

ANNEX 2: to GROUP WHISTLEBLOWING POLICY

PRIVACY NOTICES

TABLE OF CONTENT:

1. Privacy Notice for individuals <i>submitting</i> a report	2
2. Privacy Notice for individuals <i>mentioned</i> in a report	5

1. Privacy Notice for individuals submitting a report

Privacy Notice intended for individuals who submit a report (Whistleblower) and provide their personal data:

We would like to inform you that by submitting a report we will receive your application submitted through the dedicated channels of the RONAL GROUP which includes your personal data provided by you.

We value your privacy and assure you that your personal information will be treated with the utmost confidentiality. An access to personal data will be provided only to those RONAL employees who need to review the information as part of their job duties and on a need-to-know basis. Any personal information identifying specific individuals will be removed from the database as soon as possible after the completion of our investigation.

RONAL makes every effort to protect the privacy of individuals when investigating cases on the Compliance Hotline. You will find further information on how RONAL processes personal data on the Compliance Hotline in this Privacy Notice.

Fulfilling the obligation to provide sufficient notice under Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (Official Journal of the EU. L. of 2016 No. 119, p. 1, as amended) - hereinafter GDPR, we would like to inform you that:

1. The Data Controller of your personal data is the report receiving RONAL GROUP Entity (see referred list below). In case of involvement of multiple entities a co-controllership may be established.
2. To exercise the rights described in this document, please contact the respective [Privacy Expert](#) of the respective Data Controller (RONAL GROUP Entity) in your country who can be found under the provided link in the Intranet respectively if you are an external Whistleblower and don't have access to the list or the local Privacy Expert is unknown to you, you can use the contact listed in the Privacy Policy of the concerned RONAL GROUP Entity website. Alternatively, the Group Data Privacy Officer (DPO) listed on the RONAL GROUP website can be contacted as well. A list of the Data Controllers (RONAL GROUP Entities) can be found [here](#) or under the following address: www.ronalgroup.com/en/locations/.

Please note, the reporting will not necessarily be handled on Group Level, as it may for various reasons be forwarded to the concerned subsidiary. Therefore, the (Group) DPO may not be able to answer all specific questions.

3. Your personal data will be processed for the purpose of handling the Disclosure and for further investigation, e.g. the reported misconduct or violation by you, in line with the Data Controller's legal obligations pursuant to article 6 paragraph 1 letter c of the GDPR in connection with the whistleblowing directive (DIRECTIVE (EU) 2019/1937) (incl. local laws) as well as based on

legitimate interest in receiving, verifying and investigating reports of violations and misconducts (pursuant to article 6 paragraph 1 letter f of the GDPR).

4. Your personal data will be processed for the period indicated in respectively required for the process in the Group Whistleblowing Policy, until the purpose has been fulfilled, unless local laws indicate longer retention periods or based on the legitimate interest of the Data Controller. After the closure of the investigation of a case and the required retention period, the recorded cases shall be anonymized or deleted. For more information about data retention periods in your area, please contact the local Privacy Expert.
5. The Controller ensures the confidentiality of your data, in connection with the report received. Accordingly, your data may be shared only with entities authorized to do so by law or entities entrusted by the Controller with data processing, i.e. our platform service provider in Switzerland or a dedicated service provider mentioned in Annex 1.

In case of non-anonymous reporting your name may be disclosed to the persons investigating in the report. Subject to anonymous reporting, the identity of the Whistleblower may in exceptional cases be revealed to the concerned individual about whom a report is made in line with the local laws and privacy regulations.

6. We only process personal data necessary to receive a report of misconduct or violation, evaluate it, conduct an investigation and take possible follow-up actions. In the event that the report provides data that is not necessary to carry out the aforementioned actions, it will be deleted and will not be further processed.

In particular, we process the following categories of data:

- Name and surname,
- Position or information about the relationship you have or have had with the concerned RONAL GROUP Entity (in case you are not an employee),
- The contact information you have provided,
- Your voice (if the notification is made by telephone and the call is recorded),
- Other data provided in the notification, insofar as they are necessary to accept or evaluate the notification or to take any follow-up action.

Please note, the systems used by RONAL GROUP Entities allow an anonymized reporting but may be subject to legal permissibility in your country (see Annex 1 to the Group Whistleblowing Policy for further information).

7. You have the right to request access to your personal data, as well as their rectification (amendment). You also have the right to demand erasure or restriction of processing, as well as to object to processing, but you have the right only if further processing is not necessary for the Controller to comply with a legal obligation and there are no other overriding legal grounds for processing.

8. You have the right to lodge a complaint against the processing performed by the Controller to a relevant supervisory authority.
9. The provision of personal data is voluntary.
10. Your data will not be shared with a third country or international organization or other institutions not described above or in the Annex 1 of the Policy (e.g. Service Provider in the case of UK).
11. Your data will not be subject to profiling or automated decision-making.

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2. Privacy Notice for individuals mentioned in a report

Privacy Notice intended for individuals mentioned in a report (an individual to whom the report relates to or a witness):

We would like to inform you that you have been mentioned in a complaint filed through the dedicated reporting channels of the RONAL GROUP which includes your personal data.

We value your privacy and assure you that your personal information will be treated with the utmost confidentiality. An access to personal data will be provided only to those RONAL employees who need to review the information as part of their job duties and on a need-to-know basis. Any personal information identifying specific individuals will be removed from the database as soon as possible after the completion of our investigation.

RONAL makes every effort to protect the privacy of individuals when investigating cases on the Compliance Hotline. You will find further information on how RONAL processes personal data on the Compliance Hotline later in this Privacy Notice.

Fulfilling the obligation to provide sufficient notice under Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (Official Journal of the EU. L. of 2016 No. 119, p. 1, as amended) - hereinafter GDPR, we would like to inform you that:

1. The Data Controller of your personal data is the report receiving RONAL GROUP Entity. In case of the involvement of multiple entities a co-controllership may be established.
2. To exercise the rights described in this document, please contact the respective [Privacy Expert](#) of the respective Data Controller (RONAL GROUP Entity) in your country who can be found under the provided link in the Intranet respectively if you are an external Whistleblower and don't have access to the list or the local Privacy Expert is unknown to you, you can use the contact listed in the Privacy Policy of the concerned RONAL GROUP Entity website. Alternatively, the Group Data Privacy Officer (DPO) listed on the RONAL GROUP website can be contacted as well. A list of the Data Controllers (RONAL GROUP Entities) can be found [here](#) or under the following address: www.ronalgroup.com/en/locations/.

Please note, the reporting will not necessarily be handled on Group Level, as it may for various reasons be forwarded to the concerned subsidiary. Therefore, the (Group) DPO may not be able to answer all specific questions.

3. Your personal data will be processed for purposes related to reported misconduct or violation, including, in particular, for the purpose of investigating a whistleblowing report, conducting investigations, recording whistleblowing reports, taking possible follow-up actions, on the basis of: the Controller's legal obligation pursuant to article 6 paragraph 1 letter c of the GDPR as well as

based on legitimate interest in receiving, verifying and investigating reports of violations and misconducts (pursuant to article 6 paragraph 1 letter f of the GDPR).

4. Your personal data will be processed for the period indicated in respectively required for the process in the Group Whistleblowing Policy, until the purpose has been fulfilled, unless local laws indicate longer retention periods or based on the legitimate interest of the Data Controller. After the closure of the investigation of a case and the required retention period, the recorded cases shall be anonymized or deleted. For more information about data retention periods in your area, please contact the local Privacy Expert.
5. The Controller ensures the confidentiality of your data, in connection with the report received. Accordingly, your data may be shared only with entities authorized to do so by law or entities entrusted by the Controller with data processing, i.e. our platform service provider EQS in Switzerland or a dedicated service provider mentioned in Annex 1. Subject to anonymous reporting, the identity of the Whistleblower may in exceptional cases be revealed to the concerned individual about whom a report is made in line with the local laws and privacy regulations.
6. We only process personal data necessary to receive a report of misconduct or violation, evaluate it, conduct an investigation and take possible follow-up actions. In the event that the report provides data that is not necessary to carry out the aforementioned actions, it will be deleted and will not be further processed.

In particular, we process the following categories of data:

- Name and surname,
 - The contact information we have been provided,
 - Other data provided in the notification, insofar as they are necessary to accept or evaluate the notification or to take any follow-up action with regards to the reported case
7. We obtained your data from the person reporting a misconduct or a (presumed) violation.
 8. You have the right to request access to your personal data, as well as rectification (amendment). You also have the right to request deletion or restriction of processing, as well as to object to processing, but only if further processing is not necessary for the Controller to comply with a legal obligation and there are no other overriding legal grounds for the processing.
 9. You have the right to lodge a complaint about the processing carried out by the Controller to the relevant supervisory authority in your country.
 10. Your data will not be shared with a third country or international organization or other institutions not described above or in Annex 1 (e.g. Service Provider in the case of UK).
 11. Your data will not be subject to profiling or automated decision-making.

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