

## Privacy Policy

Muhr und Bender KG (hereinafter referred to as "**We**"/"**Us**") takes the protection of personal data very seriously. This privacy policy informs about what personal data we collect from you when using the Mubea Grievance System and how we use such data.

We ensure compliance with the applicable data protection regulations through appropriate technical and organizational measures.

### Responsible body and data protection officer

Responsible for the processing of personal data is

Muhr and Bender KG

Mubea-Platz 1, 57439 Attendorn

You can find the contact details in the legal notice.

The data protection officer of the company can be reached under the following email address: [datenschutz@via-consult.de](mailto:datenschutz@via-consult.de).

The technical implementation of the Mubea Grievance System is carried out on our behalf by EQS Group AG ("**EQS**").

### Personal data

In principle, it is possible to use the Mubea Grievance System - as far as legally permissible - without providing personal data. However, you can voluntarily provide personal data as part of the reporting process, in particular information about your identity, first and last name, country of residence, telephone number or email address.

Generally, we do not request and process any special categories of personal data, e.g. information on ethnic origin, religious and/or ideological beliefs, trade union membership or sexual orientation. However, such special categories of personal data can be voluntarily disclosed by you due to free text fields in the report form.

The report submitted by you may also contain personal data of third parties to which you refer in your report. In justified cases of suspicion, the persons concerned will be given the opportunity to comment on the report. Your confidentiality is, however, also protected in this case, as the persons concerned will not be given any information about your identity - as far as legally possible - and your report will be used in such a way that your anonymity is not jeopardized.

### Purpose and legal basis of processing

The Mubea Grievance System enables you to contact us and submit reports on violations of applicable law and internal guidelines. We process your personal data in order to review the report submitted by you via the Mubea Grievance System and to investigate the suspected violations. In doing so, we may have further questions to you. We only use communication via the Mubea Grievance System for this purpose.

The corresponding processing of your personal data takes place on the basis of your consent given in the report through the Mubea Grievance System (Art. 6 para. 1 lit. a Data Protection Directive 95/46/EG, GDPR).

Furthermore, we process your personal data insofar as this is necessary to fulfill legal obligations. This includes, in particular, reports on criminal, competition and labor law violations (Art. 6 para. 1 lit. c GDPR).

Finally, your personal data will be processed if this is necessary to protect our legitimate interests or the interests of a third party (Art. 6 para. 1 lit. f GDPR). We have a legitimate interest in the processing of personal data for the prevention and detection of violations within the Mubea-Group, to check the legality of internal processes and to safeguard our integrity.

If you disclose special categories of personal data to us, we process these on the basis of your consent (Art. 9 para. 2 lit. a GDPR).

We also use your personal data in anonymized form for statistical purposes.

We do not intend to use your personal data for purposes other than those listed above. Otherwise, we will obtain your prior consent to do so.

## **Technical implementation and security of your data**

The Mubea Grievance System includes an option for anonymous communication via an encrypted connection. Your IP address and your current location will not be stored at any time when you use the system. After submitting a report, you will receive login data to the protected mailbox of the Mubea Grievance System so that you can continue to communicate with us in a secure manner.

We maintain appropriate technical measures to ensure data protection and confidentiality. The data you provide will be stored in a specially secured EQS database. All data stored in the database is encrypted by EQS in accordance with the current state of the art.

## **Transfer of personal data**

We operate internationally and have locations in various countries within and outside the European Union. Only specially authorized employees of Muhr und Bender KG are permitted to access the stored data. Insofar as this is necessary to fulfil the stated purpose, specially authorized employees of our subsidiaries may also be entitled to access the data. This is particularly the case if the investigation of your report is carried out in the country concerned. All employees authorized to review data are expressly obliged to maintain confidentiality.

In order to fulfill the stated purpose, it may also be necessary for us to transfer your personal data to external bodies such as law firms, criminal or competition authorities, within or outside the European Union.

If we pass on your personal data within the Group or externally, a uniform level of data protection is ensured by means of internal data protection regulations and/or corresponding contractual agreements. In all cases, the responsibility for data processing remains with us.

Finally, we transfer your personal data to EQS to the extent described above for technical implementation. For this purpose, we have concluded a data processing agreement with EQS to ensure data protection.

## **Duration of storage**

We only store personal data for as long as it is necessary to process your report or for as long as we have a legitimate interest in storing your personal data. Data may be stored for longer if this has been provided for by European or national legislation to fulfill legal obligations, such as retention obligations. Thereafter, all personal data will be deleted or anonymized.

## **Your rights**

If you have provided personal data, you have the right of information, correction and deletion of the personal data. You can also restrict the processing or request its transfer to another controller.

Furthermore, you have the right to object to the processing of your personal data at any time on grounds relating to your particular situation.

You have the right to withdraw your declaration of consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You can assert these rights by sending an informal notification to the controller or our data protection officer named above. If you have asserted the right of rectification, erasure or restriction of processing against us, we are obliged to notify all recipients to whom we have disclosed the personal data concerning you of this rectification or erasure of the data or restriction of processing, unless this is impossible or involves a disproportionate effort. We will inform you about these recipients on request.

Finally, without prejudice to any other administrative or judicial remedy, you have the right to submit a complaint to a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.