



# Privacy Notice for the Bauer Speak Up System

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This privacy notice explains how we handle the processing of personal data within the Bauer Media Speak Up System ("the System").

## 1. Controller

Bauer Media Group (BMG) is a Group of companies with locations in several European countries<sup>1</sup>, controlled by Heinrich Bauer Verlag KG (HBV), that acts as controller of the System.

The Group Compliance Team is commissioned by all group companies with the provision of the system, the legal compliant processing of whistleblowing reports and organization of internal investigations within the relevant legal and internal framework. The scope of this privacy notice includes the processing within the SpeakUp channel, any reports submitted therein and the actions and investigations resulting therefrom. The use of the system is in accordance with the requirements of the General Data Protection Regulation (GDPR).

Contact information of the controller:

Heinrich Bauer Verlag KG  
Burchardstrasse 11  
20077 Hamburg

[Whistleblowing@bauermedia.com](mailto:Whistleblowing@bauermedia.com)

You can contact the Data Protection Officer of Heinrich Bauer Verlag KG under

[Data.protection@bauermedia.com](mailto:Data.protection@bauermedia.com)

## 2. Purpose

The System is provided to enable all BMG employees and third parties to raise concerns about possible misconduct or risks as described in the [Speak Up Policy](#). The aim of the processing is to find evidence of the facts described and to take action while protecting the whistleblowers.

The System covers the requirements of the Directive (EU) 2019/1937 of the European Parliament and the German Act on Corporate Due Diligence

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<sup>1</sup> Germany, UK, Poland, France, Sweden, Finland, Norway, Denmark, Spain, Portugal, Czech Republik, Slovakia



### 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 processed under the exception stipulated in Art 9 (2) g GDPR.

Any irrelevant or excess personal data is deleted, according to Art. 17 of the Whistleblowing Directive.

### 4. Categories of data subjects

HBV only processes data, that is strictly necessary for the purposes described in this privacy notice.

The data HBV processes includes following Data Subject categories:

1. reporting person - unless it is anonymous
2. the person assisting in the submission of the report
3. a person related to the reporting person
4. the person concerned by the notification
5. the witnesses
6. other persons indicated in the application

## 5. Categories of personal data

A reporting person is requested to provide the following mandatory information:

- A password to allow the reporter to retrieve the case at a later date and to allow an exchange with the compliance team.
- Country of the reporter,
- Relationship of the reporter to BMG (employee, non-employee, former employee),
- Business Area and Business Unit of the reporter (in case of an employee or former employee).

With this mandatory information it is not possible to identify the reporting person.

Furthermore, the reporter is asked to enter the report. On a voluntary basis, it can provide personal data about itself or leave an e-mail address so that it can be informed by the system about contact requests from the Compliance Team.

The report and/or the process of case handling may involve the personal data as follows :

- names and surnames of reporting person (unless he is anonymous), the person assisting in the submission of the report, a person related to the reporting person, the person concerned by the notification, the witnesses, other persons indicated in the application, personal data related to the reported event, other personal data application may contain including special categories of personal data conviction data (political opinions, natural person's sex life, sexual orientation, convictions)
- other personal data, such as names of employees, service providers, and other partners and observations of misconduct by these individuals. Information provided by the reporter may also contain special categories of personal data (such as information about a person's health, biometrics, beliefs, sexuality, criminal convictions).

## 6. The source of personal data

The persons involved within internal reportings (including but not limited to reporting person, witnesses etc.) or Bauer Media Group Companies which empowers Heinrich Bauer Verlag KG (HBV) to receive the Speak Up reports and



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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 personal data. If necessary personal data from reports may be transferred to other group companies of BMG. This is the case if the reported cases are processed on behalf of these group companies. e.g. because it concerns an employee of the company, or a supplier or other partner of this company. The Group compliance team will only transfer personal data if it is strictly necessary to fulfill the above-described purposes and under the above described legal bases.

If necessary personal data will also be transferred to competent state authorities, such as investigative authorities.

## 8. Processing of personal data in EU/EEA countries

For Data Security and confidentiality purposes, the Group Compliance Team processes data only within the SpeakUp System (also access of other group companies will happen within the system). The data center for the processing is located in Frankfurt (Germany) and disaster recovery is located in Paris (France). Because all group companies of BMG are located within the EU/EEA, access to the data will not happen from so-called third countries.

## 9. Data storage periods and data deletion

The Compliance Team observes the statutory retention periods of the respective country of the commissioning Group company. Reports based on the German Act on Corporate Due Diligence Obligations in Supply Chains are retained for 7 years. Reports based on the German Whistleblowing Act are retained for 3 years.

After the expiration of the retention periods, the data is deleted in a data protection compliant manner.



## 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](mailto:data.protection@bauermedia.com).