

## **“SemperLine” information about data protection**

Semperit AG Holding has set up a whistleblowing reporting channel called SemperLine. It allows you to report malpractice using an online system or a telephone dialogue system.

### **Purpose of personal data processing**

We process personal data you provide and data concerning the individuals to whom the report relates, witnesses and other persons whose data will be disclosed, such as general information (name, language etc.) and information on the incident or misconduct in question.

We process data exclusively according to the applicable data privacy regulations for the purpose of operating a whistleblowing system and investigating reports which are submitted.

We only process personal data which is adequate, relevant and necessary for the purpose of the legitimate interests pursued by Semperit, to ensure compliance with the relevant legislation and regulations and to protect Semperit's interests. Semperit ensures you that it will not track you or process your personal data (such as IP address) when you visit the Sempeline whistleblowing system link outside of our internal network. It is safe for you to access the link or your postbox directly by bookmarking the introduction page.

### **How does the system protect your data?**

The whistleblowing system (“SemperLine”) is provided by the independent company EQS Group AG (Karlstrasse 48, 80333 München, Germany).

SemperLine is a database operated by EQS Group AG on secured and protected servers in Germany. The system is protected by means of extensive technical and organisational measures. All communication and data transfers between your computer and SemperLine are encrypted, use multiple levels of password protection and are stored at a secure location. Only the Semperit Compliance team, made up of a small number of expressly authorised people who are subject to strict confidentiality obligations, can access and process the content of the reports. Neither EQS Group AG nor other third parties have access to the data.

If you do not enter personal information about yourself that could identify you or provide details of your circumstances in the report, this whistleblower system protects your anonymity automatically. It uses a certified technical solution, which is protected using the measures mentioned above.

Semperit employees can find additional information about reporting violations and malpractice, the channels which can be used and the investigation process in the internal guidelines, which are available on the internal Compliance website.

### **Secure and confidential processing of your report and data**



The whistleblowing system ("SemperLine") enables the secure and confidential transmission, collection and processing of reports concerning compliance violations at Semperit. Only the Semperit Compliance team and you can access your report.

All reports and information are received and processed according to our standardised process and this is exclusively carried out by internal or external consultants authorised by Semperit and employees who are responsible for the further examination and investigation. They are all subject to strict confidentiality requirements. Depending on the type of the report and location, different departments may be involved to investigate and process the information contained in the report (e.g. HR, Legal, Internal Audit). The information will also be shared with the members of the management team who are responsible for risk mitigation and developing solutions. If our subsidiary is involved, local management teams will also be notified, as well as the local compliance coordinator.

### **Personal data you share**

If you decide to share your personal data, but you do not want it to be shared outside of the Semperit Compliance team or outside the EU, please indicate this in your report. This may limit the extent of processing of your report, meaning that we may not be able to continue with the investigation. In some specific cases, Semperit will still need to protect its legitimate interests or legal obligations and will proceed with the processing.

It may be a legal right for individuals to whom your report relates to be notified about the report and to have an opportunity to voice their perspective during the investigation. If you disclosed your name in your report and you do not wish your name to be shared with these individuals during our investigation, please indicate this in your report. The reported information may also be disclosed to state authorities if this is required by law.

### **Information you submit**

Only submit and provide information that is true and complete to the best of your knowledge. The information you provide can lead to decisions that will have serious consequences for the people who are involved. Knowingly providing false or misleading information can lead to criminal prosecution in some countries. Please do not provide us with information that violates your local laws, especially concerning any state secrets.

### **Access of authorities**

Certain compliance violations may initiate an external investigation conducted by authorities. By law, Semperit may be obliged to provide information to certain authorities, especially specialist investigation bodies or courts. In this case, we are obliged to forward information which you have provided.

### **Transfer of data**

As we are an international company, we may transfer your personal data to other EU countries or countries outside the EEA area for the purpose of processing your

report and for the purposes of any potential investigation. Please be aware that some countries are not deemed to have an adequate level of data protection as provided for in the EU regulations. Semperit has implemented internal protection guidelines and data protection agreements to ensure an adequate level of data protection.

## **How long does Semperit store your data?**

The personal information you provide will be processed and stored for as long as this is necessary for investigating and resolving the matter, mitigating any risks and handling any litigation. Your personal data will be processed and stored where legal, regulatory or contractual obligations to retain personal data apply or where this is permitted by law. Your personal data will be deleted as soon as this is required by law.

## **Grounds for data processing**

We process the information contained in your report based on your consent, Semperit's legitimate interests and to ensure compliance with the relevant legislation and regulations.

The Semperline whistleblowing system enables you to provide the report after you tick the data processing consent box. You consent to the processing of personal data you disclose included in the report and information you share.

During the process, you are asked to read and familiarise yourself with the security advice for using this whistleblower system and "SemperLine", as well as information about the collection, processing and use of data. After that you can still choose to remain anonymous if you wish to do so.

If you do not wish Semperit to process your personal data as described, you may submit your report anonymously. However, we do recommend including your name as many investigations can be conducted more efficiently since the person handling the report can get in touch with the whistleblower directly and can protect the whistleblower against retaliation.

## **Data controller**

Semperit Aktiengesellschaft Holding, Am Belvedere 10, A-1100 Vienna, Austria, Tel.: +43-1-79777-0, Email: [office@semperitgroup.com](mailto:office@semperitgroup.com) ("Semperit"), is the controller of the personal data. Only personnel authorised by the Semperit Compliance Department has access to the system and reports.

## **Data Protection Officer/Coordinator**

Please contact the Semperit Compliance Team ([data.privacy@semperitgroup.com](mailto:data.privacy@semperitgroup.com)) in case you have any queries or complaints regarding the processing of personal data in relation to Semperline. Your rights under the EU GDPR can be viewed in the Semperit [Data Privacy Statement](#). You also have the right to lodge a complaint with the Austrian Data Protection Authority, Barichgasse 40-42, A-1030 Vienna, Austria.