

# Privacy Notice – Hint System

With the following information, we would like to inform you about the processing of your personal data as a whistleblower when you submit a report via SpeakUp, by e-mail, telephone call, letter or in person to Rovema.

## I. Name and address of the controller

The data controller within the meaning of the General Data Protection Regulation (hereinafter referred to as "GDPR") and other national data protection laws of the member states as well as other data protection provisions is:

Rovema GmbH  
Chief Compliance Officer  
Industriestr. 1  
35463 Fernwald  
Compliance(at)rovema.de

## II. Contact data of the (external) data protection officer

eMGe-DaTa Datenschutz mit System  
Michaela Genderka  
Blumenstraße 13, 47918 Tönisvorst  
m.genderka(at)emge-data.de  
+49 (0) 2151 94 22 060, +49 (0) 176 60 50 52 92

## III. Scope of personal data processing

We only use the following data and information voluntarily provided by you in a notice:

- Your name, if you disclose your identity,
- Your contact details, if you provide them to us for further contact,
- the fact that you have made a report via the whistleblower system,
- the fact whether you are employed by Rovema GmbH, and
- the personal circumstances described by you,
- if applicable, the names of persons and other personal data of persons named by you in the report.

## IV. Legal basis for the processing of personal data

The purpose of the hint system is to enable employees, business partners and all other parties affected by the activities of Rovema GmbH to confidentially report (possible) violations of the law or other violations.

The processing of personal data as part of the hint system is based on the legitimate interest of Rovema GmbH in the detection and prevention of wrongdoing and the associated avoidance of damage and liability risks for Rovem GmbH. The legal basis for the processing in this respect is Art. 6 para. 1 lit. f EU General Data Protection Regulation (GDPR) in conjunction with Sections 30, 130 Gesetz über Ordnungswidrigkeiten (OWiG).

If a report received concerns an employee of Rovema GmbH, the processing also serves to prevent criminal offenses or other legal violations in connection with the employment relationship. The legal basis for processing in this case is Section 26 (1) of the German Federal Data Protection Act (BDSG).

Since the submission of information can also be anonymous, we process the personal data for the identification of your person based on a consent to be given by you. The legal basis is Art. 6 para. 1 lit. a GDPR. As a rule, you can only revoke this consent within one month of providing the information, as in certain cases we are obliged under Art. 14 para. 3 lit. a GDPR to inform the accused person about the allegations made against them and the investigations carried out within one month. The obligation to inform the accused person includes the storage of the data, the type of data, the purpose of the processing, the identity of the controller and - if legally required - the identity of the reporting party, so that once the information has been provided, it is no longer possible to cease data processing or delete the identification data. The revocation period may be further shortened in certain cases, e.g., if the nature of the report requires the immediate involvement of an authority or a court. In this case, your identification data will be disclosed directly to the authority or court and stored in their procedural files.

## V. Recipients of your personal data

All information is treated confidentially and is only accessible to those employees who need to access this data to process the case.

The compliance officers dealing with the report examine the reported facts and, if necessary, carry out further case-related clarification of the facts; the data is always treated confidentially.

In certain cases, Rovema GmbH is obliged under data protection law to inform the accused person of the allegations made against them. This is required by law if it is objectively established that providing information to the accused person can no longer affect the concrete clarification of the information. As far as legally possible, your identity will not be disclosed to the reporting person, and we will also ensure that no conclusions can be drawn about your identity.

We would like to point out that in the case of knowingly false information with the aim of discrediting a person (denunciation), the confidentiality and protection of the reporting person can no longer be guaranteed.

As part of the processing of reports or an investigation, it may be necessary to provide information to other employees of Rovema GmbH or employees of its affiliated companies within the meaning of Section 15 AktG, e.g. if the information relates to transactions in Affiliates of Rovema GmbH. If necessary for the provision of information, data may be transferred to Affiliates of Rovema GmbH in a country outside the European Union or the European Economic Area, but always based on suitable or appropriate data protection guarantees for the protection of data subjects. For data transfers to third countries where there is no adequate level of data protection, it is ensured before the transfer that the recipient either has an adequate level of data protection (e.g. on the basis of an adequacy decision by the European Commission or by agreeing so-called EU standard contractual clauses of the European Union with the recipient) or that the explicit consent of the data subjects has been obtained.

We always ensure that the relevant data protection regulations are observed when passing on information.

If there is a corresponding legal obligation or data protection requirement for the disclosure of information, other possible categories of recipients include law enforcement authorities, antitrust authorities,

other administrative authorities, courts and national and international law firms and auditing firms commissioned by Rovema GmbH.

We will ensure that any person who has access to the data collected as part of a report is required to maintain confidentiality.

## VI. Retention duration

The personal data collected will be stored for as long as it is necessary to clarify and conclusively assess the reported case, for as long as the company has a legitimate interest or as required by law. This data is then deleted in accordance with the legal requirements. The duration of storage depends on the severity of the suspicion and the reported possible breach of duty.

## VII. Rights of the data subject

If your personal data is processed, you are a data subject under the GDPR and you have the following rights in relation to the data controller (see Section I. of this Policy):

- the right of access pursuant to Art. 15 GDPR,
- the right to rectification pursuant to Art. 16 GDPR,
- the right to erasure in accordance with Art. 17 GDPR,
- the right to restriction of processing pursuant to Art. 18 GDPR,
- the right to object under Art. 21 GDPR and
- the right to data portability under Art. 20 GDPR.

The restrictions under Sections 34 and 35 BDSG apply to the right to information and the right to erasure.

In addition, you have the right to lodge a complaint with the competent data protection supervisory authority (Art. 77 GDPR in conjunction with Section 19 BDSG):

Landesbeauftragte für den Datenschutz und Informationsfreiheit in Hessen  
Gustav-Stresemann-Ring 1  
65189 Wiesbaden  
Germany  
Phone: 06 11/140 80  
E-Mail: [poststelle@datenschutz.hessen.de](mailto:poststelle@datenschutz.hessen.de)

## VIII. Information on the right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on Article 6(1)(e) GDPR (data processing in the public interest) and Article 6(1)(f) GDPR (data processing based on a balancing of interests). The objection can be made informally and should preferably be sent to the contact details listed in this data protection notice under “**Contact data of the (external) data protection officer**”. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defense of legal claims. Data that is no longer required will be deleted immediately.

You can also withdraw your consent at any time. In this context, please note the information at “data Legal”.