

GDPR INFORMATION CLAUSE

TO THE PERSON MAKING A NOTIFICATION UNDER THE PROVISIONS OF THE ACT ON THE PROTECTION OF WHISTLEBLOWERS OF 14 JUNE 2024

Pursuant to the provisions of the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: GDPR), the Company hereby informs you that:

1. PERSONAL DATA CONTROLLER

The controller of your personal data is thyssenkrupp Group Services Gdańsk Sp. z o.o. seat in Gdańsk, 472D Grunwaldzka St., 80-309 Gdańsk (hereinafter: "the Controller").

2. DATA PROTECTION OFFICER, CONTACT REGARDING PERSONAL DATA

The controller has appointed a Data Protection Officer who can be contacted at the following email address: dpo.gsg@thyssenkrupp.com or by post to the Controller's address as indicated above.

3. PURPOSES OF PROCESSING PERSONAL DATA AND LEGAL BASIS

Your personal data will be processed on the following legal basis and for the following purposes:

- verification and investigation of a whistleblower report - the legal basis for processing is Article 6(1)(c) GDPR, in relation to the Act of 14 June 2024 on the protection of whistleblowers (hereinafter: the 'Act'), i.e. a legal obligation incumbent on the Controller;
- the fulfilment of the Controller's legitimate interest in establishing, pursuing or defending against claims - the legal basis for processing is Article 6(1)(f) GDPR;
- where the whistleblower has consented to the disclosure of their identity, to the extent of disclosure the legal basis for processing is Article 6(1)(a) GDPR,
- where a special category of personal data is obtained that is processed as part of a notification made for reasons of substantial public interest - the legal basis for processing is Article 9(2)(g) GDPR.

4. RECIPIENTS OF DATA

Your data may only be passed on to entities authorized to do so by law and to entities entrusted by the controller with the processing of data on the basis of relevant contracts, such as, for example, the provider of a whistleblower system, email, data storage space.

Data may only be made available to unauthorized persons with your express consent.

5. RETENTION PERIOD

Personal data and other information in the register of internal notifications are retained for a period of 3 years after the end of the calendar year in which the follow-up actions were completed or after the proceedings initiated by these actions have been completed.

Personal data that are not relevant to the processing of the notification shall not be collected and, if accidentally collected, shall be deleted immediately. The deletion of such personal data shall take place within 14 days of the determination that it is not relevant to the case.

If the processing may involve claims, the data may be processed until the claims asserted are finally settled or the limitation period has expired.

6. RIGHTS

The person whose data is processed by the Controller in the framework of the investigation of a notification of a breach, within the limits indicated in the GDPR, has the right to request at any time access to personal data, their rectification, erasure, restriction of processing, data portability, withdrawal at any time of consent to the processing of data, if it was the basis of the processing, where the withdrawal of consent does not affect the legality of the processing performed before its withdrawal.

Data subjects also have the right to object at any time to the processing of their data, which takes place on the basis of Article 6(1)(f) of the GDPR - the objection should indicate the reasons justifying the request, related to the particular situation of the person.

If you consider that the processing of your personal data violates the regulations, you have the right to lodge a complaint with the President of the Office for Personal Data Protection, 2 Stawki Street, 00-193 Warsaw.

7. VOLUNTARINESS OF PROVIDING DATA

Submission of data by the person submitting a report on violation of the law is not obligatory. The controller allows submitting anonymous reports.

8. TRANSFER OF DATA TO THIRD COUNTRIES

As a general rule, your personal data will not be transferred outside the European Economic Area (hereinafter: EEA). However, having regard to the services provided by the Controller's subcontractors in the provision of support for ICT services and IT infrastructure, the Controller may outsource certain activities or IT tasks to recognized subcontractors operating outside the EEA, which may result in the transfer of your data outside the EEA. In particular, we use Microsoft solutions based in the USA and, as part of this cooperation, there may be a transfer of data to the extent necessary. Such transfer is based on the European Commission's decision of 10 July 2023 finding an adequate level of protection for personal data (the 'EU-US Data Privacy Framework', or Data Privacy Framework).

Recipient States outside the EEA, in accordance with the European Commission's decision, shall ensure an adequate level of protection of personal data in accordance with EEA standards. For recipients in the territory of the States not covered by the European Commission Decision, in order to ensure an adequate level of such protection, the Controller contracts with the recipients of your personal data, based on the standard contractual clauses issued by the European Commission in accordance with Article 46(2)(c) of the GDPR.

A copy of the standard contractual clauses can be obtained from the Controller by contacting the contact details provided above. The data security measures applied by the Controller comply with the principles provided for in Chapter V of the GDPR. You may request further information on the safeguards applied in this regard, obtain a copy of these safeguards and information on where they are available.

9. AUTOMATED DECISION-MAKING

Personal data processed by the Controller in the course of investigating a breach notification will not be subject to automated decision-making, including profiling.