog with you and improves the chance of resolving violations quickly. However, if you would like to remain anonymous, please include as many details as possible and, if available, also documents that support your suspicion. Please keep in mind: Your report can only make a difference in case that the evidence we receive

allows sufficiently specific investigation approaches and possibilities of argumentation and proof.

## **Will I receive feedback?**

On one hand, we will confirm receipt of your report via the external provider on a timely manner. On the other hand, we will inform you about the planned/implemented follow-up measures after an appropriate processing time (usually after 3 months). Of course, this is only possible if you have not submitted the report anonymously.

## **What happens after a report has been filed?**

We follow up on all reports. In connection with their processing, we ensure confidentiality and fairness in our dealings with the whistleblower. All information is treated as strictly confidential and is only reviewed by persons who have committed themselves to confidentiality or are sworn to secrecy. However, fairness also requires us to take into account the interests of the employees concerned (who may be "accused") that are worthy of protection. We therefore trust that no information will be provided with dishonest intent. Nor, of course, is any denunciation desired.

## **Will my data be passed on to third parties?**

Any further clarification that may be required will be carried out within the framework of the legal regulations to be complied with in each case, in particular in accordance with the requirements of data protection law. If disclosure of your identity is necessary and reasonable in criminal proceedings at the request of the law enforcement authorities or ordered in administrative proceedings or a court decision, we will inform you of this prior to disclosure, unless this would jeopardize the investigation or court proceedings. For further information, please take a look to the information sheet pursuant to Articles 13 and 14 of the General Data Protection Regulation.

## **How long are the reports kept?**

Please have a look to the information sheet in accordance with Art. 13 and 14 of the General Data Protection Regulation.