



Privacy Notice for the Bauer Speak Up System

Content

Privacy Notice for the Bauer Speak Up System	1
1. Controller.....	2
2. Purpose.....	2
3. Legal basis.....	3
4. Categories of data subjects.....	3
5. Categories of personal data.....	4
6. The source of personal data	4
7. Access to and disclosure of personal data	5
8. Processing of personal data in EU/EEA countries.....	5
9. Data storage periods and data deletion.....	5
10. Automated decision-making	6
11. Rights of the Data Subjects.....	6



3. Legal basis

The processing is carried out on the basis of Art 6 (1) c GDPR to comply with the Directive (EU) 2019/1937 of the European Parliament and the implementing laws of the respective Group countries (see footnote1) and the German Law on Due Diligence of Companies in Supply Chains. In addition, the processing of personal data of persons, affected and involved in the reporting process is based on the legitimate interest of the controller to prevent, detect, investigate and remedy wrongdoing (Art 6 (1) f GDPR).

If a notification is related to the prevention of criminal offences or other legal violations of German employees of the Bauer Media Group Art 88 (1) GDPR in connection with § 26 (1) BDSG will be the legal basis.

Identification data of the reporting person will be processed with his/her consent (Art 6 (1) a GDPR). The consent to transfer personal data to the system is a voluntary action, because reports can be given anonymously.

Special categories of personal data may be g0 G[)]TETQ0.000 0 0 gf15 840.0037(i)-270.71S



MEDIA GROUP

conduct internal investigations within the relevant legal and internal framework.

7. Access to and disclosure of personal data

Only Case managers of the Group Compliance Team have direct access to



10. Automated decision-making

Automated decisions are defined as decisions about individuals which are based solely on the automated processing of personal data and which produce legal effects significantly affecting the individuals concerned.

Generally, personal data will not be used for automated decisions. We do not base decisions about individuals solely on the automated processing of personal data.

11. Rights of the Data Subjects

obtain confirmation as to whether personal data concerning him or her is being processed, and, where that is the case, access to and copy of the personal data;

request rectification of their personal data;

request restriction of processing of their personal data in the circumstances referred to in Article 18 of the GDPR;

request erasure of their personal data; or

object to the processing of their personal data in the circumstances referred to in Article 21 of the GDPR. These rights may be limited in specific circumstances, according to the GDPR.

To exercise any of your rights, you can send us a request, indicating the right you wish to exercise by e-mailing us at data.protection@bauermedia.com.