

## **Data privacy notice for the whistleblower and other persons involved in an internal investigation – Short Version**

### **Your Data and Reporting to Schaeffler – Important Information**

At Schaeffler AG, we have a special office called Compliance Forensics & Investigations. This office is globally responsible to handle all reports (also called "hints" or "leads") about rule-breaking inside our company or involving people we work with, like suppliers or customers. You can send these reports through our online system, the "Schaeffler SpeakUp Line."

When you submit a report or support an investigation – such as by providing a witness statement – we may need to process certain personal information. Please rest assured that we do the utmost possible to protect your data always following the applicable rules, especially the General Data Protection Regulation (GDPR).

### **1. Who is responsible for my data?**

Schaeffler AG is the main company responsible to process your personal data. If your report involves another Schaeffler company, Schaeffler AG and that company act as joint controllers for the processing of your personal data.

You can always reach out to us or our Data Protection Officer if you have questions or want to exercise your data rights:

#### **Schaeffler AG**

Industriestraße 1–3, 91074 Herzogenaurach, Germany  
Email: [investigations@schaeffler.com](mailto:investigations@schaeffler.com)

#### **Data Protection Officer of Schaeffler AG**

Industriestraße 1–3, 91074 Herzogenaurach, Germany  
Email: [dataprivacy@schaeffler.com](mailto:dataprivacy@schaeffler.com)

### **2. Can I report without giving my name?**

Yes, you can submit a report without sharing your name or any other identifying information. It's completely up to you. However, sometimes giving your name can make it easier for us to understand the situation fully and ask follow-up questions if needed.

### **3. What kind of personal data might be used?**

We only use the personal data that you provide to us, either in your report or when you help with an investigation. We only collect information that is relevant to the report and the investigation itself.

This might include:

- **Your contact details:** Such as your name, address, phone number, and email.
- **Your relationship with Schaeffler:** Are you an employee, a business partner, or a customer?
- **Details about your report:** Like the date, time, language, and how you submitted it.
- **Information about the issue:** Everything you describe about the rule-breaking, including text, audio recordings, documents, and images you upload or that we find during our investigation.
- **Data from our investigation:** Any personal data we collect while looking into the report.
- **Employee information:** If you are a Schaeffler employee, some of your existing employee data might be used.
- **Technical data:** Like your computer's IP address if you use the Whistleblowing System, or your email address if you send a report by email.

### **4. Why do we use your data, and what gives us the right to do so?**

We use your personal data to:

- Identify, investigate, prevent, and take action against any rule-breaking.
- Handle any legal claims that might come up.
- Meet our legal duties and official requirements, including those aimed at safeguarding your rights and ensuring your protection.

We are allowed to process your data because:

- Laws require us to have a reporting system and to process the reports we receive.
- We have legitimate interests: This means we need to protect our company from damage, prevent legal problems, make our internal rules better, and clear people who might be wrongly accused. We always make sure that our interests don't outweigh your rights.

## 5. Who might see my personal data?

We share your data only with Schaeffler employees who absolutely need to see it to handle the report and the investigation. This means access is very limited, and we will keep your identity confidential unless it's truly necessary for the investigation and you've given your permission, or if the law specifically demands it (e.g., in court cases).

## 6. Will my data be processed outside of Europe?

Generally, we store and process your personal data on servers within the European Union (EU) and the European Economic Area (EEA). If a report involves international connections, your data might also be transferred to other countries outside the EU/EEA if it's necessary for the investigation. In such cases, we ensure that appropriate safeguards are in place, such as adequacy decisions by the European Commission or standard contractual clauses, to protect your personal data.

## 7. How long will my personal data be kept?

We keep your personal data for as long as needed to fully investigate and process your report. Once the case is closed, your data will be deleted according to our rules.

## 8. What are my data protection rights?

You have several rights regarding your personal data:

- **Right to access:** You can ask to see the personal data we hold about you and get a copy.
- **Right to rectify:** You can ask us to fix any inaccurate or incomplete personal data
- **Right to delete:** You can ask us to delete your personal data if there are valid reasons
- **Right to limit processing:** You can ask us to limit how we use your data if the legal conditions are met
- **Right to object:** You can object to us processing your personal data if it's based on our legitimate interests and your specific situation applies.
- **Right to withdraw consent:** If you've given us permission to use your data, you can take that permission back at any time.

To use any of these rights, please contact us using the details provided in section 1.

If you believe we haven't handled your data correctly, you also have the right to complain to a data protection authority.