

Privacy policy on the processing and investigation of compliance breach notifications received

For NORMA Group SE ("**NORMA Group**" or "**we**"), compliance with the law and internal guidelines is an indispensable basis for your business activities. NORMA Group meets this requirement, among other things, through an appropriate compliance organization, suitable processes and measures to prevent and respond to possible breaches of rules. These measures also include the introduction and operation of a whistleblower system by NORMA Group. NORMA Group employees ("**Employees**") and external parties can use this whistleblower system to inform NORMA Group about possible violations of legal requirements or internal regulations ("**Breaches of Rules**") ("**Notification**") and thus contribute to their clarification and prosecution.

Pursuant to Articles 13, 14 of the EU General Data Protection Regulation (GDPR), we hereby inform you about the processing of personal data ("**Data**") in the context of the processing and investigation of received notifications of compliance violations. NORMA Group will process personal data submitted in the course of the whistleblowing exclusively in accordance with the applicable data protection requirements. These requirements result in particular from the GDPR, the German Federal Data Protection Act (Bundesdatenschutzgesetz, GFDPA) and other applicable laws. This data protection information contains further explanations on data processing that serve to record, investigate and clarify the information received. It supplements the general data protection information for the employment relationship.

1. Who is responsible for processing your data?

The responsible party for the processing of your data within the meaning of Art. 4 No. 7 GDPR is the

NORMA Group SE

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63477 Maintal
Germany
dataprotection@normagroup.com

You can reach our **data protection officer** at the above address or at dataprotection@normagroup.com.

NORMA Group SE and its affiliated group companies pursuant to Section 15 et seq. German Stock Corporation Act, NORMA Group's affiliated group companies also process some personal data as joint controllers within the meaning of Art. 26 GDPR within the scope of the whistleblower system.

Depending on the type and scope of the measures required, NORMA Group may entrust service providers with the specific implementation of the corresponding investigation and clarification measures. These service providers may include, for example, auditors, law firms or tax advisors. In this case, the service providers often act as their own data protection officers within the meaning of Article 4 No. 7 of the GDPR.

2. Background of the processing of your data

NORMA Group is obliged to ensure compliance with applicable laws in its business operations. This includes, for example, the requirements of criminal law, regulatory offences law, tax law, data protection law, stock corporation law, labour law, antitrust law and other binding legal requirements.

If NORMA Group does not adequately comply with these legal requirements, the consequences may include fines, imprisonment, penalties, claims for damages or reputational damage. In order to comply with its legal obligations, NORMA Group therefore takes appropriate measures to ensure compliance with legal requirements and internal regulations within the company. These measures also include the introduction and operation of a whistleblower system.

According to NORMA Group's Code of Conduct, all employees of NORMA Group are required to report possible violations of the law or serious breaches of rules. Employees as well as external parties who make such a report ("whistleblowers") have various channels at their disposal for this purpose. With its established Compliance Management System, NORMA Group has taken appropriate measures to be able to follow up incoming information promptly and effectively. When clarification/investigation measures are to be carried out, it is ensured that the legitimate interests of the persons affected by the information or named in the information ("affected persons") are protected.

More detailed information on the various channels for submitting tips and on the whistleblower procedure is summarized in the Whistleblower Protection Policy, which is available on the intranet and on the internet: <https://www.normagroup.com/corp/en/compliance/>.

The whistleblower system is technically operated by Business Keeper GmbH (www.business-keeper.com) - which has no way of taking note of personal data. The personal data is stored in a database operated by Business Keeper GmbH in a high-security data center. Business Keeper GmbH and other third parties have no access to the data. This is guaranteed in the certified process by comprehensive technical and organizational measures. All data is encrypted and stored with multi-level password protection so that access is restricted to a very narrow circle of recipients of expressly authorized persons at NORMA SE.

3. For what purposes do we process your data?

NORMA Group processes your data in compliance with the applicable laws, in particular for the following investigative and educational purposes:

- **Checking the plausibility of notifications:** Before initiating any clarification measures, NORMA Group will, in particular, check whether the information submitted appears plausible and indicates a reportable breach of rules. The processing of the data serves, among other things, this plausibility check.
- **Clarification of misconduct:** Clarification measures can serve to uncover and clarify possible breaches of duty under employment contracts or criminal acts committed by NORMA Group employees in the performance of their official duties as well as other breaches of rules and malpractices within the company. This concerns, for example, the detection and punishment of acts of fraud, corruption, tax offences, antitrust violations, money laundering or other economic offences or violations of the NORMA Group Code of Conduct.
- **Implementation of legal obligations:** NORMA Group is subject to comprehensive statutory supervisory and compliance obligations. These result, among other things, from Sections 130, 30 of the German Administrative Offences Act (OWiG) and Sections 93, 111 of the German Stock

Corporation Act (AktG). Clarification measures serve to implement these and other legal obligations of NORMA Group.

- **Prevention of future misconduct:** Furthermore, the results of the investigation and clarification measures - insofar as they are suitable for this purpose - are also incorporated into general, preventive compliance measures (e.g. training) and thus help to prevent or make it more difficult for NORMA Group employees to violate laws or regulations in the future.
- **Exercise of rights:** Investigation and clarification measures may also serve to compensate for and avert imminent economic or other damages or disadvantages for NORMA Group and thus serve the effective legal defense as well as the exercise and enforcement of rights. For example, NORMA Group will use the results and information obtained through investigation and clarification measures, if necessary, in the context of labor court proceedings or other legal disputes.
- **Relief of employees:** NORMA Group also takes appropriate investigative and clarification measures in coordination with the respective person affected in order to clarify possible allegations against persons affected who have been wrongly suspected and to exonerate them (so-called rehabilitation).
- **Checking the relevance for other Group companies:** NORMA Group may forward information from whistleblowers, which may also concern another Group company, to the latter within the framework of the existing legal regulations. The processing of data also serves, among other things, to check whether a corresponding data transfer is necessary in the individual case or whether this must be carried out on a personal basis.
- **Implementation of duties to cooperate:** NORMA Group may be required by law to provide law enforcement or other authorities with data collected in the course of investigations and clarifications. This may be the case, for example, if a law enforcement agency initiates a criminal investigation against a data subject as a result of a clarification measure.

In addition, the purposes stated in the general data protection information for the employment relationship may be considered as possible purposes of data processing.

4. Which data or data categories are affected by investigation and clarification measures?

In the course of investigative and educational measures, we may process the following data or categories of data:

- **Data relating to notifications:** As part of the whistleblower procedure, NORMA Group records, among other things, the time, content and other relevant circumstances relating to the information provided by whistleblowers as well as the process and results of any investigation and clarification measures. For example, it is recorded whether the whistleblower submitted the notification via an internal or an external reporting channel. If a whistleblower discloses his or her identity as part of the whistleblowing process, this is also recorded.
- **Corporate information:** NORMA Group may also process operational information about you (e.g. function in the company, job title, possible supervisor position, professional e-mail address, professional telephone number) as part of investigative and intelligence activities.

- **Information on relevant facts:** Typical investigation and clarification measures often relate to specific facts. The determination and evaluation of relevant information on the respective facts can, if necessary, allow conclusions to be drawn about your conduct or actions you have carried out. In individual cases, this may also include breaches of duty or criminal offenses.
- **Operational information:** NORMA Group may also evaluate operationally related information, documents and communication data as part of investigative and intelligence activities. Such information may also include personal data.
- **Personal information:** NORMA Group may process general personal information about you (e.g. name, home address, private telephone number, private email address) in the course of investigative and intelligence activities.
- **Private content:** In individual cases, data records to be analyzed may also allow conclusions to be drawn about private content relating to you. This may be the case, for example, if a notification transmitted by a whistleblower contains corresponding content. NORMA Group will, however, take appropriate technical and organizational measures to ensure that data records with purely private content are not evaluated.
- **Data on criminal convictions and offences:** In the context of investigative and intelligence measures, NORMA Group may also need to collect data about you that allows conclusions to be drawn about criminal offences or criminal convictions. However, NORMA Group will only process this data in accordance with the relevant data protection requirements, in particular Art. 10 GDPR.
- **Special Categories of Personal Data:** In individual cases, NORMA Group also collects and processes special categories of personal data within the meaning of Article 9 (1) of the GDPR as part of investigation and clarification measures. This may be the case, for example, if a tip transmitted by a whistleblower contains corresponding data. Special categories of personal data include, for example, health data, data on possible trade union membership, biometric data or data on political or religious attitudes. NORMA Group will only process such data in accordance with the relevant data protection requirements, in particular Article 9 (2) GDPR or Section 26 (3) GFDPA

5. On what legal basis is the processing of your data based?

NORMA Group will only process your data in the context of investigative and intelligence measures to the extent permitted by at least one applicable data protection regulation. This includes in particular the provisions of the GDPR, the BDSG and other applicable laws. NORMA Group may base permissible data processing in the context of investigation and reconnaissance measures in particular on the following legal bases:

- **Establishment, performance or termination of the employment relationship (Section 26 (1) Sentence 1 GFDPA):** Data processing in the context of investigation and clarification measures may be necessary, among other things, for the establishment, performance or termination of the employment relationship with employees. This applies, for example, to investigation and clarification measures to uncover breaches of duty under the employment contract that do not constitute a criminal offense. Investigation and clarification measures may also be necessary for the settlement of employment relationships. This may be the case, for example, if NORMA Group imposes labor law sanctions against a person concerned on the basis of the findings obtained in the course of an investigation and clarification measure.

- **Investigation of criminal offences (Section 26 (1) Sentence 2 GFDPA):** If investigation and investigation measures serve to uncover possible criminal offences in the context of employment relationships, these may be justified pursuant to Section 26 (1) Sentence 2 GFDPA. However, NORMA Group will only base the corresponding data processing on Section 26 (1) Sentence 2 GFDPA if documented factual indications substantiate the suspicion of a criminal act in the employment relationship and the interests of the data subject do not prevail.
- **Implementation of legal obligations (Art. 6 para. 1 lit. c GDPR):** As already outlined in sections 2 and 3 of this data protection information, NORMA Group is subject to comprehensive statutory supervisory and compliance obligations. The investigation and clarification measures carried out by NORMA Group thus also serve, among other things, the implementation of these legal obligations of NORMA Group
- **Company agreements (Art. 88 para. 1 DSGVO, Section 26 para. 4 GFDPA):** NORMA Group may also process your data on the basis of an applicable company agreement that regulates the implementation and operation of the whistleblower system.
- **Safeguarding legitimate interests (Art. 6 para. 1 lit. f GDPR):** NORMA Group may also process your data to protect its legitimate interests or the legitimate interests of a third party. These legitimate interests may include in individual cases:
 - Legal defense: NORMA Group also carries out investigative and clarifying measures, among other things, in order to avert damage to its own company. In this respect, the data processing may also serve the legitimate interests of NORMA Group in the form of asserting, defending and exercising legal claims.
 - Improvement of compliance structures: Investigation and clarification measures may also indirectly serve to improve NORMA Group's internal compliance structures. For example, in the course of investigation and clarification measures, NORMA Group may uncover and remedy possible weaknesses in the internal compliance organization. This is also a legitimate interest of NORMA Group.
 - Support of affected parties: Investigation and clarification measures can, among other things, also serve to relieve those affected. This is generally a legitimate interest of a third party.
 - Implementation of foreign legal provisions: In addition to national and EU legal requirements, NORMA Group is also subject to comprehensive legal provisions of countries outside the EU in the area of compliance. These include, for example, anti-corruption or competition guidelines under US law. Ensuring compliance with such foreign legal provisions may also constitute a legitimate interest.
 - NORMA Group will ensure that investigation and clarification measures are only carried out to protect legitimate interests insofar as conflicting legitimate interests and rights of the employees affected by this do not prevail.
 - NORMA Group will only disclose your data to third parties in the context of investigation and educational measures if there is a legal basis for doing so or if your consent to the relevant data transfer has been obtained in advance.
 - In the case of data transfers in the context of investigation and educational measures, the following recipients of data in particular come into consideration:

- Works Councils and other Representations of Interests: NORMA Group may also disclose your data to the works council and/or other employee representative bodies in accordance with the applicable provisions of the Works Constitution and data protection laws. This may be the case, for example, if the prior consent of the works council is required for specific investigation and clarification measures.
- Other Group companies: In order to clarify possible compliance issues, we may also need to transfer your data to other group companies of NORMA Group. Such intra-group data transfers may occur in particular if investigation and clarification measures are based on facts that concern several or other group companies.
- Courts, authorities and other public bodies: NORMA Group may also disclose the results of investigations and clarifications to public authorities. This concerns, for example, German or foreign public prosecutors, courts or other authorities. Such disclosure may be necessary in particular if NORMA Group is legally obliged to disclose the relevant data. This may be the case, for example, in the context of criminal investigations that are initiated as a result of investigation and clarification measures.
- Service providers: When carrying out investigation and clarification measures, NORMA Group may also rely on the support of external service providers, such as law firms or auditing companies. Appropriate measures are taken to ensure that these service providers only process your data in accordance with the relevant data protection requirements.
- Processors bound by instructions: NORMA Group may also involve processors within the meaning of Article 28 of the GDPR in the context of investigation and clarification measures, e.g. in the context of document management. NORMA Group will ensure that these processors only process data for NORMA Group on the basis of an effective order processing agreement.
- Other third parties: If this is necessary to carry out the purposes stated in this data protection information and no conflicting interests of data subjects worthy of protection prevail, a transfer of your personal data to opposing parties or to insurance companies may also be considered.

The general data protection information for the employment relationship contains a more detailed list of possible recipients of personal data as well as information on the relevant legal basis.

If we have not collected your personal data processed for compliance purposes directly from you, we typically receive it from the entities, business partners or similar sources mentioned above in this section of the privacy information.

6. What data protection rights you have?

As a person affected by the data processing, you can assert various data subject rights. In order to make use of your rights, you can contact NORMA Group via the contact details mentioned in section 1. The data subject rights include in particular:

Right to information (Art. 15 GDPR); Right to rectification (Art. 16 GDPR); Right to erasure (Art. 17 GDPR); Right to restriction of processing (Art. 18 GDPR); Right to lodge a complaint with a data protection supervisory authority.

The general data protection information for the employment relationship explains the prerequisites and scope of the individual data subject rights in more detail under Section 8.

If we process your personal data on the basis of your consent, you have the right to revoke this consent at any time without giving reasons with effect for the future.

If you believe that your data protection rights have been violated by us, you have the right to complain to the supervisory authority responsible for us. The competent supervisory authority is the Hessian Commissioner for Data Protection and Freedom of Information. Postal address: P.O. Box 3163 in 65021 Wiesbaden. E-mail: poststelle@datenschutz-hessen.de.

7. How long do we store your data?

NORMA Group will store or delete the data collected in the course of the investigation and clarification of information in accordance with the relevant provisions of data protection law, in particular in accordance with Art. 17 GDPR. Accordingly, NORMA Group will generally delete your data when it is no longer required for the purposes stated in this data protection information.

However, legal retention requirements or legitimate interests of NORMA Group may justify a longer retention of your data. For example, NORMA Group may continue to store your data during current legal disputes, which are the result of possible investigation and clarification measures.

The retention periods depend on the retention interest of NORMA Group in each individual case, taking into account the importance of the retention for NORMA Group, the interests of data subjects in the deletion worthy of protection and the probability that a reported suspicion is true.

The general data protection information for the employment relationship contains further information on the relevant requirements when storing personal data of employees.

8. To what extent automated individual case decisions or profiling measures take place?

Neither automated individual case decisions nor profiling measures within the meaning of Art. 22 GDPR take place within the scope of investigation and reconnaissance measures.