

## **Privacy Notice pursuant to Articles 13 and 14 of the GDPR / Disclosure Requirements pursuant to Section 13 of the Whistleblower Protection Act**

The Drees & Sommer Group provides its employees and business partners with an **internal whistleblowing system** in accordance with the EU Whistleblower Protection Directive and the national whistleblower protection laws implemented in the respective national legislation of EU member states (“whistleblower protection regulations”). Use of the internal reporting channel is voluntary. Further details regarding the reporting channel and the reporting procedure can be found in [the Drees & Sommer Group’s Whistleblower Policy](#).

### **Privacy Notice pursuant to Articles 13 and 14 of the GDPR:**

- Drees & Sommer SE is **responsible** for the processing of personal data within the framework of the whistleblower system and operates the reporting channel for all companies belonging to the Drees & Sommer Group both within and outside Germany.
- The processing of personal data by the reporting office is based on Art. 6(1)(c) GDPR in conjunction with Sections 10 et seq. of the Whistleblower Protection Act (legal obligation) and, additionally, Art. 6(1)(f) GDPR (legitimate interest). Unless personal data is collected directly from the data subject, information is provided in accordance with Article 14 of the GDPR, taking into account the statutory exceptions.
- The processing of personal data is carried out for the **purpose** of receiving, reviewing, and handling reports of potential legal violations, implementing necessary follow-up measures, and fulfilling legal obligations under whistleblower protection regulations.
- In particular, disclosure may be withheld or postponed if the disclosure would reveal information that must be kept confidential pursuant to a legal provision or by its very nature, in particular due to the overriding legitimate interests of a third party (Art. 14 (5) GDPR in conjunction with §29 para. 1 sentence 2 BDSG).

- **Recipients** of personal data are exclusively the departments responsible for the whistleblower procedure within the respective company of the Drees & Sommer Group with seat in or possibly outside of EU. If necessary, personal data may be transferred **to external parties** (e.g., legal advisors, auditors, or competent authorities) to the extent that this is necessary to clarify the facts of the matter or to fulfill legal obligations.
- Personal data is **stored for the duration of the whistleblowing procedure** and deleted **no later than three years** after its conclusion, provided that no statutory retention or evidence obligations preclude deletion or that further storage is necessary for the pursuit or defense of legal claims.
- Data subjects have the right, in accordance with legal provisions, to access (Art. 15 GDPR), rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR), and objection to processing (Art. 21 GDPR).
- In addition, there is a right to lodge a complaint with a competent **data protection supervisory authority** or with **the data protection officer** if the data subject believes that the processing of their personal data violates the GDPR or other laws (Art. 77 GDPR). Contact details of the data protection officer:  
  
datenschutzbeauftragter@dreso.com
- Automated decision-making, including profiling pursuant to Art. 22 GDPR, does not take place within the scope of the whistleblower procedure.

As of May 2026