

Transparency and information obligations for whistleblowers and other persons involved in the matter within the framework of the whistleblower system

under the General Data Protection Regulation (GDPR)

This document provides you with information about the processing of your personal data by the **HEINZ-GLAS Group** and all participating companies, as well as your rights under data protection law.

Responsible body/data protection

The responsible body for data processing is the respective participating company (**Appendix 1**) to which the report relates.

Contact Data protection
data-protection@heinz-glas.com

Categories/origin of data

If you submit a report via our whistleblower system, the personal data you provide will be processed in order to process your report and take further action if necessary. You always have the option of submitting anonymous reports. The personal data that is processed depends on the content of your report.

If you are an accused person or otherwise involved in the matter, we may process your personal data in order to review the report made via the whistleblower system and investigate the alleged compliance and legal violations. The data processed in this context depends on the specific report in each individual case and also on the information provided about you by the whistleblower, for example. The following data may be processed in this context:

- Contact details (e.g. private address, mobile and landline numbers, email address)
- Master data (surname, first name, name affixes, date of birth)
- Photos/video recordings
- Time recording data
- Due to free text fields in the registration form, you may voluntarily disclose special categories of personal data, e.g. health data

Purposes and legal basis of data processing

When processing your personal data, the provisions of the GDPR (in Germany additionally the BDSG) and all other legal provisions (such as BetrVG, ArbZG, etc.) are always complied with.

If you are a reporting person, your data will be processed on the basis of your voluntary information and within the framework of the legal provisions, Art. 6 (1) (a), (c) GDPR (in Germany additionally in conjunction with § 10 HinSchG, 8 LkSG) and, if you are employed by us, in accordance with Art. 88 GDPR (in Germany additionally in conjunction with § 26 (2) BDSG). If we provide the whistleblower system without being legally obliged to do so, your data will be processed on the basis of Art. 6 (1) (f) GDPR.

Furthermore, we process your personal data as a data subject if this is necessary to safeguard the legitimate interests of the company or a third party (Art. 6 (1) lit. f, lit. c GDPR (in Germany additionally in conjunction with § 10 HinSchG, § 8 LkSG or Section 130 OWiG)). We have a legitimate interest in processing personal data for the prevention and detection of violations and abuses reported via the whistleblower system. In addition, your personal data will be processed to the extent necessary to comply with legal obligations.

We also use your personal data in anonymised form for statistical purposes.

Data storage period

Your data will be deleted as soon as it is no longer required for the above-mentioned purposes and there are no further storage obligations.

Recipients of the data/categories of recipients

HEINZ-GLAS operates internationally and has locations in various countries within and outside the European Union. The stored data may only be accessed by persons within HEINZ-Glas who have been specifically authorised to do so. Insofar as this is necessary to fulfil the aforementioned purpose, specially authorised persons from our subsidiaries may also be authorised to access the data. This is particularly the case if the investigation of your report is carried out in the country concerned. All persons authorised to access the data are expressly bound to confidentiality.

The technical implementation of the Reporting Channel is carried out on our behalf by lawcode GmbH, Universitätsstraße 3, D-56070 Koblenz.

In certain cases, we are also supported by other service providers (e.g. IT service providers) in the performance of our tasks. The necessary data protection agreements have been concluded with all service providers.

Furthermore, in cases prescribed by law, we are obliged to transmit certain information to authorities such as investigative authorities.

Third country transfer/third country transfer intention

Data will only be transferred to third countries (outside the European Union or the European Economic Area) if this is necessary for processing the notification

is absolutely necessary, is required by law, or you have given us your consent to do so.

We do not (currently) transfer your personal data to any service providers or group companies outside the European Economic Area.

Rights of data subjects

Your rights as a data subject are standardised in Articles 15–22 of the GDPR. These include:

- The right to information (Article 15 of the GDPR)
- The right to rectification (Art. 16 GDPR)
- The right to erasure (Art. 17 GDPR)
- The right to restriction of processing (Art. 18 GDPR)
- The right to object to processing (Art. 21 GDPR)
- The right to data portability (Art. 20 GDPR)

If you have voluntarily provided data as a reporting person, you can revoke your consent to any data processing at any time with effect for the future. To revoke your consent and assert your other rights, please contact: compliance@heinz-glas.de . The same applies if you have any questions about data processing in our company. You can also lodge a complaint against data processing with a data protection supervisory authority.

If we process your data to protect legitimate interests, you may object to this processing at any time for reasons arising from your particular situation.

We will then no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

Technical implementation and security of your data

The Reporting Channel includes an option for anonymous communication via an encrypted connection. When using this option, your IP address and current location are not stored at any time. After submitting a report, you will receive access data for the Reporting Channel mailbox so that you can continue to communicate with us in a secure manner.

We maintain appropriate technical measures to ensure data protection and confidentiality. The data you provide is stored in a specially secured database by lawcode. All data stored in the database is encrypted by lawcode using state-of-the-art technology.

Automated individual case decisions

We do not use purely automated processing procedures to reach a decision.

Appendix 1:

HEINZ-GLAS GmbH & Co. KGaA Glashüttenplatz 1-7 96355 Kleintettau Germany	HEINZ GLAS Decor s.r.o. Soukenná 556 351 24 Hranice Czech Republic
SP Spezialglas Piesau GmbH OT Piesau Hüttenring 7 98724 Neuhaus a. Rennweg Germany	HEINZ GLAS Ibérica S.L. Francesc Layret 75, 6-3 08100 Mollet del Vallès Spain
HEINZ Veredelungs GmbH & Co. KGaA Fichtig Industrial Estate 1 96515 Sonneberg-Spechtsbrunn Germany	HEINZ GLAS UK Ltd. PO Box 106, HAYLE, TR27 9BG, UK
HEINZ GLAS France s.a.r.l. LE DYNASTEUR – 1st floor 6-8 Rue Andras Beck 92360 Meudon France	Heinz Glas do Brasil Comercio de Embalagens Ltda Rua Sao Benedito, 701 ap 31b 04735-001 Sao Paulo
Heinz Glas Italia Srl Via Marca-Relli Conrad 9 43122 Parma ITALY	HEINZ-GLAS Peru S.A.C. Av. Argentina 1239 Lima 1 Peru
HEINZ-GLAS Polska Sp. z o.o. Wł. Jagiełły 40 13-200 Działdowo Poland	HEINZ GLAS USA Inc. 360, Hurst Street Linden NJ 07036 USA
HEINZ-PLASTICS Polska Sp. z o.o. Przemysłowa 57 13-200 Działdowo Poland	HEINZ-GLAS China Co. Ltd. Office Room 402, T2, Ping An Fortune Centre Lane 1588 Shenchang Road Minhang District 201106 Shanghai China
2HD Sp. z o.o. Przemysłowa 65 13-200 Działdowo Poland	HEINZ-GLAS China Co. Ltd. 330 Donghai Road Xinbei District 213000 Changzhou, Jiangsu, China