

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

in accordance with the General Data Protection Regulation (GDPR)

With this document we inform you about the processing of your personal data by **Flex Elektrowerkzeuge GmbH** and all participating companies and the rights to which you are entitled under data protection law.

Responsible body/data protection

The entity responsible for data processing is the participating company to which the notification relates.

FLEX Elektrowerkzeuge GmbH, Bahnhofstr. 15, 71711 Steinheim an der Murr

FLEX Geschäftsführungs GmbH, Bahnhofstr. 15, 71711 Steinheim an der Murr

FLEX Verwaltungs GmbH & Co. KG, Bahnhofstr. 15, 71711 Steinheim an der Murr

EGO Europe GmbH, Autenbachstr. 11, 71711 Steinheim an der Murr

FLEX Power Tools BVBA, Toekomstlaan (HRT) 4 Box 3 16/08/2011, 2200 Herentals, Belgium

FLEX Power tools B.V., Sigarenmaker 3 A, 5521 DJ Eersel, Netherlands

FLEX Elektronářadí s.r.o., Vita Nejedleho 919, 29501 Minichovo Hradiste, Czech Republic

FLEX Italia S.r.l., Via F. Ili Cervi Snc, 20090 Segrate, Italy

FLEX Electroportatif Machines et Accessoires-FEMA, Eco-Parc de Bonvert 19, Rue Barthelemy Thimon-nier, 42300 Mably, France

FLEX POWER TOOLS LIMITED, Unit 8 Anglo Office Park, Lincoln Road, High Wycombe, Buckinghamshire HP12 3RH, England

SKIL B.V., Curiewegg 5, 8013RA, Zwolle, Belgium

Chervon GmbH, Bahnhofstr. 15, 71711 Steinheim an der Murr

Chervon Europe Ltd, 4th Floor, The Anchorage, 34 Bridge Street, Reading, RG1 2LU, England

Contact for data protection:

datenschutz@flex-tools.com

Categories/origin of the data

If you make a report via our whistleblower system, the personal data you provide will be processed to process your report and, if necessary, take further action. In principle, you have the option of making anonymous reports. Which personal data is processed accordingly depends on the content of your report.

We may process your personal data if you are an accused person or other person involved in the facts of the case in order to process the information provided via the whistleblower system.

and to investigate the suspected compliance and legal violations. Which data is processed depends on the specific report in each individual case and also on what information, for example, a whistleblower has provided about you. For example, the following data may be processed:

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

Purposes and legal basis of data processing

When processing your personal data, the provisions of the GDPR (in Germany additionally to 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 statutory provisions, Art. 6 para. 1 sentence 1 lit. a, lit. c GDPR (in Germany additionally in conjunction with § 10 HinSchG) and, if you are employed by us, in accordance with Art. 88 GDPR (in Germany additionally in conjunction with § 26 para. 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 para. 1 sentence 1 lit. f GDPR.

Otherwise, 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 para. 1 lit. f, lit. c GDPR (in Germany additionally in conjunction with § 10 HinSchG or § 130 OWiG)). We have a legitimate interest in the processing of personal data for the prevention and detection of violations and abuses that are reported via the whistleblower system. In addition, your personal data is processed insofar as this is necessary to fulfill legal obligations.

Storage period of the data

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

Recipients of the data/categories of recipients

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

The internal reporting office is taken over by Atarax. Further information on the processing of your data can be found at <https://www.atarax.de/de/datenschutz>.

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

Depending on the focus of responsibility of the report and 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 are obliged to transmit certain information to authorities, such as Investigating authorities.

Transfer to third countries/intention to transfer to third countries

Data will only be transferred to third countries (outside the European Union or the European Economic Area) if this is absolutely necessary for processing the report, is required by law or if 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 the data subjects

The rights for you as a data subject are standardized in Art. 15 - 22 GDPR.

This includes:

- The right of access (Art. 15 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 the reporting person, you can 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 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 can 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 which override your interests, rights and freedoms or the processing serves the establishment, exercise, or defense of legal claims.

Automated decisions in individual cases

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