

## Information and disclosure obligations Whistleblower system - page 1

The careful and legally compliant handling of personal data is very important to us. This also applies in particular to data in connection with information from the internal reporting system. The following information shows you how we handle your personal data in the context of information from the internal whistleblower system for the preventive prevention and/or detection of violations of applicable law or company guidelines (e.g. fraud or corruption as well as other criminal offences).

Personal data is any information relating to an identified or identifiable natural person (hereinafter 'data subject'). Personal data therefore includes, for example, first and last name, address, date of birth, e-mail address or telephone number.

1. Name and contact details of the person responsible for processing the data:	2. Contact details of the data protection officer:
Schulz & Sohn GmbH Chemie-Erzeugnisse Höherweg 327 40231 Düsseldorf Telefon: +49 211 88 22 80-0 <a href="mailto:info@schulzchemie.com">info@schulzchemie.com</a>	DAWOCON GmbH An der Müllerwiese 10 51069 Köln 0221 68 00 376-7 <a href="mailto:dsb@dawocon.de">dsb@dawocon.de</a>

### 3. Purpose of the processing

Schulz & Sohn GmbH processes the following types of personal data, among others, as part of the and processing of reports in the internal reporting system:

- Information on the personal identification of the whistleblower, such as first and last name, gender, address, telephone number and e-mail address;
- Employment status at Schulz & Sohn GmbH;
- Information on affected persons, i.e. natural persons who are designated in a report as a person who committed the violation or with whom the designated person is associated. Such information includes, for example, first and last name, gender, address, telephone number and e-mail address or other information that allows identification;
- Information about offences that may allow conclusions to be drawn about a natural person.

Schulz & Sohn GmbH processes the personal data for the purpose of investigating the reports in order to prevent, detect and/or follow-up on violations of applicable law or company policies (such as measures to verify the validity of the allegations made in the report and, if necessary, to take action against the reported violation, including through internal enquiries, investigations, prosecutions, measures to (re-)recover funds or conclude the proceedings).

### 4. Legal basis of the processing:

We only process personal data of the whistleblower if the whistleblower has given their consent in accordance with Art. 6 para. 1 lit. a GDPR. Accordingly, processing is only lawful if the data subject has consented to the processing of their personal data for one or more specific purposes.

## Information and disclosure obligations Whistleblower system - page 2

We process the information on employee status, the information on the data subjects and other information that allows conclusions to be drawn about natural persons on the basis of Art. 6 para. 1 lit. f GDPR. Accordingly, processing is lawful if it is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

Depending on the individual case to be examined, our legitimate interest lies in the processing of reports in order to be able to take follow-up measures, such as measures to verify the validity of the allegations made in the report and, if necessary, measures to eliminate the reported violation, including internal investigations, investigations, criminal prosecution measures, measures to (re)recover funds or conclude the proceedings. Whether the interests or fundamental rights and freedoms of the data subject conflict with such data processing is examined on a case-by-case basis, including with regard to the offence.

If necessary, we process personal data of employees on the basis of Section 26 (1) sentence 2 BDSG. Accordingly, personal data of employees within the meaning of Section 26 (8) BDSG may be processed to uncover criminal offences if there are factual indications to be documented that give rise to the suspicion that the person concerned has committed a criminal offence in the employment relationship.

The provision of data via a notification is neither contractually required nor necessary for the conclusion of a contract. Depending on the individual case, there may be legal obligations to provide us with a report. However, it is necessary to process the data in order to process and investigate the report properly.

### 5. Categories (Art. 13, 14 GDPR) of recipients

Personal data will only be transferred to third parties if there is a legal basis for this. This is particularly the case if the transfer serves to fulfil a legal obligation to provide information, report or transfer data, if you have given your consent or if a balancing of interests justifies this. In addition, external service providers, such as external data centres or telecommunications providers, process personal data on our behalf as processors. Depending on the responsibility for the report and for the effective initiation of follow-up measures, the personal data may be forwarded to our relevant specialist departments. Under certain circumstances, we may also transfer the personal data to state security and/or law enforcement authorities, other competent authorities and/or persons obliged to maintain confidentiality, such as auditors/lawyers.

### 6. Deadlines envisaged for the erasure of the various categories of data

The data is generally retained until the follow-up measures have been concluded. As a rule, the data of a report is deleted two months after the legally binding conclusion of the proceedings, unless the initiation of further legal steps requires further retention (e.g. initiation of criminal or disciplinary proceedings). Personal data in connection with reports will be deleted by us immediately if we consider them to be obviously irrelevant.