

INFORMATION

Sierra Germany (fully identified below) in its capacity as controller, provides, pursuant to the GDPR (General Data Protection Regulation; Regulation (EU) 2016/679 of 27 April 2016) and any further legislation on data protection that is applicable, upon collection of personal data included in your report under HinSchG (Hinweisgeberschutzgesetz vom 31. Mai 2023, BGBl. 2023 I Nr. 140), the following information:

1. Identity and contacts of the controller	Sierra Germany GmbH, with register number HRB53615 at Amtsgericht Düsseldorf, and registered address at Hamborner Str. 53, 40472 Düsseldorf, Germany.
2. Categories/Types of personal data	The personal data may include the following types of personal data: (i) any identification or contact data of the whistleblower (or informant) provided in the report; (ii) any different personal data the whistleblower reveals in its report; (iii) any personal data of the informant the Controller may already have and which proves necessary for the adequate investigation and assessment of the violation reported.
3. Contacts of the data protection officer	The controller has a data protection officer: datenschutzbeauftragter@sonaesierra.com
4. Purpose(s) of processing	Compliance with the law on the protection of whistleblowers, notably receiving the report and managing the inherent investigation and the communications with the informant.
5. Legal basis for the processing	<p>The collection of the whistleblower's personal data in the case of a non-anonymous report is based on consent to the processing through the transmission of the data (implied consent) as permitted by Art. 6 para. 1 sentence 1 lit. a GDPR.</p> <p>The collection, processing and disclosure of personal data of the persons named in the report serves to safeguard the legitimate interests of Sierra Germany for which the whistleblower system is operated (Art. 6 para. 1 sentence 1 lit. f GDPR). It is a legitimate interest of the companies to detect, process, stop and sanction violations of the law and serious breaches of duty by employees throughout the center, effectively and with a high degree of confidentiality, and to avert associated damage and liability risks for the companies (Sections 30, 130 OWiG). Directive (EU)</p>

	<p>2019/1937 ("EU Whistleblower Directive"). § 12 HinSchG (Hinweisgeberschutzgesetz vom 31. Mai 2023, BGBl. 2023 I Nr. 140) also require the establishment of a whistleblower system in order to give employees and third parties the opportunity to report legal violations within the company in a protected manner. The associated data processing is expressly permitted by § 10 HinSchG.</p> <p>The disclosure of personal data in the case of non-anonymous reporting to other recipients may be necessary due to a legal obligation (Art. 6 para. 1 sentence 1 letter c GDPR).</p>
<p>6. Recipients or categories of recipients of the personal data</p>	<p>Competent authorities if the breach of the law reported is to be further reported to them.</p> <p>Sierra Germany has commissioned Fieldfisher X (Fieldfisher X Rechtsanwaltsgesellschaft mbH, Reinhardtstraße 47, 10117 Berlin, Germany) to operate the whistleblower system for Sierra Germany. Fieldfisher X assumes the overall function of the reporting channels and therefore also carries out an initial assessment of the incoming reports. For the operation of the platform, Fieldfisher X acts as a processor for Sierra Germany; the evaluation of incoming reports is carried out independently by Fieldfisher X as legal advice while maintaining confidentiality, also towards Sierra Germany.</p> <p>The "Friendly Captcha" service (www.friendlycaptcha.com) is used to protect the whistleblower system. This service is provided by Friendly Captcha GmbH, Am Anger 3-5, 82237 Wörthsee, Germany. Friendly Captcha is an innovative, data protection-friendly protection solution to make it more difficult for automated programs and scripts (so-called "bots") to use the whistleblower system. Before sending a message via the whistleblower system, the visitor's end device will establish a connection to the Friendly Captcha servers in order to receive a calculation task from Friendly Captcha. The visitor's end device solves the calculation task, which requires certain system resources. Based on the calculation result additional security rules may apply to protect the whistleblower system. The data is used exclusively to protect against spam and bots as described above. Friendly Captcha does not set or read any cookies on the visitor's end device. IP addresses are only stored in</p>

	<p>hashed (one-way encrypted) form and do not allow us or Friendly Captcha to draw any conclusions about an individual person. If personal data is stored, this data is deleted within 30 days. The legal basis for the processing is the legitimate interest in protecting the whistleblower system from abusive access by bots, i.e. spam protection and protection against attacks (e.g. mass requests), Art. 6 para. 1 lit. f GDPR. Further information on data protection when using Friendly Captcha can be found at https://friendlycaptcha.com/legal/privacy-end-users/.</p>
7. Transfer of personal data to third country/international organisation	Not applicable
8. Storage period of personal data	<p>The personal data will be stored in the respective procedure for as long as required for the clarification and final assessment, a legitimate interest of Sierra Germany or a legal requirement exists. This data is then deleted in accordance with legal requirements. The duration of storage depends in particular on the severity of the suspicion and the reported possible breach of duty.</p> <p>In general, the personal data will be stored for the maximum period of 5 (five) years. However, any personal data communicated by the whistleblower in the report and which is not relevant for the management of the reported violation will be deleted immediately.</p> <p>If the whistleblower system is used, the IP address used for data exchange is not stored beyond the duration of the connection. The data is assigned via a session cookie, which is deleted immediately after the end of the connection.</p>
9. Existence of automated decision-making including profiling	Not applicable

Additional Information:

A – Rights of the data subject

- The data subject may exercise before the controller with respect to the personal data concerning him/her and upon verification of the applicable legal conditions, the following rights:

Right of access,
Right to rectification,

Right to erasure (right to be forgotten),
Right to the restriction of processing,
Right to object,
Right to data portability.

For more information on the data subject's rights and the legal conditions for their exercise, please refer to articles 15 to 22 of the GDPR.

The data subject has also **the right to lodge a complaint with the competent supervisory authority.**

- The data subject can exercise its rights by e-mail to the following address:
datenschutzbeauftragter@sonaesierra.com

B – Provision of personal data: the provision of personal data in this context is neither a statutory or contractual requirement, nor is it a requirement necessary to enter into a contract; the data subject is not obliged to provide his/her personal data and should he/she choose not to no consequences will derive from it except for the impossibility to communicate to him/her the measures taken should he/she not have provided his/her contact.