

Data protection information

RWE ensures compliance with the applicable legislation through a business model-oriented compliance organisation, legally compliant processes and measures for prevention and response. Allegations of misconduct causing harm to the company or violations of laws, regulations or internal RWE rules as well as other risks or grievances affecting RWE that become known in the course of your work or in any other connection with RWE can be reported securely to the responsible departments at RWE either with your name or anonymously. Such report may include information on suspected risks or violations of the following: RWE Code of Conduct, white-collar criminal offences (e.g. fraud, embezzlement, corruption), money laundering and terrorist financing, competition or antitrust law, data protection, information security, occupational safety or other security-related issues, discrimination and harassment in a professional context, tax law, other criminal or unlawful conduct and acts damaging to the company, human rights and environmental risks as well as irregularities falling within the scope of the Swedish Whistleblowing Act (2021:890).

The protection of personal data is important to us and we take all necessary measures for you to feel safe when submitting a report. With this in mind, we are informing you about the associated processing of your personal data in accordance with the EU General Data Protection Regulation (GDPR).

This data protection information applies only when submitting reports to the local whistleblowing channel of RWE in Sweden. There is a separate data protection information for RWE's central whistleblowing channel.

1. Controller

RWE Renewables Sweden AB (reg. no. 556938-6864) is the controller and responsible for processing your personal data. Contact details of the controller is provided in section 2.

2. Data Protection Officer

You can reach our Data Protection Officer at

RWE Renewables Sweden AB
Data Protection Officer
Box 388
201 23 Malmö
Sweden

You can also send an email to dpo-north-europe@rwe.com.

3. Personal data that we process and sources of the data

Depending on the individual circumstances, the following data categories may apply:

- contact details (e.g. name, telephone, e-mail, address)
- employment data, and
- where applicable, names and contact details of individuals and other personal data (including special categories, where legal basis exists) of the individuals that the report concerns.

We generally receive the personal data processed for the purposes outlined below from the whistleblowers themselves or is collected in the process of handling the report. When handling the report, we may also use personal data that we already have or collect it from publicly available sources.

Status: January 2024

4. Purposes and legal basis for processing your data

In particular, we process your personal data for the following purposes:

- **Uncovering misconduct:** Information can be used to uncover misconduct, in particular (internal/external) actions/omissions that are detrimental to the company, possible breaches of (labour) contractual obligations or criminal offences/regulatory violations as well as other irregularities, within the company.
- **Uncovering conflicts of interest:** Information also serves to uncover possible conflicts of interest that could lead to the violation of laws or other breaches of regulations.
- **Prevention of misconduct:** Furthermore, information can typically also prevent or at least impede future (internal/external) acts/omissions that are detrimental to the company, breaches of (employment) contracts or criminal offences.
- **Assertion, exercise or defence of legal claims:** Information may also be processed for assertion, exercise or defence of legal claims. For example, RWE may take measures to initiate (labour) court proceedings or other legal disputes on the basis of information provided.
- **Exoneration of employees:** RWE also takes appropriate measures to uncover possible allegations against employees of RWE who have been wrongly suspected and to exonerate them.
- **Compliance with legal obligations:** RWE is subject to comprehensive statutory supervisory and compliance obligations including but not limited to Swedish Whistleblowing Act, due diligence and sanctions screening, occupational safety and health as well as data protection regulations.

Processing of personal data by RWE within of the whistleblower framework relies on the following legal bases:

- **Implementation of the employment relationship:** Data processing within the whistleblower framework may be necessary, among other things, for the establishment, implementation and termination of the employment relationship with any employee concerned. Measures to uncover breaches of duty under the employment contract that do not constitute a criminal offence may also be justified. Measures may also be necessary for the settlement of employment relationships, for example in the context of labour court disputes with the respective employee.
- **Investigation of criminal offences:** If information serves to uncover possible criminal offences in the context of employment relationships, the corresponding data processing will only take place if documented factual indications justify the suspicion of a criminal offence in the employment relationship and the interests of the employee concerned do not prevail.
- **Implementation of legal obligations (Art. 6 para. 1 lit. c GDPR):** RWE is subject to comprehensive statutory supervisory and compliance obligations. The measures taken by RWE on the basis of information also serve, among other things, to implement these legal obligations of RWE. In particular, individuals responsible for processing reports at RWE are

authorised to process personal data, including special categories, insofar as this is necessary to fulfil the obligations arising from statutory provisions.

- **Consent (Art. 6 para. 1 lit. a):** Processing of data within the whistleblower framework is voluntary and can rely on your freely given consent.
- **Safeguarding legitimate interests (Art. 6 para. 1 lit. f GDPR):** RWE may also process data in order to pursue its legitimate interests or those of a third party. RWE will ensure that processing of your data will only take place if interests and rights of the data subjects do not outweigh the pursued legitimate interests. These legitimate interests may include:
 - **Legal defence:** Prevention of damage to our own company. In this respect, data processing also serves the legitimate interests of RWE in the form of the assertion, defence and exercise of legal claims.
 - **Improving compliance structures:** Information can also be used to improve RWE's internal compliance structures. For example, RWE can uncover and rectify potential weaknesses in its internal compliance organisation on the basis of information provided.
 - **Support for persons named in reports:** Information can also be used to exonerate persons named in a report. This is generally a legitimate interest of a third party.
 - **Implementation of foreign legislation:** In addition to national and EU legal requirements, RWE is also subject to comprehensive legal provisions of countries outside the EU. The implementation of such foreign legislation is also generally recognised as a legitimate interest.

5. Disclosure of data and transfer to a third-country

The report is checked upon receipt and follow-up measures are determined. Depending on the content of the report, the departments responsible for further processing at RWE will receive the reported information.

Otherwise, the data contained in the report may not be passed on. All statutory confidentiality requirements and exceptions thereof will be complied with. If the consent of the data subject is required for the disclosure of data, we will obtain this in advance. Nevertheless, we would like to point out that we may be obliged to disclose the identity of data subjects due to legal provisions or by official mandatory order (e.g. by court).

Where service providers are commissioned, they are carefully selected and monitored and are obliged to maintain confidentiality and comply with legal requirements.

The abovementioned can entail transfer of personal data to a third-country (i.e. outside EU/EEA). You can obtain an overview of the recipients in third-countries, information on existence of adequacy decisions and a copy of the safeguards to ensure an adequate level of data protection from us. Please use the contact details provided under section 2 to request additional details.

6. Data storage period

RWE will store personal data collected as part of the whistleblower framework and subsequent measures in accordance with the applicable data protection provisions. As a general rule, RWE will delete the personal data two years after the case has been closed.

Status: January 2024

7. Security measures

Submitted reports are handled exclusively by a narrow circle of authorised and specially trained RWE employees. The employees entrusted with the processing of reports and the service providers commissioned by us in this context are obliged to maintain confidentiality, secrecy and compliance with the applicable legal provisions, in particular data protection regulations, provisions for the protection of whistleblowers under the Swedish Whistleblowing Act.

We take all necessary technical and organisational measures to ensure an appropriate level of protection and to secure your data processed by us, in particular against the risks of accidental or unlawful destruction, manipulation, loss, alteration, unauthorised access or disclosure. Our security measures are regularly improved in line with technological developments.

8. Your data protection rights

You can assert the following rights under the respective legal conditions (Chapter III of GDPR):

- right of access to obtain information on data processing and a copy of the data processed,
- right to rectification to have incorrect data corrected,
- right to request restriction of processing,
- right to erasure to have your data erased if there is no legal reason for further retention,
- right to data portability with regard to personal data that you have provided,
- right to withdraw your consent at any time where processing is based on consent, and
- the right to object to data processing on the grounds of legitimate interest, if this can be justified on the basis of your particular situation.

If you have given us separate consent to process your personal data, you can withdraw this consent at any time. The legality of the processing of your data up to the time of revocation remains unaffected by a revocation.

If you wish to exercise any of these rights, please contact us via the contact details provided under section 2. Without prejudice to any other remedy, you shall have the right to lodge a complaint with a supervisory authority, [Swedish Authority for Privacy Protection](#).

9. Automated decision-making including profiling

Automated decision-making, including profiling, does not take place within the whistleblower framework.

10. Obligation to provide your personal data

The provision of personal data by whistleblowers is not mandatory. RWE is subject to legal obligations to follow up on such information.