

## **The Wernsing Feinkost GmbH whistleblower system**

As a responsible and reliable company, we want to behave in accordance with the rules at all times - both externally and internally. In order for us to meet this requirement, it is important that we learn of potential misconduct and put a stop to it. By reporting misconduct, damage or legal consequences for us, our employees and the Group can be avoided.

It is important to recognize breaches of the rules in good time, investigate them immediately and rectify them promptly.

We have set up a whistleblower system for the confidential reporting of such violations. The whistleblower system guarantees the highest possible level of protection for whistleblowers and those affected.

For this purpose, Wernsing Feinkost GmbH has created several channels through which information about a breach of rules can be communicated. The whistleblower is therefore free to choose how they wish to inform Wernsing Feinkost.

To ensure that your report can be processed and investigated appropriately, it is important that the report is as specific as possible. It is helpful if you consider the following questions in your report:

Who? - What? - When? - How? - Where?

The following reporting channels are available:

### **1) (Anonymous/open) reporting via a whistleblowing platform**

You have the option of submitting reports via an internet-based communication platform. This is confidential and protected. You decide for yourself whether or not you wish to reveal your identity to the company.

We have set up a reporting office. Here we created an internal contact for compliance violations at your disposal that is responsible for reviewing the reports.

If you wish to submit a confidential report or transfer information in encrypted form, please use our [whistleblowing platform](#).

### **2) Direct contact with the internal reporting office**

You have the option of contacting our reporting officer personally. The reporting officer protects the identity of the whistleblower through their duty of confidentiality.

You can contact her by telephone, post or e-mail.

Wernsing Feinkost GmbH  
Isabell Heyer  
Kartoffelweg 1  
49632 Addrup-Essen  
Tel. 05438 / 51-605  
[hinweisgeber@wernsing-food-family.com](mailto:hinweisgeber@wernsing-food-family.com)

## Information regarding data protection notice

This data protection notice informs you which personal data we collect, process and use when you submit a report. We treat the protection of your personal data as a matter of high importance. We process your data strictly in accordance with the legal regulations, in particular the EU General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG revised version).

### 1. Data controller

The data controller in the sense of the GDPR is

Wernsing Feinkost GmbH, Kartoffelweg 1, 49632 Addrup-Essen,  
Tel. 05438/51-01, [info@wernsing.de](mailto:info@wernsing.de)

### 2. Data protection officer

For all questions relating to the processing of your personal data and the exercising of your rights under the GDPR, please contact our data protection officer

Isabell Heyer, Tel. 05438/51-605, [datenschutz@wernsing.de](mailto:datenschutz@wernsing.de)

### 3. Sources of personal data

We only collect personal data that the whistleblower consciously provides:

- Name
- e-mail address
- telephone number
- Other personal data that arises in the context of the description of the report

### 4. Purposes of the data processing and legal basis

The whistleblower system is available to employees of our company and third parties (e.g. customers, business partners, suppliers, employees of affiliated companies) for reporting information.

The whistleblower system is used to receive and clarify serious suspected cases of violations of Union law in accordance with EU Directive 2019/1937, in particular criminal offences that could endanger our company, as well as to record general process deficiencies and weaknesses that require appropriate action.

We have a legitimate interest in processing the personal data you knowingly provide in order to prevent and detect offences within our company, to check the legality of internal procedures and to protect our integrity. The lawfulness of the processing of personal data (of the whistleblower and the person affected by the report) is therefore based on Art. 6 para. 1 sentence 1 lit. f) GDPR in conjunction with Section 26 para. 1 sentence 2 BDSG. § Section 26 para. 1 sentence 2 BDSG, Art. 88 GDPR:

- The processing of personal data also results from a legal obligation in accordance with Art. 6 para. 1 sentence 1 lit. c) GDPR in conjunction with § Section 25a para. 1 sentence 6 no. 3 KWG.
- If the whistleblower wishes to disclose their identity intentionally or consciously, the legal basis for this information is consent in accordance with Art. 6 para. 1 sentence 1 lit. a) GDPR (conscious cancellation of anonymity). You have the right to revoke your consent at any time in accordance with Art. 7 para. 2 GDPR, although this would in fact only be effectively possible up to one month after the report has been made, as the accused person must be informed of the processing of his or her data and the identity of the whistleblower no later than one month after the report has been made in accordance with Art. 14 para. 3 lit. a) GDPR.

### 5. Recipient of your data

When breaches of conduct are reported, the designated department (e.g. Internal Audit, Compliance and any Group companies involved) receives the personal data for further internal processing.

Please note that in accordance with Art. 14 GDPR, the person concerned must be informed within one month of the report of misconduct without their knowledge, if necessary by disclosing the identity of the whistleblower.

Disclosure and processing of the data to an employee in the company affected by the report, insofar as this is necessary for clarification, requires the prior consent of the whistleblower. We would like to point out that in the event of this consent, the recipient may be obliged under Art. 14 GDPR to inform the person affected by the report one month after becoming aware of the identity of the whistleblower, but at the latest if this information would not jeopardize an effective investigation of the allegation or the collection of the necessary evidence. If a whistleblower gives consent to the disclosure of their identity, they can revoke this consent up to one month after the report has been made in accordance with Art. 7 para. 2 GDPR.

Freedom of seizure cannot be guaranteed. By order of the Bochum Regional Court of 16 March 2016, a seizure by the public prosecutor's office for the purpose of investigating the identity of a whistleblower was expressly permitted.

#### **6. Transfer to third countries**

We do not intend to transfer the data to any third country.

#### **7. Duration of data storage**

We store or delete the data collected in the course of investigating reports in accordance with the relevant data protection regulations, in particular in accordance with Art. 17 GDPR. Accordingly, we will generally delete your data when it is no longer required for the purposes stated in this data protection notice. However, statutory retention requirements or our legitimate interests may justify longer storage of your data.

#### **8. Data security**

We attend great importance to the utmost security of our system and use modern data storage and protection technologies to ensure that your data is optimally protected. All systems in which your personal data is stored are protected against access and are only accessible to a specific group of people.

#### **9. Your rights**

As a whistleblower and as a person named in the report, you have the following rights, in the context of which you can contact us or our data protection officer at any time using the details given.

- You have the right to obtain information about the personal data which we hold about you and/or to request copies of such data.
- You have the right to correct incorrect data and, if necessary, to have incomplete data completed.
- You have the right to have the personal data which we hold about you deleted if one of the reasons for deletion applies as defined in Section 17 DSGVO.
- You have the right to require us to restrict the use of your data if you deny the accuracy of the data, if the use is unlawful but you reject its deletion and we no longer require the data, however, you require it for the enforcement, exercising or defense of legal claims or you have lodged an objection to the use of the data in accordance with Section 21 GDPR.
- You have the right to receive your personal data, which you have made available to us, in a structured, conventional and machine-readability way or to request that it is to be transmitted to another responsible party.
- You have the right to refuse to allow the processing of your data - insofar as this is done in order to protect our legitimate interests in accordance with Section 6 f) GDPR - provided that there are reasons for doing so which could arise from your particular situation.
- You have the right to revoke the consent you have given us at any time, without affecting the legality of the processing which took place on the basis of the consent provided up until revoked.
- You have the right to lodge a complaint with the data protection supervisory authority if you believe that the handling of your personal data violates the law.

#### **10. Changes to the data protection information**

We reserve the right to adapt this data protection information to technical and legal developments at any time.