

Privacy Statement TQ Group Whistleblower System and Complaint Procedure

TQ Group takes the protection of personal data very seriously. With this data protection notice, we explain to you in accordance with Art. 13 GDPR which personal data we collect from you when you use our TQ Whistleblower reporting office and how we process such personal data. We ensure compliance with the applicable data protection regulations through appropriate technical and organizational measures.

Whistleblowers within and outside TQ Group make an important contribution to uncovering misconduct and preventing and eliminating negative consequences of this misconduct by reporting feared or actual violations of applicable laws or the principles that apply within our group of companies.

Responsible entity and Data Protection Officer

Responsible for the processing of your personal data is

TQ Systems GmbH
Mühlstraße 2, Gut Delling
82229 Seefeld, Germany
Commercial Register No.: HRB 105018
Managing Directors: Detlef Schneider, Rüdiger Stahl, Stefan Schneider
Phone: +49 8153 9308-0
E-Mail: info@tq-group.com
Web: www.tq-group.com

We have appointed a Data Protection Officer:

Rene Raumanns
SNS Systems GmbH
Buchenberger Strasse 18
87448 Waltenhofen
Germany

Phone: +49 (0) 6102 7751 500
E-mail: datenschutz@sns-systems.de
Web: www.sns-systems.de

Legal Basis and Purposes of Data Processing

Processing of personal data is carried out for the purpose of proper and orderly processing of the information sent to the TQ Whistleblower Reporting Office based on Art. 6 Para. 1 lit. c and lit. f GDPR in conjunction with. § 10 HinSchG. The relevant legal obligations in this respect result, among other things, from the European Whistleblower Directive 2019/1937 and the legislation enacted for its national implementation in the German Whistleblower Protection Act as well as the EU Supply Chain Directive and the legislation enacted for its national implementation in the German Supply Chain Due Diligence Act.

If the processing of personal data for the aforementioned purposes is based on the whistleblower's consent (Art. 6 (1) (a) GDPR, this consent is always given voluntarily and can be freely revoked at any time, i.e. upon receipt of the revocation, the data processing based on consent may not be continued.

Insofar as the data processing is based on our legitimate interest in uncovering, stopping or preventing violations of applicable law, the ZVEI-VDMA Code of Conduct or other human rights and environmental obligations (Art. 6 (1) f GDPR in conjunction with Sections 30, 130 OWiG, Section 10 HinSchG), these interests outweigh the legitimate interests of the whistleblower or those of the other persons concerned in view of the confidential handling of the information in accordance with this data protection declaration. We have a legitimate interest in the processing of personal data for the prevention and detection of viola-

tions, breaches of duty or criminal offenses within our company, for checking the legality of internal processes and for maintaining the integrity of our company, as well as our legitimate interest in the associated prevention of damage and liability risks for our company.

We process the aforementioned personal data in particular for the following purposes:

- Examining whether the information provided to us via the TQ whistleblower reporting office appears plausible and suggests a violation of laws or other legally binding requirements or breaches of duty under the employment contract;
- If necessary, further clarification of the reported facts with regard to any violations of laws or other legally binding requirements or (labor-) contractual breaches of duty;
- If necessary, further clarification for the purpose of exonerating wrongly suspected employees or other persons;
- If necessary, for the defense of threatened economic and other disadvantages and for the assertion or and enforcement of rights of our company and
- If applicable, the fulfillment of any obligations to cooperate on the part of our company within the scope of investigations by law enforcement or other authorities.

Data origin and data categories

The TQ Whistleblower Reporting Office processes and stores the following categories of personal data, insofar as the report is made non-anonymously:

- Personal identification, contact and communication data (first and last name, address, e-mail address, telephone number).

Recipients of the personal data

As a matter of principle, your data will not be passed on by the TQ Whistleblower Reporting Office and will remain with the TQ Whistleblower Reporting Office. All persons authorized to inspect the data are expressly obligated to maintain strict confidentiality. In the event that one of the exceptions listed in § 9 HinSchG applies, the information about the identity of the whistleblower as well as other information obtained may be passed on to the responsible supervisory authority or the respective responsible body (e.g. courts, authorities) under the respective conditions; the same applies in cases of data processing with the express consent of the whistleblower.

In certain cases, we have an obligation under data protection law to inform the person(s) named in your report of the allegations made against them. This is required by law, for example, if it is objectively determined that providing information to this person(s) can no longer affect the clarification of the reported facts. If you have not submitted your report anonymously, we will not disclose your identity as a whistleblower - insofar as this is legally permissible - and we will also ensure that no other conclusions can be drawn about your identity. Please note that in the event of a knowingly false report with the intention of discrediting another person, we may be obliged to disclose your identity to that person.

Your personal data will only be transferred to the above-mentioned recipients if this is necessary and legally permissible. A data transfer to third parties or third countries does not take place.

Duration of the storage of personal data

We only store the data for as long as is necessary for the respective purpose. The contents and data of the report submitted to the TQ Whistleblower Reporting Office, as well as any further documentation within the scope of processing the report, are stored for the respective processing period and are generally deleted within two months after completion of the respective investigation, unless they need to be further processed for other purposes, e.g., to fulfill retention obligations or to exercise, assert or defend legal claims. Longer retention of the documentation is possible, in particular, in order to fulfill requirements under the HinSchG or other legal provisions, as long as and to the extent that this is necessary and proportionate; this also applies in the event of any legal proceedings.

Protection of minors

Individuals under the age of 16 should not submit personal information to the TQ Reporting Center without the consent of their parents or guardians.

Technical implementation

The responsible body takes over the technical operation of the application on behalf of the TQ reporting center.

Please note that communication to the TQ Reporting Center via e-mail to the e-mail address reporting-office@mop-beratung.de may be insecure without simultaneous data encryption.

Your right as an affected party:

- Right to information about your personal data stored and its processing (Art. 15 GDPR). The right to information does not exist if the information would disclose information that must be kept secret due to the overriding legitimate interests of a third party;
- Right to data correction if your data should be incorrect or incomplete (Art. 16 GDPR);
- Right to resolve the data stored about you (Art. 17 GDPR). However, the right to erasure of personal data does not exist, in addition to the exceptions mentioned in Art. 17 (3) GDPR, if erasure is not possible or only possible with disproportionate effort due to the special nature of the storage. In these cases, the restriction of processing takes the place of erasure (Art. 18 GDPR).
- Right to restriction of data processing, insofar as the data have been processed unlawfully, the data are required for the assertion, exercise or defense of your legal claims or, in the event of an objection, it has not yet been determined whether the interests of the collecting agency outweigh those of the data subject (Art. 18 para. 1, lit. b to d GDPR).
- We are obliged to inform all recipients to whom your data has been disclosed about a correction or deletion of your data or a restriction of processing. This does not apply only if this proves impossible or involves a disproportionate effort. You have the right to be informed by us about these recipients (Art. 19 D-SGVO)
- Right to restriction of processing for the duration of the accuracy check, insofar as the accuracy of the personal data is disputed;
- Right to object informally to certain data processing, unless there is a compelling public interest in the processing that overrides your interests and no legal provision requires processing (Art. 21 GDPR). If you object, we will no longer process personal data relating to you, unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing serves the assertion, exercise or defense of legal claims.
- You have the right to complain to any supervisory authority of your choice, in particular in the EU member state of your residence, workplace or the place of the alleged infringement, if you believe that the processing of personal data concerning you by us violates the law (Art. 77 GDPR).

The supervisory authority responsible for TQ-Systems GmbH is the

Bavarian State Office for Data Protection Supervision (BayLDA), Promenade 18, D-91522 Ansbach

Postal address: P.O. Box 1349, D-91504 Ansbach, Germany

Phone: +49 (0)981 180093-0; Fax: +49 (0)981 180093-800
E-mail: poststelle@lda.bayern.de ; Internet: www.lda.bayern.de

You can access the complaint form of the Bavarian State Office for Data Protection Supervision via the following link: <https://www.lda.bayern.de/de/beschwerde.html>