

Data protection information SpeakUp for participants

Data protection information for participants reporting misconduct and/or grievances that violate applicable law and/or our Code of Conduct.

We take the protection of your personal data seriously. We treat it confidentially and in accordance with the statutory data protection regulations (GDPR).

Purposes of data processing

We may process your personal data in order to investigate misconduct and/or grievances that violate applicable law and/or our Code of Conduct within the INDUS Group or at other stakeholders, e.g., in the event of complaints due to violations of legal positions protected by the Supply Chain Due Diligence Act (LkSG). This may be the case in particular if we list you as a participant or witness in this context. Data protection information for participants reporting misconduct and/or grievances that violate applicable law and/or our Code of Conduct.

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Legal basis

The legal basis for the processing of your personal data is, in particular, legal obligations under the Whistleblower Protection Act (Art. 6. para. 1 lit. c GDPR in conjunction with Art. 17 of Directive (EU) 2019/1937 ("EU Whistleblower Directive") and any other national regulations (e.g., with regard to matters relevant to criminal, competition, and labor law) for the implementation of the EU Whistleblower Directive. In accordance with the Whistleblower Directive and the national regulations for its implementation, we are legally obliged to provide a whistleblower system. If a report received concerns an employee of INDUS or an affiliated company, the processing also serves to prevent criminal offenses or other legal violations in connection with the employment relationship. This is based on Art. 6 para. 1 lit. f GDPR. Insofar as the aforementioned special categories of personal data are or become part of the reports or subsequent investigation proceedings, we process them on the basis of Art. 9 (2) lit. b GDPR in conjunction with Art. 9 (2) lit. f) GDPR and applicable national regulations.

The processing of personal data is also carried out on the basis of our legitimate interest (also in relation to third parties) in accordance with Art. 6 (1) sentence 1 lit. f) GDPR in conjunction with any applicable provisions of national laws on the prevention and detection of criminal offenses, breaches of duty and other violations, as well as our legitimate interest in averting damage and liability risks for our company. We have a legitimate interest in processing personal data for the prevention and detection of violations within our company, for reviewing the legality of internal processes, and for maintaining the integrity of our company. In particular, reference is made in this regard to the prevention and defense against administrative offenses and criminal offenses within the meaning of Sections 30 and 130 of the German Administrative Offenses Act (OWiG).

Personal data is also processed within the framework of a whistleblower system (complaint procedure) on the basis of Section 8 of the German Supply Chain Due Diligence Act (LkSG), among other things. The complaint procedure enables individuals to report human rights and environmental risks as well as violations of human rights or environmental obligations that have arisen as a result of the economic activities of a company in its own business area or of a direct supplier.

Source and categories of personal data

The personal data that we may process about you in this context may originate from whistleblowers (e.g., an employee or business partner of INDUS or an INDUS affiliate) or from our own research (e.g., by evaluating IT system logs).

Information used for identification purposes (e.g., names, personnel numbers, IP addresses) and information describing behavior during a specific period of time may be processed.

Recipients

We keep personal information confidential, but may need to pass it on to internal and external persons (e.g., experts) for further investigation.

Other recipients may include authorities and other bodies, insofar as this is necessary for criminal prosecution or to protect legal interests. In addition, service providers who provide or maintain our IT infrastructure may be able to view the data under certain circumstances; however, they are separately bound to confidentiality.

Storage period

Personal data will be stored for as long as it is necessary for the above-mentioned purposes or as long as required by statutory retention periods.

Your rights as a data subject

As a data subject, you have the following rights, provided that the legal requirements for this are met:

- Right of access, Art. 15 GDPR
- Right to rectification, Art. 16 GDPR
- Right to erasure, Art. 17 GDPR
- Right to restriction of processing, Art. 18 GDPR
- Right to data portability, Art. 20 GDPR
- Right to object, Art. 21 GDPR

If data processing is based on a balancing of legitimate interests, you have the right to object to this processing of data. To do so, you must have legitimate reasons arising from your particular situation.

You also have the right to complain to the data protection supervisory authority about data processing.

Automated decision-making

We promise to look into the case carefully. Decisions aren't made automatically, but are carefully checked and weighed up in each case.

Data controller and data protection officer

The operator of the whistleblower system is responsible for data processing:

INDUS Holding AG

Kölner Straße 32

D-51429 Bergisch Gladbach, Germany

Phone: +49 (0)2204/40 00-0

Email: indus@indus.de

The INDUS data protection officer can be contacted at:

fox-on Datenschutz GmbH

Pollerhofstr. 33a

D-51789 Lindlar

Email: dsb+indus@fox-on.com

This privacy policy was accessed and corrected on September 10, 2025.