



Data Protection Information in accordance with the European Data Protection Regulation (GDPR) for the use of the MVV Whistleblower Hotline

The protection of your personal data is a top priority for MVV Energie AG (MVV). A notice or a message of a violation of human rights, environmental obligations, violations of the law or violations of EU regulations can be accompanied by the transfer of personal data.

This data protection information provides you an overview of the processing of personal data by MVV in the context of our whistleblower hotline.

- 1. Responsible** for the data processing is MVV Energie AG, Luisenring 49, 68159 Mannheim, Germany, compliance@mvv.de, +49 621 290 1094.
- MVV's **data protection officer** can be reached as follows:
Data Protection Officer, MVV Energie AG, Luisenring 49, 68159 Mannheim, Germany, datenschutz@mvv.de.
- In the context of breach notifications, our data processing includes the following information:**
 - Information personally identifying the person making the notice (e.g., name, address, contact information, gender), employment status or other relationship the person has with our companies.
 - Information about the persons identified in a notice as having committed the violation or with whom the identified person has a relationship (e.g., name, address, contact information, gender, other information that allows identification).
 - Information about third persons who are part of the described facts.

In the case of an anonymous notice, no personal data is collected about the person providing the note.

In addition, we process - to the extent necessary for the processing of the note - personal data that we obtain from publicly accessible sources (e.g. public registers, press, Internet) or that are transmitted by other third parties

- 4.** We process personal data for the purpose of investigations and preventing, detecting and / or following up on violations of applicable law.



This includes, in particular, the review and documentation of reports, internal investigations (including disclosure to external attorneys, auditors or other professionals bound by professional secrecy, as well as to affected Group companies) and, if necessary, disclosure to government agencies (such as the police, public prosecutor's office or courts).

In addition, information and reports can be used to identify risks to people, the environment and the company at an early stage and to develop a mutual understanding of the relevant risks.

5. The processing of personal data is based on the following legal bases:

- pursuant to Art. 6 (1) a) GDPR within the scope of the whistleblower's consent, insofar as the whistleblower has provided us with data on his or her identity,
- according to § 8 LkSG in connection with Art. 6 para. 1 lit. c) GDPR in the case of notices on the violation of human rights and environmental obligations,
- according to Art. 6 lit. c) GDPR due to legal requirements that affect us as a company,
- pursuant to Section 26 (1) Sentence 2 of the German Federal Data Protection Act (BDSG) in the case of processing personal data of employees for the purpose of uncovering criminal offences,
- pursuant to Art. 6 Para. 1 lit. f) GDPR to protect the legitimate interests of us or third parties, in particular companies of the MVV Group; our legitimate interest required for this purpose consists - depending on the specific individual case to be examined - in the processing of notices in order to be able to carry out follow-up measures, such as measures to check the validity of the allegations raised in the notice and, if necessary, to take action against the reported infringement, inter alia by means of internal inquiries, investigations, criminal prosecution measures, measures for the (re)collection of funds or conclusion of the proceedings.

6. Receiver of personal data

Personal data is transferred to third parties if it is necessary to process the received notification and there is a legal basis for this.

Personal data may also be transferred to our lawyer of confidence. You can find the corresponding data protection information here [Datenschutz - Feigen · Graf Rechtsanwälte \(feigen-graf.de\)](https://www.feigen-graf.de).

We also transfer your data to the following recipients who process your data in a permissible manner:

- Authorities for the fulfillment of legal reporting obligations, supervisory authorities and financial authorities as well as investigating authorities;
- external lawyers, auditors or other professionals who are bound to secrecy by professional law,
- IT, postal and other communication service providers.



Within the MVV Group, notices are submitted to the Compliance Officer as a central, independent and confidential unit acting on behalf of companies affiliated with MVV Energie AG. However, the original responsibility for following up and remedying a detected violation remains with the respective affiliated company in which the violation occurred or to which the violation is attributable, so that the notice on which the violation is based, and the personal data contained therein are also transmitted to the respective company.

7. Your data will be processed by us for the first time from the time of collection, insofar as you or a third party provide it to us. We delete the data accruing in this context after the storage is no longer necessary or restrict the processing if there are statutory retention obligations. The specific deletion period of the collected data depends on the case result of the specific notice and the type of violation.
8. **You have the right at any time to:**
 - a. request confirmation as to whether personal data concerning you is being processed by us, Art. 15 GDPR,
 - b. To request information as to whether and which personal data concerning you are processed by us, Article 15 DSGVO,
 - c. To request rectification, erasure and restriction of processing of personal data concerning you, Article 16 - 18 DSGVO,
 - d. Exercise your right to data portability, Article 20 DSGVO, and
 - e. object to the processing of personal data concerning you, Article 21 GDPR.

Please address the aforementioned requests to the address stated under item 1 or item 2. We will inform you by sending you copies or - if you submit the request electronically - in an electronic format.

In addition, you also have the right to lodge a complaint with the competent supervisory authority.

9. **You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6 (1) (e) or (f) DSGVO.** To exercise the right of objection, please contact the addresses listed under item 1 or 2.

We will no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the assertion, exercise or defense of legal claims.



- 10. If you have expressly given us consent to process your data, you are entitled to revoke this consent at any time with effect for the future.** To do so, please contact us at the addresses listed under section 1 or 2. This also applies to the revocation of declarations of consent that you gave us prior to the application of the GDPR on May 25, 2018. The revocation of consent is effective for the future and does not affect the lawfulness of the data processed until the revocation.

December 2022