

# Data Protection Information

Data protection information for the BSH whistleblowing system Trust and Tell (BKMS® Incident Reporting System)

## Section 1: Introduction and general information

### About us and the trust and tell website

This reporting system is operated by a specialised external service provider, Business Keeper AG, Bayreuther Str. 35, 10789 Berlin in Germany, on behalf and in the name of: BSH Hausgeräte GmbH, Carl-Wery-Strasse 34, 81739 Munich.

BSH Hausgeräte GmbH further acts as provider of the reporting System for its subsidiaries (together referred to as "BSH") using the reporting system.

### About the processes in connection with our trust and tell service

Personal data and information entered into the reporting system are stored in a database operated by Business Keeper AG in a high-security data centre, acting as processor for BSH. Only BSH has access to the data. Business Keeper AG and other third parties do not have access to the data. This is ensured in the certified procedure through extensive technical and organisational measures. All data are stored encrypted with multiple levels of password protection so that access is restricted to a very small selection of expressly authorised persons at BSH.

The reporting system serves the purpose of securely and confidentially receiving, processing and managing reports regarding compliance violations within/related to BSH.

## Our guiding principles

We take protecting your information very seriously. Your data is therefore processed with great care and in strict compliance with applicable data protection law. Organisational and technical security measures have been taken to protect all of our websites against the risks present in processing personal data. Our partners who support us in the provision of this website must comply with these provisions as well.

## Which permissions do we have to process your data

We respect your privacy. Consequently, we only process your data when we are permitted to do so. You will find a summary of the relevant statutory authorisations, on which we base the data processing, at the end of this information. We are also permitted to process your data when we have a legitimate interest in doing so. One example of this is the log data that we collect in order to ensure that e.g. our website can be operated without defects (including the technical provision of the website). In any case, we will inform you about the corresponding processing of your personal data and, of course, your interests will always be taken into account in any such processing. In case that you have questions to your personal data, you can find your rights regarding the processing of your personal data in the latter section of this Data Protection Information.

The permissions we make use of, and when, are outlined in the following section. You can find more detailed information on how your data is collected, processed and used on our website (i.e. the type, scope and purpose of data processing) in the same section.

## Section 2: Data processing on the website

### How we process your data

Incoming reports are received by a small selection of expressly authorised and specially trained employees of the central Compliance department of BSH in Munich, Germany. Reports are always handled confidentially.

These employees will evaluate the reported issues in terms of subject matter and corresponding responsibilities and might forward the report for further evaluation or investigation to dedicated units/departments within BSH. Depending on the reported topic, this can be the investigations unit of the Compliance Organization or dedicated contacts within the Human Resources Department or within other specified units (e.g., product safety, social responsibility, tax/accounting).

During the processing of a report, it may become necessary to share reports with additional employees of BSH or employees of other group companies, e.g. if the reports refer to incidents in subsidiaries. The latter may be based in countries outside the European Union or the European Economic Area with different regulations concerning the protection of personal data. We always

ensure that the applicable data protection regulations are complied with when sharing reports. All persons who receive access to the data are obligated to maintain confidentiality.

### IP address, Cookies etc.

The reporting system does not log IP address data, time stamps or metadata relating to its use by whistleblowers.

During use of the BKMS® Incident Reporting, the server is not capable of uniquely identifying the client (the user's computer). In order to be able to clearly identify the client during a session, the application transmits a session cookie to the user's Computer. This session cookie is only used for the current connection and only has an Identification number for the session in progress. This cookie is deleted once the browser is closed. This session number bears no relation to the whistleblower or the data being submitted and is only necessary for technical reasons.

### Using our website

Use of the reporting system takes place on a voluntary basis. If you submit a report via the whistleblowing system, we collect the following personal data and information:

- your name, if you choose to reveal your identity,
- other personal data from you, that you might share voluntarily (e.g., contact data, the BSH company and or department you are employed at, your role in the company),
- the names of persons and other personal data of persons that you name in your report.

It is possible to set up a postbox within the reporting system that is secured with an individually chosen pseudonym / user name and password. This allows you to send reports to the responsible employee at BSH either by name or in an anonymous, safe way. This system only stores data inside the reporting system, which makes it particularly secure. It is not a form of regular e-mail communication.

When submitting a report or an addition, you can simultaneously send attachments to the responsible employee of BSH. If you wish to submit an anonymous report, please take note of the following security advice: Files can contain hidden personal data that could compromise your anonymity. Remove this data before sending. If you are unable to remove this data or are unsure how to do so, copy the text of your attachment into your report text.

### Your point of contact for all questions relating to data protection

If you have any questions relating to data protection or exercising your rights, you can use the following contact information to get in touch with our data protection officer directly:

BSH Hausgeräte GmbH

Data Protection Officer  
Carl-Wery-Str. 34  
81739 Munich, Germany

[Data-Protection@bshg.com](mailto:Data-Protection@bshg.com)

## Changes to this Data Protection Information

This Data Protection Information reflects the current state of data processing on our website. In the event of changes to data processing, this Data Protection Information will be updated accordingly. We always provide the latest version of this Data Protection Information on our website so that you can find out about the scope of data processing on our website.

### Section 3: Supplementary information

**Supplementary information according to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data, on the free movement of such data and repealing Directive 95/46/EC (GDPR)**

## Legal basis for data processing

We base the above data processing operations on

- a legal permit in accordance with Art. 6 para. 1 lit. f of Regulation (EU) 2016/679: The processing of personal data in the BKMS® System is based on the legitimate interests of our company to detect and prevent misconduct and thus avoid damage to BSH, its employees and customers.
- Art. 6 para. 1 lit. c of Regulation (EU) 2016/679: In Europe, the implementation of a whistleblowing management system is a legal obligation arising from the European Whistleblowing Directive (Regulation (EU) 2019/1937) and derived national transposition laws on whistleblower protection. The Directive allows the processing of personal data, which is necessary for handling of a report in accordance with the legislation.

## User rights

If you have any questions about your personal data, you will find a description of your rights below:

### Exercise of your data protection rights

Please use the following contact channels for your requests: Data-Protection@bshg.com

- Your right to information about your data: We will provide you with information about the data we hold about you on request.
- Your right to correct and complete your data: We will correct inaccurate information about you if you notify us accordingly. We will complete incomplete data if you notify us accordingly, provided this data is necessary for the intended purpose of processing your data.

- Your right to delete your data: We will delete the information we hold about you on request. However, some data will only be deleted subject to a defined period of retention, for example because we are required to retain the data by law in some cases, or because we require the data to fulfil our contractual obligations to you.
- Your right to have your data blocked: In certain legally determined cases, we will block your data if you would like us to do so. Blocked data is only further processed to a very limited extent.
- Your right to withdraw consent: You can withdraw consent given for your data to be processed with effect for the future at any time. The legality of processing your data remains unaffected by this up to the point at which your consent is withdrawn.
- Your right to object to the processing of your data: You can object to the processing of your data with effect for the future at any time, if we are processing your data on the basis of one of the legal justifications set out in article 6(1e or 1f) of Regulation (EU) 2016/679. In the event that you object we will cease processing your data, provided that there are no compelling and legitimate grounds for further processing. The processing of your data for the purposes of direct marketing never constitutes compelling and legitimate grounds for us.
- Your right to data portability: At your request, we can make certain information available to you in a structured, commonly used and machine-readable format.
- Your right to appeal to a regulatory authority: You can lodge an appeal pertaining to data protection with a data protection authority. To do so, contact the data protection authority responsible for your place of residence or the data protection authority under whose jurisdiction we fall (named below).

Bavarian Data Protection Authority (BayLDA), [www.baylda.de](http://www.baylda.de).

#### Section 4: Country specifics

Italy	<p>In addition to section 2: <i>Data processing on the website / How we process your data</i> the following applies:</p> <p>If the report relates to an offence under Legislative Decree No. 231/2001, the information on the report must also be communicated to the Supervisory Board appointed by the company.</p>
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