

Data protection information for whistleblowers and other persons similarly affected in accordance with the General Data Protection Regulations (GDPR)

Freudenberg Group

The following information is intended to give an overview of how your personal information is processed by the Freudenberg Group's Ethics Offices. The Freudenberg Group has one central Ethics Office in Europe, the Corporate Ethics Office, and three regional Ethics Offices, the Regional Ethics Offices Asia, India and Americas. Freudenberg's Ethics Offices are an internal, confidential contact point for all employees and third parties (i.e. persons from outside the Freudenberg Group such as suppliers or customers).

Ethics Offices operations

The Corporate Ethics Office is the internal reporting channel for

- Information in accordance with EU directive EU 2019/1937 on the protection of persons who report infringements of European Union law ("EU Whistleblower Directive") and their national implementation laws.
- Information in accordance with the German Supply Chain Due Diligence Act on human rights and environmental risks and also infringements of human rights or environmental regulations which have come about through (i) Freudenberg's economic activities in its own business area or (ii) that of a direct or (iii) indirect supplier of Freudenberg.

The Corporate Ethics Office and all Regional Ethic Offices are the internal reporting channel for

- Information on infringements of laws either already committed or about to be committed by the company and infringements of our Business Principles, our Code of Conduct or other internal and external guidelines consistent with the aforementioned rules (collectively referred to as "Corporate Principles") and local conventions.

Who is responsible for data processing and who can I consult?

The Corporate Ethics Office of the Freudenberg Group operates as the central group-wide reporting point for information in accordance with the EU Whistleblower Directive as far as legally permissible, and the complaints body for companies belonging to the Freudenberg Group in accordance with the German Supply Chain Due Diligence Act. All European Freudenberg companies are thus autonomously responsible for this reporting and complaints body. The contact data for the respective companies and the respective data protection officer can be found on the respective homepage of the Business Groups via <https://freudenberg.com>.

Insofar as the Ethics Offices regard its task as being the internal reporting point for infringements of Corporate Principles, the sole responsible body is:

Freudenberg SE
Höhnerweg 2-4
69469 Weinheim

The responsible data protection officer is:

activeMind.legal Rechtsanwaltsgesellschaft m. b. H.
Potsdamer Strasse 3
80802 Munich
dataprotection-support@freudenberg.com

What data do we process?

Delivering your report may require the following personal data to be processed:

- Master data (including any personal data you provide as part of the process, including name, title, business contact information)
- Communication data

For what purpose and on what legal basis do we process your data?

- On the basis of statutory provisions (Article 6 Paragraph 1 lit. c) GDPR and Article 9 Paragraph 2 lit. g) GDPR).

Both the EU Whistleblower Directive including the national legal implementations (for example the German Whistleblowers Protection Act) and the German Supply Chain Due Diligence Act require an internal reporting point and/or a complaints process to be set up. For this, we process your data to check the information for plausibility and to pass on to the appropriate body if appropriate.

- In the context of the weighing up of interests (Article 6 Paragraph 1 lit. f) GDPR)

We process reports of infringements of Corporate Principles on the basis of our legitimate interest to pursue them. The awareness-raising and remedial measures taken can serve to improve internal compliance structures. Possible weaknesses can be uncovered and rectified.

- Based on your consent (Article 6 Paragraph 1 lit. a) GDPR)

In countries, in which consent is the only validly recognized legal basis to process your personal data, we rely on your informed consent (or a valid exception to consent) to process your personal data.

In addition, if you submit a message via the telephone function (Automated Messages Service (answering machine)), the processing of your voice recording is based on your consent, which you give voluntarily by leaving a message on our answering machine. If you do not want us to process your voice recording, you may not use the answering machine. Instead, you can provide your message via our Whistleblower Solution, which supports anonymous reporting on request. For information on how to withdraw your consent after you have left a voice message, please see the description of your rights below.

Who receives my data?

Your report will be directed to the members of those Ethics Office which is responsible for the country you have chosen in your report. The Members of the Ethics Offices are required to maintain confidentiality regarding the identity of the person passing on information, the person who is the subject of a report and other persons named in the report.

Internal (Freudenberg) recipients:

- In case of reports of infringements against the EU Whistleblower Directive including the national legal implementations and the German Supply Chain Due Diligence Act: here the Corporate Ethics Office is the central reporting and complaints point and passes the message on to the Freudenberg company affected (compliance, managers, HR).
- With reports of infringements against Corporate Principles: during processing it may be that the data – in co-ordination with the person passing on information and subject to their consent – is forwarded to the competent department at the corresponding Freudenberg company (e.g. Corporate Audit, Corporate Legal, Regional Ethics Office, compliance function of the company group affected).

External recipients (third parties):

With regard to the forwarding of data outside of the company it should first be noted that we only forward necessary personal data whilst taking care that the applicable data protection regulations are observed:

- During the processing of information being passed on it may be that external law firms are involved in processing in order to provide us with external legal advice and related legal services.
- As part of possible prosecution, it may be that the data is disclosed to state investigative units as part of legal obligations.

Further commission processors:

In addition, service providers can receive your data if it is necessary to fulfil our obligations (e.g. support/maintenance of data processing equipment applications and data destruction). All service providers are obliged to treat your data confidentially on the basis of a data processing agreement.

How long is my data stored?

The data is stored for as long as processing is taking place. Access to the data is limited and the data is deleted after 24 months at the latest once the respective process is officially over. Data is only stored for a longer period in the event that further legal steps are initiated and if so until they are concluded. Legal obligations to block or delete data at an earlier or later date remain unaffected.

Is data transferred to a third country outside the EU / EEA?

The Freudenberg Group operates worldwide, and for this reason your personal data may also be transferred to so-called 'third countries'. A third country is a country outside the European Union (EU) or the Agreement on the European Economic Area (EEA), where a level of data protection comparable to that in the European Union cannot be assumed per se.

Prior to such a transfer, we apply appropriate safeguards that the required adequate level of data protection is ensured in the third country or by the recipient in the third country. This can result in particular from a so-called 'Adequacy Decision' of the European Commission, establishing an adequate level of data protection for a specific third country as a whole. For all other third countries, we ensure the appropriate level of data protection through contractual agreements based on the so-called 'EU Standard Contractual Clauses'. All companies of the Freudenberg Group with headquarters outside the EU/EEA have committed themselves to ensuring the necessary adequate level of data protection by means of a group agreement (the Intragroup Agreement).

Further information on the appropriate and adequate safeguards to maintain an adequate level of data protection is available on request; contact details can be found at the beginning of this Privacy Statement.

What are my data protection rights?

Every person affected has the right to information in accordance with Article 15 GDPR, the right of correction in accordance with Article 16 GDPR, the right to deletion in accordance with Article 17 GDPR, the right to limitation of processing in accordance with Article 18 GDPR, the right to object in accordance with Article 21 GDPR and the right to data transferability in accordance with Article 20 GDPR. The right to be informed may lead to a limitation in accordance with Section 29 Paragraph 1 Clause 2 Federal Data Protection Act in conjunction with Section 8 Whistleblowers' Act.

Where consent is relied upon as the basis for processing your personal data, you can revoke consent you give us to process your personal data at any time. Please note that the revocation only applies to the future. Processing which took place before revocation is not affected.

In addition, the right to complain to a competent data protection authority exists (Article 77 GDPR), for example to the authority at your place of residence or to the authority which is responsible for us. A list of supervisory authorities (for non-public areas) with their addresses can be found at: <https://www.bfdi.bund.de/EN/Service/Anschriften/Laender/Laender-node.html>

You can exercise your data privacy rights by contacting us via the [Whistleblower Solution](#) (secure inbox) or by post.

Is there an obligation to provide data?

Making a complaint requires the processing of some personal data so that we can document the report, evaluate it, and take action. Without this personal data we will generally not be in a position to act on a report

Information on your right of objection in individual cases in accordance with Article 21 GDPR

You have the right to lodge an objection to the processing of personal data which concerns you at any time for reasons which arise from your specific situation on the basis of Article 6 Paragraph 1 lit. f GDPR (data processing on the basis of the weighing up of interests).

If you lodge an objection, we will no longer process your personal data unless we can prove compelling grounds worthy of protection for processing which outweigh your interests, rights and liberties, or if processing serves to assert, exercise or defend legal claims.

The objection can be made informally to the Corporate Ethics Office with the subject "Objection" by post to

Corporate Ethics Office Freudenberg
P.O. Box 100807
D-69448 Weinheim

or via the [Whistleblower Solution](#) (secure inbox).