

Transparency and information obligations for whistleblowers and other persons involved in the matter as part of the whistleblower system

With this document we shall inform you about the processing of your personal data by Wirthwein and all participating companies and the rights to which you shall be entitled under data protection law.

Responsible body / data protection

The entity responsible for data processing shall be the respective participating company (see Appendix 1) to which the report relates.

Categories / origin of data

Should you make a report via our whistleblower system, the personal data you provide shall be processed in order to process your report and, if necessary, take further action. In principle, you shall have the option of making anonymous reports. The personal data that is processed shall depend on the content of your report.

We may process your personal data in the event that you are an accused person or other person involved in the matter in order to check the report made via the whistleblower system and investigate the suspected compliance and legal violations. Which data is processed shall depend on the specific report in each individual case and also on what details a whistleblower has provided about you, for example. For example, the following data may be processed:

- Contact data (e.g. private address, mobile or landline number, e-mail address)
- Master data (surname, first name, name affixes, date of birth)
- Photos/video recordings
- Time recording data
- Specific types of personal data:
 - Health data

Purposes and legal bases of data processing

When processing your personal data, the data protection regulations (in Europe in particular the GDPR) and all other legal provisions shall always be complied with.

Should you be a reporting person, your data shall be processed on the basis of your voluntary notifications and in accordance with the statutory provisions. Should we provide the whistleblower system without being legally obliged to do so, your data shall be processed on the basis of our legitimate interest.

We shall also process your personal data as a data subject if this is necessary to protect the legitimate interests of the company or a third party. We shall have a legitimate interest in the processing of personal data for the prevention and detection of violations and grievances that are reported via the whistleblower system. In addition, your personal data shall be processed if required to meet legal obligations.

Data storage period

As soon as your data is no longer required for the above-mentioned purposes and there are no further retention obligations, it shall be deleted.

Data recipients / categories of recipients

In our company, we shall ensure that only those persons receive your data who require it to process the report submitted via the whistleblower system.

The internal registration office is run by atarax. Please find further information on the processing of your data at <https://www.atarax.de/de/datenschutz>.

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Furthermore, in certain cases, service providers (e.g. IT service providers) support us in the fulfillment of our tasks. The required data protection contracts have been concluded with all service providers.

Depending on the focus of responsibility of the report and for the effective initiation of follow-up measures, the personal data may be passed on to our relevant specialist departments.

Furthermore, in cases prescribed by law, we shall be obliged to transmit certain information to bodies such as investigating authorities.

Transfer to a third country / intention to transfer to a third country

Data shall only be transferred to third countries (outside the European Union or the European Economic Area) if this is mandatory for processing the report, is required by law or upon your consent.

Rights of the persons concerned

The following rights shall be available to you as a person concerned, whereby any local particularities must be given priority to:

- The right to information
- The right to rectification
- The right to erasure
- The right to restriction of processing
- The right to object to processing
- The right to data portability

Should you have voluntarily provided data as the reporting person, you shall be entitled to revoke your consent for any data processing at any time with effect for the future. To withdraw your consent and assert your other rights, please contact: compliance@atarax.de. The same shall apply if you have any questions about data processing in our company. You shall also be entitled to submit a complaint against data processing to a data protection supervisory authority.

Should we process your data to protect legitimate interests, you shall be entitled to object to this processing at any time for reasons arising from your particular situation.

We shall then 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.

Automated case-by-case decisions

We shall not use purely automated processing to reach a decision.

Any local particularities shall not be restricted by the above statements and shall of course be taken into account accordingly.

WIRTHWEIN

Appendix 1

Wirthwein SE	Walter-Wirthwein-Straße 2-10 97993 Creglingen, Germany	datenschutz@wirthwein.de
Wirthwein GmbH & Co. KG	Walter-Wirthwein-Straße 2-10 97993 Creglingen, Germany	
Wirthwein Brandenburg GmbH & Co. KG	Uferstraße 96 14774 Brandenburg-Kirchmöser, Germany	
Wirthwein Nauen GmbH & Co. KG	Zu den Luchbergen 64 14641 Nauen, Germany	
Winkler Design GmbH & Co. KG	Im Wasen 2 97285 Röttingen, Germany	
Wirthwein Medical GmbH & Co. KG	Bahnhofstraße 80 64367 Mühlthal/Nieder-Ramstadt, Germany	
Wirthwein Friedberg GmbH & Co. KG	Innere Industriestraße 22 86316 Friedberg-Derching, Germany	
Wirthwein Crimmitschau GmbH & Co. KG	Breitscheidstraße 75 08451 Crimmitschau, Germany	
Wirthwein Sasbach GmbH & Co. KG	Am Fuchsgraben 8 77880 Sasbach, Germany	
Wirthwein Polska Sp. z o.o.	ul. Lodowa 93E 93-232 Łódź, Poland	
Wirthwein Zaragoza S.L.	Polígono Industrial Las Norias, Calle Épila, Nave 25 A 50450 Muel, Spain	
Farel Plastik A.Ş.	ÇOSB. 7. Cad. No: 114 59500 Çerkezköy / Tekirdağ, Turkey	
Wirthwein New Bern Corp.	901 Industrial Drive New Bern, NC 28562, USA	
Wirthwein Fountain Inn, LLC	800 Woodside Avenue Fountain Inn, SC 29644, USA	
Wirthwein Fastening Systems (Kunshan) Co., Ltd.	Yuan Feng Road 158 Yushan Town, Kunshan City, Postcode 215301 Jiangsu Province, China	
Wirthwein Technical Plastics (Kunshan) Co., Ltd.	Yuan Feng Road 158 Yushan Town, Kunshan City, Postcode 215301 Jiangsu Province, China	
Shenyang Wirthwein Technology Co., Ltd.	No. 69, Kaifa Road No. 22, Economic and Technological Development Zone, Shenyang 110000, Liaoning Province China	
Xi'an Wirthwein Plastic Technology Co., Ltd.	No. 736, LingFei Road National Aviation Hi-tech Industrial Base Building 5, Aviation Advanced Manufacturing Center Phase II Yanliang District, Xi'an City Postcode 710089 Shaanxi Province, China	