

Privacy Notice

The purpose of this Privacy Notice is to provide you with an overview of how **Rheinmetall 4iG Digital Services Ltd.** (hereinafter referred to as "**our Company**" or "**we**") processes your personal data in relation to the operation of our whistleblowing system (the so-called Ethics and Compliance Line).

This privacy notice will help you to understand how we use and process your personal data in connection with the whistleblowing system, explain to whom we transfer this personal data and explain your rights.

1. Who is the data controller?

The data controller is Rheinmetall 4iG Digital Services Llc. (registered office: 1037 Budapest Montevideo utca 2/c., e-mail address: dataprotection@r4ds.hu)

If you have any further questions about the processing of your personal data, please write to us at 1037 Budapest Montevideo utca 2/c. or send an e-mail to dataprotection@r4ds.hu.

2. For what purposes do we process your personal data?

We process your personal data for the following purposes:

- **Receiving and investigating whistleblowing reports:** we process your data in order to comply with our legal obligation to receive, investigate and take remedial action against allegations of wrongdoing or conduct that is in breach of our codes and regulations, and to inform you of our procedures, through the whistleblowing system (the so-called Ethics and Compliance Line).
- **Conduct of Ethics Committee proceedings:** if, based on the decision of the Compliance Officer, the Ethics Committee initiates proceedings, your data will be processed for the purpose of enabling the Ethics Committee to make a decision in connection with the alleged breach of standards and to take the necessary measures to remedy the conduct.
- **Disclosure of your personal data to the competent authorities:** if you have provided us with false data or information in bad faith and there are indications of a criminal offence or irregularity, we will disclose your data to the competent authority or, if it is likely that you have caused unlawful damage or other legal harm to another person, we will disclose your personal data at the request of the relevant authority.

3. What personal data do we process for the above purposes?

For the purposes described above, we process the following categories of personal data, that you provide them when making the report:

- **Your name;**
- **Your contact details** (mailing address, e-mail address, telephone number);
- **Information relating to the whistleblowing report:** information, evidence, documents provided to us in connection with the report and obtained during the investigation.

If you are a whistleblower and you do not provide us with your name or contact details, we will not be able to contact you to investigate your whistleblowing and we will not be able to fully investigate the conduct related to the whistleblowing.

In some cases, the data, information, documents and information you provide to us in relation to a report may allow us to identify you directly or indirectly.

4. Legal grounds and duration of processing

Where we process your personal data, we rely on the following legal grounds:

- We process your personal data in order to comply with a legal obligation to which we are subject ("**Legal Obligation Legal Basis**") pursuant to Article 6(1)(c) of the General Data Protection Regulation ("GDPR");
- The processing of your personal data is based on our legitimate interest ("**Legitimate Interest Legal Basis**") pursuant to Article 6(1)(f) of the GDPR.

The processing of your personal data is based on the following law in addition to the GDPR:

- Sections 18-29 of Act XXV of 2023 on Complaints, Notifications of Public Interest and the Rules for Reporting Whistleblowing ("**Whistleblowing Act**").

Below we describe the legal basis on which we rely for each data processing purpose, what personal data we process for that purpose, and how long we retain your personal data.

We only process your personal data for as long as it is necessary for the purposes for which it is collected. Once we no longer need your personal data, we will delete it. Different retention periods may apply to each data processing purpose, which are also detailed in the table below.

Purpose of the processing	Legal basis for processing	Personal data processed	Duration of processing
Receiving and investigating whistleblowing reports in the whistleblowing reporting system	Legal obligation	<ul style="list-style-type: none"> • Your name; • the contact details you provided; • information about the report. 	<ul style="list-style-type: none"> • If your report is unsubstantiated or omitted, for 60 days from the date of reporting. • If your report is substantiated or not withdrawn, pending the final outcome of the investigation and any action taken by the Compliance Officer (Ethics Committee proceedings, disciplinary proceedings, legal proceedings).
Conduct of Ethics Committee proceedings	Legitimate Interest	<ul style="list-style-type: none"> • Your name; • Your contact details ; • Information relating to the report. 	<ul style="list-style-type: none"> • Pending the implementation of measures to be taken on the basis of the Ethics Committee's decision, disciplinary proceedings or the final conclusion of legal proceedings.
Disclosure of your personal data to the competent authorities	Legal obligation	<ul style="list-style-type: none"> • Your name; • Your contact details; • information relating to the report. 	<ul style="list-style-type: none"> • Pending the final outcome of court or official proceedings.

5. Description of the legitimate interest with regard to personal data processed on the basis of legitimate interest

Purpose of the processing	Description of legitimate interest
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Conduct of Ethics Committee proceedings	Where the Compliance Officer initiates an Ethics Committee procedure on the basis of a report and its investigation, we have a legitimate interest in having an independent, impartial seven-member body decide on the alleged breach and initiate disciplinary or legal proceedings in relation to the unlawful or allegedly unlawful conduct.
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If you require further information about the legitimate interest assessment, please contact us at the email address below: dataprotection@r4ds.hu.

6. Recipients and categories of personal data

Your personal data will be treated confidentially under the whistleblowing system and our employees will have access to your personal data on a *need-to-know* basis. In this context, your data will only be accessible to the independent and impartial Compliance Officer investigating the report and, if the Ethics Committee procedure is initiated, to the members of the Ethics Committee, who will also act independently and impartially.

The Compliance Officer may share personal data with other employees only to the extent strictly necessary to conduct the investigation. If you have asked the Compliance Officer to keep your name and contact details private, only the Compliance Officer and, in the event of an Ethics Committee investigation, the Ethics Committee will have access to these details. *In some cases, however, the circumstances of the whistleblowing may still allow the person(s) involved in the whistleblowing and the employees involved in the investigation to draw direct conclusions about your identity.*

In addition, if you make an anonymous report to us, it is also possible that the person(s) involved in the report and the employees involved in the investigation may draw direct conclusions about your identity from the circumstances of the report.

We may transfer or disclose your personal data to third parties (such as courts, public authorities, competent bodies) if this is necessary for the purposes of court or official proceedings and we have the appropriate legal authority to do so.

In addition, we use the following service providers as data processors for the processing of the data detailed above:

Data Processor	Registered office of the data processor	Data processor's registered office
Microsoft Ireland Ltd.	One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland	Provision of email mail system services, Office 365 software related services.
Amazon Web Services EMEA SARL	38 Avenue John F. Kennedy, L-1855, Luxembourg	Hosting provider for the Ethics and Compliance Line on the r4ds.hu website.

7. Do we transfer your data to third countries?

We do not transfer your personal data to parties outside the European Economic Area (EEA). Where we transfer your personal data to parties outside the EEA, we will put in place appropriate safeguards to ensure that the transfer complies with the requirements of the GDPR.

Personal data may be transferred by Microsoft Ireland Ltd., the provider of the Office 365 mail system, or Amazon Web Services EMEA SARL, the hosting provider of the Ethics and Compliance Line, as data processors, to the United States or any other country where Microsoft Corporation or Amazon.com, Inc., their affiliates or other data processors operate.

Transfers are made by Microsoft Ireland Ltd. and Amazon Web Services EMEAL SARL in accordance with the provisions of Chapter V of the GDPR. Microsoft Corporation and Amazon Web Services, Inc. are listed under the European Union-U.S. Privacy Shield Framework, which ensures an adequate level of protection for personal data under the European Commission Implementing Regulation of 10 July 2023.

8. Automated decision-making, including profiling

No automated decision-making or profiling of personal data takes place.

9. Your rights

You have the following rights:

1. **Right of access:** you have the right to obtain confirmation from the controller as whether or not your personal data are being processed. Where we process your personal data, you have the right to know what information we hold about you and the circumstances in which we hold it.

In order to identify you, we may request additional information from you. Requesting a copy is free of charge, but we may charge a reasonable fee if you request additional copies.

2. **Right to rectification:** You have the right to obtain from the controller without undue delay the rectification of your inaccurate personal data, taking into account the purpose of the processing.
3. **Right to erasure:** You have the right to request the erasure of personal data relating to you if we no longer need it or if you have concerns about the lawfulness of the processing of your personal data.
4. **Right to restriction of processing:** During the restriction period, we will not carry out any operations on the personal data, except storage.

Where personal data are subject to such restriction, we may process the data only with your consent, for the establishment, exercise or defence of legal claims, for the protection of the rights of another natural or legal person, or for important public interests of the European Union or of a Member State.

5. **Right to data portability:** You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit those data to another data controller.

6. Right to object: In this case, we may no longer process your personal data unless we can demonstrate compelling legitimate basis for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. If your right to object is justified, we may no longer process your personal data for the purposes for which you objected.

11. Submission of a complaint, right to legal remedy

You have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information (registered office: 1055 Budapest, Falk Miksa utca 9-11.; E-mail:ugyfelszolgalat@naih.hu ; Telephone: +36 (30) 683-5969; +36 (30) 549-6838; +36 (1) 391 1400, Fax: +36 (1) 391-1410; website: <https://www.naih.hu/>.