

I. Introduction

We would like to use the information below to provide you as the data subject with an overview of our processing of your personal data and your rights under data protection law.

The aim of this Privacy Notice is to inform you about the scope and purpose of the personal data we collect, use and process for the purpose of reporting via our portal in accordance with the Whistleblower Protection Act.

You may contact our data protection officer or our data protection coordinator directly at any time if you have any questions or suggestions regarding data protection.

II. Data controller

The data controller, as defined by the GDPR, is:

SPIR STAR AG

Auf der Rut 7, 64668 Rimbach-Mitlechtern, Germany

Phone: +49 (0) 6253-9889 0

E-Mail: privacy-policy@spirstar.de

Internet: www.spirstar.de

Data controller's representative: Ruben de Graaf

III. Data protection officer

The data protection officer is:

AR Datenschutz

Andreas Rößling

Bürgermeister-Arnold-Straße 3, 69483 Wald-Michelbach, Germany

Phone: +49 6207 920106

E-Mail: kontakt@ar-datenschutz.de

Internet: www.ar-datenschutz.de

IV. Information on the processing activity:

Purposes of the processing activity:

Receiving and processing of reports in accordance with the HinSchG [*German Whistleblower Protection Act*].

Legal basis of the processing activity:

The processing is necessary to fulfill a legal obligation in accordance with Article 6 Paragraph 1 Letter c GDPR (HinSchG).

Categories of recipients:

Processor (processor within the meaning of Art. 4 No. 8 GDPR in conjunction with Art. 28 GDPR)

Contractor (processor):

whistle.law GmbH (Sauerlach, Germany)

Data transfer to a third country:

No transfer of data to third countries planned.

V. Additional disclosure obligations

Retention period of personal data:

3 years (HinSchG) (3 years after completion of the procedure in accordance with Section 11 Paragraph 5 of the Whistleblower Protection Act)

Rights of the data subject:

You have a right to receive information (pursuant to Art. 15 GDPR) from the controller about the personal data concerning you as well as a right of rectification (Art. 16 GDPR), erasure (Art. 17 GDPR) and restriction of the processing (Art. 18 (1) GDPR). In addition, you have the right to object to the processing (Art. 21 GDPR) as well as the right of data portability (Art. 20 GDPR).

If you would like to exercise your rights, please contact the aforementioned data protection officer.

Right to lodge a complaint:

You have a right to lodge with the competent supervisory authority.

Obligation to provide personal data:

You are not obliged to provide the data.

Automated decision-making:

No automated decision-making or profiling will take place.