

# Data protection information in accordance with Art. 13 DSGVO - Parts Europe GmbH whistleblower system

This data protection information informs you about the processing of your personal data by Parts Europe GmbH in the context of the whistleblower system. According to Art. 4 No. 1 DSGVO (Basic Data Protection Regulation), your personal data includes all information that relates or can be related to your person, in particular by means of assignment to an identifier such as a name or to an organizational or personnel number by which your person can be identified.

### 1. Personal data

During the whistleblower reporting process, the Confidence Office collects and processes information (both in paper format and in digital form). These data may include any data reported by you or disclosed in the course of further processing of the case: - personal data (name, private or business address, telephone number, gender, e-mail address) - Contract data (type of employment classification, degree of employment, start/end of employment) - organizational data (job title, supervisor, location, management level). You are not required to provide your personal data when using our whistleblower system. However, providing us with your personal data enables us to make inquiries and investigate the reported incident more quickly. If you do not provide us with personal information, we may have to stop investigating the incident due to incomplete or incorrect information. Parts Europe GmbH collects, processes and uses your personal data solely for the purpose of handling reports of actual or potential criminal offenses, misdemeanors and serious, persistent violations of internal regulations, provided that there is a legal basis for doing so, with the goal of uncovering misconduct by Parts Europe GmbH employees and its business partners and containing or correcting the negative consequences of such misconduct.

### 2. Use of the data

Below you can see the purposes of use, including the legal basis:

- Contacting you in case of queries regarding the notification, Art. 6 (1) lit. a, f DSGVO.
- Answering your queries about the reported facts, Art. 6 para. 1 lit. a, c, f DSGV
- Forwarding to the internal departments suitable for clarification (e.g. company management, HR, IT, legal, data protection officer), Art. 6 para. 1 lit. f DSGVO.
- Forwarding to the data subject to fulfill the right to information, Art. 6 para. 1 lit. f DSGVO
- Forwarding to professional secrecy holders (lawyers) or other third parties separately bound by contract to secrecy for further clarification of the reported incident and, if necessary, for assertion of civil claims against the reported persons And forwarding to law enforcement agencies for prosecution purposes in the event of criminally relevant actions by the reported persons, Art. 6 (1) lit. c, f DSGVO, Section 28 BDSG
- Prosecution of abusive reports, Art. 6 para. 1 lit. f DSGVO.

We process your personal data only within the scope of the stated purposes and to the extent necessary for these purposes.

#### 3. Consent

By submitting your report, you consent to Parts Europe GmbH processing and storing your personal data provided therein for the purposes stated in this Privacy Policy, such as for the purpose of investigating an incident reported by you. You also consent to the processing of personal data beyond the conclusion of an investigation for as long as is necessary for a proper



evaluation of the incident with regard to further action. You can revoke your consent at any time with effect for the future. Please address the revocation to our data protection officers.

Your data protection rights are governed by Chapter III (Art. 12 et seq.) of the GDPR. According to these regulations, you have a right to information about the personal data stored about you, about the purposes of processing, about any transfers to other bodies and about the duration of storage. To exercise your right to information, you may also receive extracts or copies. If data is incorrect or no longer required for the purposes for which it was collected, you may request that it be corrected, deleted or restricted from processing. If your particular personal situation gives rise to grounds for objecting to the processing of your personal data, you may object to processing insofar as the processing is based on a legitimate interest. In such a case, we will only process your data if there are special compelling interests for this.

# 4. Disclosure of your personal information

We do not pass on your data to third parties and will only do so without your consent if we are obliged to do so by law or on the basis of a court or official decision. In individual cases, your personal data may be transferred to the law firms we have engaged or other persons charged with clarifying the facts of the case.

# 5. Body responsible for the processing of your personal data

The competent and responsible body for the collection, processing and use of your personal data is Parts Europe GmbH. The personal data is stored and processed in the digital databases of the trust center on the servers Parts Europe GmbH. The concept as well as the technical installation is designed in such a way that only a narrowly defined group of specially authorized persons is authorized to access the data and that any other access or other knowledge of the data is excluded according to the state of the art as well as internal specifications.

If you contact us via Trusty, your data will also be stored on a server protected by Trusty. For more details, please refer to Trusty's privacy policy, which will be displayed to you before your data is stored.

# 6. Questions or complaints about the processing of your personal data

If you have a question about the processing of your personal data and information, you can contact our data protection officer (<u>privacy@partseurope.eu</u>).

### 7. Duration of storage

Parts Europe GmbH processes personal data for as long as knowledge of the data is required for the fulfillment of legal obligations or as required for the purposes of the investigation and the subsequent implementation of civil or criminal measures against parties involved, if applicable. In this regard, we are guided by the statutory periods of limitation under civil and criminal law as part of a case-by-case review. In addition, we store your personal data insofar as statutory retention periods exist in connection with a report. This can play a role in particular in the case of facts relevant under tax law, for which Section 147 of the German Fiscal Code (AO) stipulates a storage period for business letters including e-mails of ten years.