

## DATA PROTECTION INFORMATION ON THE WHISTLEBLOWER SYSTEM

Data protection information on our processing of personal data in accordance with Art. 13, 14 and 21 of the General Data Protection Regulation (DSGVO)

In accordance with the requirements of Articles 13, 14 and 21 of the General Data Protection Regulation (DSGVO), we hereby inform you about the processing of the personal data you provide when using the whistleblower system, as well as any personal data we may collect, and your rights in this regard. In order to ensure that you are fully informed about the processing of your personal data in the context of using the whistleblower system, please take note of the following information.

### 1. Information on the data controller

The data controller is:

Cureus GmbH  
Management  
Schmalhorn 13  
29308 Winsen (Aller)  
Email: [kontakt@cureus.de](mailto:kontakt@cureus.de)

The data controller is the natural or legal person who alone or jointly with others determines the purposes and means of the processing of personal data (e.g. names, e-mail addresses or similar).

### 2. Data protection officer required by law

We have appointed a data protection officer for our company.

Cureus GmbH  
Data Protection Officer  
Schmalhorn 13  
29308 Winsen (Aller)  
Email: [datenschutz@cureus.de](mailto:datenschutz@cureus.de)

### 3. Purposes and legal basis of processing

We process your personal data in accordance with the provisions of the European Data Protection Regulation (EU-DSGVO) and the German Federal Data Protection Act (BDSG), insofar as this is necessary.

We collect and process personal data in order to pursue a legitimate interest of Cureus, to ensure compliance with applicable laws in all business areas of Cureus and to facilitate the provision of information by data subjects of Cureus about a suspected breach, as well as and to provide a response to requests made by you (Art. 6 para. 1 lit. f DSGVO).

We collect and process personal data in order to comply with legal obligations, which may arise from laws, regulations or European and/or national provisions (Art. 6 para. 1 lit. c DSGVO).

## 4. Categories of personal data

We only process data related to your use of the whistleblower system: by whom the report is made (name, email), and depending on the compliance issue reported, for example, the description of the alleged breach, the names of persons involved in the breach, date and location of the breach; information on whether other persons have knowledge of the breach; documents or evidence relating to the possible breach, the IP address or ID of the computer from which the issue is reported.

## 5. Recipients of the data

We will only disclose your personal data within our organisation to those areas and individuals who need to know that data in order to fulfil contractual and legal obligations or to implement our legitimate interests.

We may transfer your personal data to companies affiliated with us, insofar as this is permissible within the framework of the purposes and legal bases set out in section 3 of this data protection information sheet. Your personal data is processed on our behalf on the basis of order processing contracts in accordance with Art. 28 DSGVO. In these cases, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR.

Otherwise, data is only passed on to recipients outside the company if this is permitted or required by law, if the transfer is necessary to fulfil legal obligations or if we have your consent.

## 6. Transfer to a third country

A transfer to a third country is not intended.

## 7. Duration of data storage

We store your personal data for as long as is necessary to process your hint. Your personal data will be deleted after processing, unless longer storage is legally required or permitted. We store your personal data beyond this only to the extent that this is required by law or in a specific case for the assertion, exercise or defence of legal claims for the duration of a legal dispute.

## 8. Your rights

Every data subject has the right to information pursuant to Art. 15 of the GDPR, the right of rectification under Article 16 of the GDPR, the right to erasure under Article 17 of the GDPR, the right to restriction of processing under Article 18 of the GDPR, the right to notification under Article 19 of the GDPR and the right to data portability under Article 20 of the GDPR.

In addition, you have the right to lodge a complaint with a data protection supervisory authority pursuant to Art. 77 DSGVO if you are of the opinion that the processing of your personal data is not lawful. The right of appeal is without prejudice to any other administrative or judicial remedy.

If the processing of data is based on your consent, you are entitled to revoke your consent to the use of your personal data at any time in accordance with Art. 7 DSGVO. Please note that the revocation only takes effect for the future. Processing that took place before the revocation is not affected. Please also note that we may need to retain certain data for a certain period of time in order to comply with legal requirements (see section 7 of this privacy information).

## 9. Right of objection

Insofar as the processing of your personal data is carried out for the protection of legitimate interests in accordance with Art. 6 (1) lit. f DSGVO, you have the right to object to the processing

of this data at any time for reasons arising from your particular situation in accordance with Art. 21 DSGVO. We will then no longer process this personal data unless we can demonstrate compelling legitimate grounds for the processing. These must outweigh your interests, rights and freedoms, or the processing must serve the assertion, exercise or defence of legal claims. To protect your rights, please feel free to contact us.

## 10. Necessity of providing personal data

The provision of personal data within the whistleblower system is not required by law. You are therefore not obliged to provide personal data. However, please note that this may be necessary for the processing of your hint.

## 11. Automated decision-making

As the processing of your hint is not exclusively based on automated processing, no automated decision-making takes place in individual cases within the meaning of Art. 22 DSGVO.