

## Principles of data processing

As part of the processing of reports under the Whistleblower Protection Act (HinSchG), your personal data will be processed by the controller and stored for the period required to fulfil the specified purposes and legal obligations. In the following, we will inform you about what data is involved, how it is processed and what rights you are entitled to in this regard, in particular with regard to the General Data Protection Regulation (GDPR).

## Who is responsible for data processing?

The controller within the meaning of data protection law is:

**rose plastic AG**, Rupolzer Str. 53, 88138 Hergensweiler / Lindau  
E-mail: [datenschutz@rose-plastic.de](mailto:datenschutz@rose-plastic.de), telephone: +49 (8388) 9200-0

## Our data protection officer

We have appointed a data protection officer in our company. You can reach him under the following contact options:

**IDKOM Networks GmbH** - Data protection officer, Dieselstraße 1, 87437 Kempten  
Thomas Hug, E-mail: [datenschutz@idkom.de](mailto:datenschutz@idkom.de), telephone: 0831/59090-400

## Which of your data do we process? And for what purposes?

We process personal data that is required to fulfil the specified purposes.

This may include the following personal data:

- Personal details (e.g. name, contact details)
- Image and sound data (e.g. video recordings, sound recordings, other photo recordings)
- and possibly other data comparable with the categories mentioned

If we have received data from you, we will only process it for the purposes for which we received or collected it, e.g.

- Processing your notification in accordance with §§ 17, 18 HinSchG
- Checking the reporting requirements
- Taking follow-up measures
- Information and consideration of further measures

## Sources of the data

We process personal data that we receive from you when you contact us or that you transmit to us via the whistleblower protection system. We use Whistleblower Software ApS, Kannikegade 4, 1, DK-8000 Aarhus C, Denmark as a collaboration tool.

## What is the legal basis for this?

The legal basis for the processing of personal data is Art. 6 para. 1 lit. e GDPR in conjunction with. § 10 HinSchG.

If personal data is processed on the basis of your consent, you have the right to **withdraw** your consent from us at any time with effect for the future.

## How long will the data be stored?

Your data will generally be deleted three years after completion of the procedure. The data may be stored for longer under the conditions of Section 11 (5) HinSchG, insofar as this is necessary and proportionate.

Of course, you can request information about your personal data stored by us at any time (see below) and, if it is not necessary, request that the data be deleted or processing restricted.

## To which recipients will the data be passed on?

Your personal data will not be passed on to third parties without your express consent. In certain cases, however, your personal data may have to be disclosed due to legal regulations or claims for information by third parties. In particular, if you intentionally or grossly negligently report incorrect information about offences, your identity is not protected (see Section 9 (1) HinSchG). In addition, your identity may be disclosed under the conditions of Section 9 (2) HinSchG, e.g. in criminal proceedings at the request of law enforcement authorities. In certain cases, it may also be necessary to disclose data to the data subject as part of a request for information (Art. 15 GDPR) or to fulfil information obligations (Art. 13, 14 GDPR), provided that this does not conflict with the protection of your rights and freedoms, for example.

## Transfer of personal data to a third country

There are no plans to transfer your personal data to a third country or an international organisation.

**Your rights as a "data subject" - You have the following rights:**

- in accordance with Art. 15 GDPR, you have the right to information about your personal data processed by us. In particular, you can request information about the purposes of processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right to lodge a complaint, the origin of your data if it was not collected by the controller, as well as the existence of automated decision-making including profiling and, if applicable, meaningful information about its details;
- in accordance with Art. 16 GDPR, to immediately request the correction of incorrect or incomplete personal data stored by the controller;
- in accordance with Art. 17 GDPR, to request the erasure of your personal data stored by the controller, unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims;
- in accordance with Art. 18 GDPR, to demand the restriction of the processing of your personal data if the accuracy of the data is disputed by you, the processing is unlawful but you refuse to delete it, the controller no longer needs the data, but you need it for the assertion, exercise or defence of legal claims or you have lodged an objection to the processing in accordance with Art. 21 GDPR;
- in accordance with Art. 20 GDPR, to receive your personal data that you have provided to the controller in a structured, commonly used and machine-readable format or to request that it be transmitted to another controller;
- in accordance with Art. 7 para. 3 GDPR, to revoke your consent to the controller at any time. This has the consequence that the controller may no longer continue the data processing that was based exclusively on this consent in the future and
- to lodge a complaint with a supervisory authority in accordance with Art. 77 GDPR. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or our company headquarters.

In the case of a request for information that is not made in writing, we ask for your understanding that we may then require proof from you that you are the person you claim to be.

Right of revocation: If you have given your consent to the internal registration office at IDKOM Networks GmbH, you can revoke it at any time for the future. This does not affect the legality of the data processing carried out on the basis of the consent until the revocation.

**Right to lodge a complaint**

You have the right to lodge a complaint about our processing of your personal data with a data protection supervisory authority:

Bavarian State Office for Data Protection Supervision, Promenade 27, 91522 Ansbach  
telephone: 0981 531300, fax 0981 53981300, E-mail: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de), Internet: [www.lda.bayern.de](http://www.lda.bayern.de)