



Data protection information on the SÜDPACK whistleblower system

In accordance with Art. 13, 14 GDPR we hereby inform you about the processing of the personal data you provide when using the whistleblower system, as well as any personal data we may collect and your rights in this regard.

SÜDPACK Verpackungen SE & Co. KG will only process personal data in connection with the whistleblower system in accordance with the applicable data protection regulations. This data protection information is supplementary to our general data protection information for the employment relationship.

Please take note of this data protection information carefully before submitting a report.

I. Name and address of the controller

The controller within the meaning of the General Data Protection Regulation and other national data protection laws of the member states as well as other data protection regulations is SÜDPACK Verpackungen SE & Co. KG, represented by Erik Bouts (Spokesman of the Management Board), Carolin Grimbacher (Managing Partner), Andreas Braun (Managing Director).
Address: Jägerstraße 23, 88416 Ochsenhausen, Germany
Phone: +49 7352 92501
E-Mail: info@suedpack.com
Website: <https://www.suedpack.com>

II. The data protection officer of the controller is

Mr. Helmut Dammann
SÜDPACK Verpackungen SE & Co. KG
Jägerstraße 23
88416 Ochsenhausen
E-Mail: Datenschutzbeauftragter@suedpack.com

III. Categories of personal data

The use of the electronic whistleblower system of SÜDPACK Verpackungen SE & Co. KG is voluntary. We only process data related to your use of the whistleblower system. You can report information about actual or potential misconduct via the contact form or by audio recording.

This is also possible anonymously: in the contact form without providing any personal data of the person making the report; in the case of audio recording, the voice is distorted. In this case, no personal data about the person making the report is collected.

If you disclose your identity to us, the following data will be processed as part of the contact form: Details of the reporting person, such as name, telephone number

(optional), the report case description, i.e., the circumstances of their observation with details of the accused person(s) (e.g. name, the department associated with the case, details of the actual or alleged breach of conduct and the relevant facts, e.g. date and place of the actual or alleged breach, information on whether other persons are aware of the breach), the IP address or ID of the computer from which the issue is reported. In the case of a report by audio recording, the audio recording of your human voice is stored as well as details of the departments associated with the case.

If you upload documents/media, you should be aware that they may contain metadata that may reveal the identity of the reporting person. If you wish to submit your report anonymously, you should therefore ensure that all metadata has been removed from the documents/media before uploading them to the whistleblowing system.

IV. Purpose of data processing

The purpose of data processing as part of the whistleblower system is to receive and clarify serious suspicions of breaches of regulations at SÜDPACK, in particular criminal acts in the area of white-collar crime and corruption.

V. Legal basis for data processing

The processing of personal data within the context of the whistleblower system is generally carried out on the basis of Art. 6 para. 1 lit. c) GDPR in conjunction with § 12 HinSchG. In other cases, the processing of personal data in the whistleblower system is carried out on the basis of Art. 6 para. 1 lit. f) GDPR to safeguard the overriding legitimate interest of SÜDPACK Verpackungen SE & Co. KG. This legitimate interest lies in preventing and combating corruption and in processing serious suspected cases of other breaches of rules in connection with SÜDPACK Verpackungen SE & Co. KG and to protect SÜDPACK Verpackungen SE & Co. KG and its employees from potential damage. Since the reporting of violations helps to avoid legal consequences such as criminal prosecution, claims for damages and immense damage to our image, the interests of the data subjects worthy of protection in the exclusion of processing or use do not prevail.

VI. Recipients / transfer of data

Only the responsible Compliance Officers and - if necessary - members of the Compliance Committee within our organization have access to the above-mentioned personal data that we process as part of the whistleblower system. Your personal data will not be passed on or otherwise transferred to third parties unless this

is necessary for the purposes of criminal prosecution. If required by law or orders from government bodies, personal data may be disclosed to them. There are no transfers of data to third countries.

VII. Duration of data storage

We adhere to the principles of data avoidance and data economy.

Personal data is stored for as long as is necessary to clarify and conclusively assess the report. After completion of the investigations, the personal data will be deleted within a maximum of 3 years in accordance with the legal requirements. In the event that judicial and/or disciplinary proceedings are initiated, the data may be stored until the conclusion of the proceedings or until the expiry of the time limits for legal remedies. Personal data in connection with unsubstantiated reports will be deleted immediately.

VIII. Rights of the data subjects

You have the right to obtain information from SÜDPACK Verpackungen SE & Co. KG about the personal data stored about you in accordance with Art. 15 GDPR.

The identity of the person providing the information is generally excluded from this right. If the exercise of this right jeopardizes the clarification of the facts or the securing of necessary evidence, SÜDPACK Verpackungen SE & Co. KG is permitted to exercise this right at a later date.

You also have the right to have incorrectly stored personal data corrected in accordance with Art. 16 GDPR and the right to erasure (Art. 17 GDPR) or to restriction of processing (Art. 18 GDPR), a right to data portability (Art. 20 GDPR) and a right to object to processing (Art. 21 GDPR).

You also have the right to lodge a complaint with the supervisory authority if you are of the opinion that the processing of your personal data violates data protection regulations (Art. 77 GDPR).