

## Data protection information for reporting and checking compliance notices

The protection of privacy in the processing of personal data and the security of all business data are important concerns for JOPP and are taken into account in all business processes. Personal data - insofar as a compliance notice is issued - will be treated confidentially and only in accordance with the statutory provisions:

### I. Responsible for Data Processing

Jopp Holding GmbH, Am Donsenhaus 3 - 6 in 97616 Bad Neustadt, Germany, is responsible for the screening of compliance notices as well as for the further procedure including follow-up measures.

### II. Purposes of Data Processing

The data processing is carried out for the following purposes: To comply with EU Directive 2019/1937 and local implementing laws (in Germany: Whistleblower Protection Act - HinSchG), to create the possibility to submit notices in terms of the Whistleblower Protection Act, to comply with the requirements of supply chain due diligence laws (in Germany: Section 8 Supply Chain Due Diligence Act - LkSG) and to process and manage other compliance notices.

### III. Type of Data Processed

Personal data is any information relating to an identified or identifiable natural person, such as names, addresses, telephone numbers, e-mail addresses, contractual, booking and billing data, which is an expression of the identity of a natural person.

Personal data is only processed at JOPP if there is a legal basis for doing so or if we have received consent in this regard.

#### IV. Legal Basis for Data Processing

Art. 6 para. 1 lit. c DSGVO in conjunction with EU Directive 2019/1937 in conjunction with implementation laws (in Germany: § 10 HinSchG), Art. 6 para. 1 lit. c DSGVO in conjunction with supply chain due diligence laws (in Germany: § 8 LkSG), Art. 6 para. 1 lit. a DSGVO for whistleblowers who voluntarily disclose their identity, Art. 6 para. 1 lit. b DSGVO in conjunction with § 26 BDSG for compliance officers.

#### V. Storage Period

The stored data will be deleted three years after the conclusion of the procedure, unless otherwise required by mandatory legal requirements. The documentation may be kept longer if this is necessary and proportionate to meet legal requirements. In all other respects, the data will be retained for as long as is necessary in view of the further proceedings, including follow-up measures.

#### VI. Data Transmission

The data is transferred to the compliance officer of Jopp Holding GmbH for the purpose of checking the transaction for a compliance violation or to those subsidiaries that are affected by the compliance notice. The information will only be made available to those employees who absolutely need the information to process the compliance notice.

In addition, the data may also be transferred to other responsible parties (e.g. authorities) if JOPP is obliged to do so by law or by an enforceable official or court order.

#### VII. Rights of Persons who are affected

Persons who are affected have the rights to which they are entitled in accordance with Art. 15 et seq. and Art. 77 DSGVO:

The right to information about the data processed by JOPP (Art. 15 GDPR), to rectification of inaccurate data (Art. 16 GDPR), to erasure of data in certain cases (Art. 17 GDPR), to restriction of processing of data in certain cases (Art. 18 GDPR), to data portability in certain cases (Art. 20 GDPR) and the right to lodge a complaint with a supervisory authority (Art. 77 GDPR). Data subject rights can be asserted at the following e-mail address: [data\\_privacy@jopp.com](mailto:data_privacy@jopp.com).