

# Information Obligations in Accordance with Art. 13 and 14 GDPR

We hereby inform you about the processing of your personal data by FIOR & GENTZ and the data protection rights to which you are entitled under the General Data Protection Regulation as part of the whistleblowing process.

## Name of the Controller

FIOR & GENTZ Gesellschaft für Entwicklung und Vertrieb  
von orthopädietechnischen Systemen mbH  
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## Contact Data of the Data Protection Officer

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## Purpose and Legal Basis

We provide whistleblowers with the opportunity to provide information via the whistleblowing channel or in person to clarify suspected cases of breaches of regulations and criminal offences (corruption, bribery, theft, embezzlement, fraud, money laundering, bullying, etc.).

The following purposes are pursued as part of the whistleblowing process:

- compliance with the EU Whistleblowing Directive and the German Whistleblower Protection Act;
- provision of a reporting option for the whistleblowing process via a portal (anonymous and non-anonymous) and in person;
- processing of reports;
- checking the plausibility of information;
- investigation of misconduct and initiation of preliminary proceedings;
- prevention of future misconduct;
- implementation of the obligation to cooperate with law enforcement authorities.

The legal basis for the processing of personal data is the following:

- Art 6(1) lit c GDPR - Compliance with legal obligations (in conjunction with the EU Whistleblowing Directive and the German Whistleblower Protection Act). Furthermore, the disclosure of personal data may be necessary in the context of official or judicial measures.
- Art 6(1) lit f GDPR - In all other cases, the processing is based on our legitimate interest in the effective communication and processing of the information addressed to us. Furthermore, we have a legitimate interest in investigating misconduct within the company (Art. 6(1) lit. f GDPR).
- Art 6(1) lit a GDPR - If corresponding consent has been requested, the processing is carried out exclusively on the basis of your consent. Consent can be withdrawn at any time.
- Art. 88 GDPR - Processing in the context of employment (e.g. collective agreements)

## Categories of Personal Data

Whistleblowers can communicate both anonymously and using their personal data in the whistleblowing system.

If a report is not made anonymously, the following personal data will be processed:

- inventory data;
- contact data;
- content data;
- meta/communication data;
- all other data provided.

The following personal data of the accused is also processed:

- inventory data;
- contact data;
- content data;
- all other data that is provided.

## Sources of Personal Data

We collect personal data directly from the whistleblower (by providing it) and from the accused person. The data is collected via an online form using an online tool or verbally.

## Recipients of Personal Data

We only transfer your personal data for the purposes described above. Your data will be passed on to the following parties:

- service providers that we work with within the scope of order processing relationships;
- parties with whom we share joint responsibility;
- responsible internal employees (e.g. internal investigators);
- responsible whistleblower protection officer;

In special cases with a corresponding authorisation (e.g. court order):

- authorities: e.g. courts, law enforcement authorities;
- external reporting point.

## Data Transfer to a Third Country

Your data will not be transferred to countries outside the European Economic Area - EEA (third countries).

## Record Duration

The collected data is stored only for as long as is necessary in compliance with the legally required storage periods. According to § 11 of the German Whistleblower Protection Act: The documentation is deleted three years after completion of the procedure. The documentation may be kept for longer to fulfil the requirements of this Act or other legislation, as long as this is necessary and proportionate.

## Rights of Data Subjects

You have the following rights in accordance with the General Data Protection Regulation:

- right of access (Art. 15 GDPR);
- right to rectification (Art. 16 GDPR);
- right to erasure (Art. 17 GDPR);
- right to restriction (Art. 18 GDPR);
- right to object (Art. 21 GDPR);
- right to data portability (Art. 20 GDPR).

Consent given can be withdrawn at any time (Art. 7 (3) GDPR).

You also have the right to lodge a complaint with the competent supervisory authority (Art. 77 GDPR).

## Automated Decision-making

There is no automated decision-making or profiling.

## Obligation to Provide Personal Data

You are not obliged to provide the data, however, certain procedures cannot be processed in this case.