

Appendix 1: Data protection

§ 1 Legal basis of data processing

(1). Personal data is collected and stored as part of the whistleblower system. Only the data necessary for the sole purpose of the Directive or the use of a whistleblowing system in the OBO Group (hereinafter referred to as the Directive) is processed.

(2) The data will only be transmitted to authorized persons and also only to the extent that this is necessary for the purposes of the Directive; these are, in particular, internal and external bodies that must be involved in the investigations.

(3) The data is processed on the basis of Art. 6 para. 1 lit. f GDPR for legitimate interests of OBO Bettermann Holding GmbH & Co. KG, which outweigh the interests of the person concerned. Legitimate interests are ensuring compliance with the OBO Group; this includes the detection and clarification of operational malpractice, business-damaging and unlawful behaviour as well as the protection of employees, business partners, customers, etc.

(4) The legal basis specified in paragraph 3 also applies in the event that data is retained after the usual storage period has expired. The legitimate interests of the OBO Group are the assertion, the exercise of its own or defense against legal claims; these outweigh the interests of the person concerned.

§ 2 Rights of data subjects

(1) Affected persons are those whose personal data is processed as part of the procedure. This includes in particular the whistleblower and the person who may be reported.

(2) In principle, all data subjects have the right to request information from OBO Bettermann Holding GmbH & Co. KG in accordance with Art. 15 GDPR; in particular about the processing purposes and recipients of the data.

The right does not exist if the information reveals information that must be kept secret due to the overriding legitimate interests of a third party.

(3) All data subjects have the right to have their incorrect data corrected, to have it completed, to request the blocking of their data or their deletion, provided that the conditions according to Art. 16 et seq. of the GDPR are met. A request for deletion is justified, for example, if the data has been processed unlawfully, or the data is no longer required for the purposes for which it was collected.

(4) All data subjects may object to the processing on the basis of the legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR appeal. OBO Bettermann Holding GmbH & Co. KG will then either prove overriding interests worthy of protection, or the person will no longer process the data. For the time of this review, the data is blocked for these purposes.

(5) If a data subject considers that the data is not processed in accordance with the applicable data protection law, he or she may lodge a complaint with a data protection supervisory authority.

§ 3 Responsible Body and Data Protection Officer

(1) Responsible for processing your personal data at OBO Bettermann Holding GmbH & Co. KG:

OBO Bettermann Holding GmbH & Co. KG
Hüingser Ring 52, 58710 Menden, Germany
Telephone: +49-(0)2373-89-0
Fax: +49-(0)2373-89-238
E-mail: info@obo.de

For further information please refer to the imprint information on our website <https://www.obo.de/impressum/>.

The company data protection officer is always available for any questions and is your contact person on the subject of data protection. Contact details are:

OBO Bettermann Holding GmbH & Co. KG
- the Data Protection Officer -
Hüingser ring 52, 58710 Menden, Germany
Tel.: +49-(0)2373-89-1351
E-mail: datenschutz@obo.de

(2) The office for processing your personal data at the Ombudsperson is:

DR. WEHBERG & PARTNER mbB
Auditors, tax consultants and lawyers
Feithstraße 177, 58097 Hagen, Germany
Telephone: +49-(0)2331-1098-1234
E-mail: obo-hinweise@wehberg.de

Contact person for data protection at DR. WEHBERG & PARTNER mbB is:

DR. WEHBERG&PARTNER mbB
-the Data Protection Supervisor-
Feithstraße 177, 58097 Hagen, Germany
E-mail: datenschutz@wehberg.de

Further information can be found on the following Internet pages
<https://wehberg.de/impressum> and <https://wehberg.de/datenschutzerklaerung>.