

Whistleblower System

1 Purpose of Processing

We have established a whistleblower system. The whistleblower system allows individuals to contact us and report compliance and legal violations without fear of retaliation. To the extent permitted by law, reports may generally be submitted without providing personal data. We process personal data, if provided to us, to review the report submitted via the whistleblowing system and to investigate the alleged compliance and legal violations.

2 Data Processing Pursuant to Article 13 of the GDPR

We process the data that the whistleblower provides to us through their own statements as part of the report.

3 Data processing pursuant to Art. 14 GDPR

In addition, we process data of individuals named by the whistleblower in the course of reporting violations (e.g., names or job titles of the individuals who caused the violation, names or job titles of individuals also affected by a violation, descriptions of the behavior or actions of the affected individual in connection with the reported misconduct that could contribute to their identification).

4 Personal Data, Disclosure, and Legal Basis

In principle, the use of the whistleblower system—to the extent permitted by law—is possible without providing personal data. However, personal data may be voluntarily disclosed as part of the whistleblowing process, in particular information regarding identity, first and last name, country of residence, telephone number, or email address.

When using anonymous communication with us, the IP address and current location are not stored at any time. After submitting a report, the whistleblower receives login credentials for the online portal's mailbox to continue communicating with us securely.

To fulfill the purpose stated herein, it may also be necessary for us to transfer personal data to external parties such as law firms, criminal or competition authorities, both within and outside the European Union.

We process personal data, to the extent that we have received it, to the extent necessary to fulfill legal obligations regarding whistleblower protection, based on Article 6(1)(c) of the GDPR and local data protection laws.

5 Data Controller

The data controller responsible for the processing of personal data is tyromotion GmbH, which can be contacted using the following contact details:

tyromotion GmbH

Bahnhofgürtel 59

8020 Graz

Phone +43 (316) 908 909

Fax +43 (316) 2311 2391 44

Email: office@tyromotion.com

The “Whistleblower Software” reporting system is operated by Formalize Aps, which acts as a data processor within the meaning of the EU General Data Protection Regulation (“GDPR”). A data

processing agreement has been concluded with Formalize Aps. You can find Formalize Aps's privacy policy here: <https://whistleblowersoftware.com/en/personal-data-policy>.

6 Retention Period

We store personal data only for as long as is necessary to process your report or as long as we have a legitimate interest in storing your personal data. Data may also be stored if required by national or European legislation to fulfill legal obligations, such as retention requirements.

We neither collect nor store personal data that is not required for processing a report. Such data will be deleted immediately if applicable.

Upon completion of the investigation, reports and associated data will be retained only for as long as necessary, generally for a maximum period of five years, unless longer retention is required due to ongoing administrative or judicial proceedings or applicable legal obligations.

7 Your Rights

Data subject rights pursuant to Articles 13 through 21 of the GDPR do not apply to persons affected by a report under Section 8 (9) of the HSchG if this is necessary to protect the whistleblower or to investigate the report (e.g., right to information, right of access, right to erasure, right to object). For reports outside the scope of the HSchG, the general data protection regulations apply.

If you believe that we have violated Austrian or European data protection law in the processing of your data and thereby infringed upon your rights, you have the right to lodge a complaint with a data protection authority; in Austria, this is the Austrian Data Protection Authority:

- Address: Barichgasse 40–42, 1030 Vienna
- Phone: +43 1 52 152-0
- Email: dsb@dsb.gv.at