

1. Privacy Notice pursuant to Articles 13 and 14 of the GDPR for the registration system at RVT Process Equipment GmbH:

The Company has established an Internal Reporting Office in accordance with the German Whistleblower Protection Act (HinSchG). Employees and external parties can use the whistleblower system to report potential violations of legal requirements or internal policies, thereby helping to investigate and address such violations.

By submitting a report, you contribute to the detection of misconduct and help prevent harm to the company, its employees and other stakeholders. Your information will be treated as strictly confidential in accordance with the Whistleblower Protection Act. You can submit reports of violations using the form—either anonymously or non-anonymously—by phone, or in person.

To exercise your rights or obtain further information, please contact the Internal Reporting Officer, Mr. Olaf Werner. You can contact him at RVT Process Equipment GmbH, Internal Reporting Officer, Im Gries 15, 96364 Marktrodach, Germany, under phone +49 (0) 9261 / 55235-163.

Below, we provide information about the purpose, type, and scope of data processing.

The data controller responsible for the processing of personal data is:
RVT Process Equipment GmbH, Im Gries 15, 96364 Marktrodach, Germany
Phone: +49 (0) 9261 55235 – 0, E-Mail: info@rvtpe.de, Website: www.rvtpe.com

The controller is the natural or legal person who alone or jointly with others determines the purposes and means of the processing of personal data (e.g., names, email addresses, etc.).

Our Data Protection Officer can be contacted at the above address, marked for the attention of "Data Protection Officer", or via: phone: +49 (0) 9261 55235 -755 or E-Mail: datenschutz@rvtpe.de

Categories of personal data:

We hereby inform you, in accordance with Articles 13 and 14 of the GDPR, about the processing of your personal data in connection with the whistleblower system. If you, as a whistleblower, submit a report to the internal reporting office, we will process your personal data as part of our investigative measures, to the extent that you provide such data (e.g., last name, first name, address, title, contact information, and other data). As part of our investigation, we may also process employment information about you (position, department, company, business contact information, and other details).

If you are the subject of a report (the person concerned), we process the information provided to us by the whistleblower or other individuals (e.g., last name, first name, address, title, contact information, position, employment details, and other data). We also process the information we receive in connection with further actions and during further investigations.

If you assist us as a supporting individual (party involved / witness) in connection with the investigation and review of the facts, we will also store the information we receive from you and that you provide in the relevant case file (e.g., last name, first name, address, title, contact information, position, and employment details, as well as other data).

Purpose of Processing of Personal Data

Personal data is processed for the purpose of receiving and handling reports of potential misconduct, irregularities, or legal violations within the company. This is done to fulfill legal obligations under Section 12 of the HinSchG and to carry out the duties of the internal reporting office under Section 13 of the HinSchG. This data is processed only by authorized persons in compliance with appropriate data security measures.

Legal Basis for Processing:

The processing is necessary to comply with a legal obligation to which the controller is subject (Art. 6(1), first sentence, lit. c GDPR), specifically pursuant to § 12 of the Whistleblower Protection Act (HinSchG). Consent (Art. 6(1)(a) GDPR) may also serve as a legal basis. In all other cases, the processing of personal data in the whistleblower system is based on Art. 6(1)(f) GDPR to safeguard the overriding legitimate interests of RVT Process Equipment GmbH.

In certain cases, as part of our investigative measures, we also collect special categories of personal data as defined in Article 9(1) of the GDPR. This may be the case, for example, if a report submitted by a whistleblower contains such data. Special categories of personal data include, for example, health data, data regarding trade union membership, biometric data, or data regarding political or religious beliefs. This data is processed only in accordance with data protection regulations, in particular Article 9(2)(b) and (g) of the GDPR and Section 26(3) of the BDSG.

Data Security:

All reports and any personal data contained therein are treated with the strictest confidentiality. Only pre-designated, qualified employees will process your report. All investigations are conducted in a confidential manner and on a strict need-to-know basis. In doing so, we protect your data from potential, unintentional, or unlawful manipulation, destruction, loss, alteration, unauthorized access, or unauthorized disclosure. Through necessary technical and organizational measures, we ensure that an appropriate level of protection is maintained. Our security measures are continuously improved in line with technological developments.

Storage and Retention of Personal Data:

We are legally required to retain data related to a report for three years after the conclusion of the proceedings (Section 11(5) of the HinSchG) by the internal reporting office. Longer retention is possible in accordance with § 11(5) HinSchG to meet the requirements of the HinSchG or other legal provisions, as long as this is necessary and proportionate. In cases where the proceedings are referred to an internal investigation unit or to the relevant competent authority, a decision will be made regarding any necessary longer retention period.

Disclosure of Personal Data:

Data will be transferred only for the purposes stated above. If necessary to clarify the facts of the matter or for follow-up measures, personal data may be disclosed to specific, carefully selected individuals to the extent necessary. Any person who gains access to the data is bound by a duty of confidentiality.

Your personal data will not be disclosed or otherwise transferred to third parties unless the legal requirements are met (see § 9 HinSchG).

Third parties may include:

- Other departments or individuals within the company, if this is necessary for the review or for acting, or if they need to be involved
- Legal Department
- Attorney / Law Firm
- Public authorities in connection with statutory disclosure obligations (law enforcement agencies, competent administrative authorities, courts, the Federal Financial Supervisory Authority, and the Federal Cartel Office)

Where is the data processed:

As a general rule, reports are processed exclusively in paper form. The data is not recorded electronically. The data is stored in a locked cabinet to which only the Internal Reporting Officer has access. A spare key is kept in a sealed, signed envelope with the data protection officer so that authorized access to the data can be granted in an emergency.

Rights of Data Subjects:

At this point, we would like to inform you of your rights as a subject of data.

Under applicable data protection law, you have the following rights as a data subject (rights of access and intervention) with respect to the controller regarding the processing of your personal data; please refer to the cited legal basis for the respective conditions for exercising these rights:

- Right of access pursuant to Article 15 of the GDPR
These rights may be restricted in individual cases due to the requirement to protect the identity of whistleblowers under Section 8 of the Whistleblower Protection Act (HinSchG); therefore, the identity of the whistleblower is generally excluded from this right to information. If exercising this right would jeopardize the investigation of the facts or the preservation of necessary evidence, RVT Process Equipment GmbH is permitted to comply with the request later. The obligation of confidentiality on the part of the whistleblower does not apply pursuant to Section 9 of the HinSchG if the whistleblower intentionally or through gross negligence reports incorrect information regarding violations, or pursuant to a legal obligation under Article 6(1), sentence 1, letter c of the GDPR, in the event of a request from law enforcement authorities, an order in administrative proceedings, or a court decision.
Right to rectification under Article 16 of the GDPR;
- Right to erasure (right to be forgotten) under Article 17 of the GDPR;
- Right to restriction of processing under Article 18 of the GDPR;
- Right to notification regarding rectification, erasure or restriction of processing pursuant to Article 19 of the GDPR
- Right to data portability pursuant to Article 20 of the GDPR;
- Right to object pursuant to Article 21 of the GDPR;
- Right to withdraw consent pursuant to Article 7(3) of the GDPR;
- Right to lodge a complaint with a supervisory authority pursuant to Article 77 GDPR. Contact information:
Bayerisches Landesamt für Datenschutzaufsicht (BayLDA)
Promenade 18, 91522 Ansbach, Germany
Phone: +49 (0) 981 180093-0, Fax: +49 (0) 981 180093-800
Email: poststelle@lda.bayern.de, Website: <https://www.lda.bayern.de/de/kontakt.html>
If you have any questions regarding data protection, you may also contact our Data Protection Officer.

If you have any questions regarding the use of your personal data or would like to withdraw your consent to the processing of your personal data, please contact our Data Protection Officer directly. The same applies if you wish to exercise your rights regarding your data.

2. Whistleblower Report Form:

Nr.: _____ Received on: _____ (To be completed by the reporting office representative)

The purpose of the HinSchG is to protect individuals, that is, all natural people who, in connection with their professional activities, have obtained information about violations and wish to report them. The HinSchG prohibits any form of retaliation against whistleblowers and requires companies to establish secure channels for reporting misconduct. Such misconduct may include bullying/harassment, corruption/bribery, money laundering, fraud, violations of accounting, occupational safety, or data protection regulations, or similar offenses.

3. Whistleblower:

3.1. Is this a new report, or would you like to refer to a report you have already submitted??

- ☐ I would like to submit a new report / notice
☐ I would like to expand on a report I have already submitted Nr.: _____ dated: _____
☐ I need advice from the reporting office

3.2. My relationship with the company is as follows (optional information))

- ☐ Employee ☐ Customer ☐ Supplier ☐ Other _____

3.3. Do you wish to submit your report anonymously?

- ☐ YES ☐ No, voluntary personal information

Last Name: _____ First Name: _____

Street / No.: _____ ZIP Code / City: _____

Phone: _____ E-Mail: _____

Department: _____ Other: _____

3.4. Report:

Date of the incident:	
Location of the incident:	
Participants:	
Description of the Incident:	

3.5. Are there any witnesses?

- ☐ NO ☐ YES (who?) _____

3.6. Has the incident already been reported to someone else or to an external party??

- ☐ NO ☐ YES (who/when) _____

4. Declaration of Consent to the Processing of Personal Data Pursuant to Article 6(1)(a) in Conjunction with Article 7 of the GDPR

The undersigned hereby voluntarily consents to the collection and processing by RVT Process Equipment GmbH of the personal data provided (if any):

Place, Date

Signature

4. Verification of the report (to be completed by the reporting office representative):

Step 1 Determine whether the report falls within the legal definition of § 3(8) of the HinSchG:

- ☐ YES The assessment confirms that the reporting person falls within the personal scope of the HinSchG → Continue to Step 2
- ☐ NO The report does not fall within the legal definition / scope of application → Conclusion → Response to the whistleblower

Note:

Step 2 Determine whether the report falls within the scope of application of § 2 of the HinSchG:

- ☐ YES A review shows that the report falls within the scope of application → Continue to Step 3
- ☐ NO Report does not fall within the scope of application → Conclusion → Response to the whistleblower

Note:

Step 3 Check for validity (please check the appropriate box):

- ☐ YES (min. one following applies) The report provides sufficient ☐ information to justify further investigation
The report is ☐ plausible – The information may be correct → Continue to Step 4 – Follow-up Measures
- ☐ NO The misconduct has ☐ too little substance or is ☐ implausible → Conclusion → Response to the whistleblower

Note:

Step 4: Follow-up Measures

Responsibility for Implementation: _____

Planning for implementation by: _____

Step 5: Result of the Report / conclusion:

5. Processing of the Report (to be completed by the Internal Reporting Officer) – provided the report is not submitted anonymously

- ☐ Confirmation to the whistleblower that the report has been received within seven days at the latest.

Response by: _____ per _____ through: _____ done

- ☐ No later than three months after the acknowledgment of receipt, we will provide feedback regarding any planned or implemented follow-up measures and the reasons for them.

Response by: _____ per _____ through: _____ done

- ☐ Once the process is complete, we will provide feedback on the results:

Response by: _____ per _____ through: _____ done

- ☐ No feedback was received because the data was submitted anonymously.

- ☐ The following individuals were included in the reporting process:

Mr. / Ms. _____ on: _____ because: _____

Mr. / Ms. _____ on: _____ because: _____

Report completed on: _____

Destruction of the documents relating to the: _____ Signature MSB: _____