

Information pursuant to Art. 13 GDPR

Whistleblower Protection GlobalLeaks

Status:

October 9, 2025

1. Responsible

Responsible body in accordance with Art. 4 No. 7 GDPR	KERN LIEBERS GmbH & Co. KG
Street	Dr.-Kurt-Steim-Straße 35
Postal code / City	78713 Schramberg-Sulgen
Phone	07422 511-0
Email	info@kern-liebers.com
Website	kern-liebers.com

2. Legal representatives of the responsible party

Head of the responsible body	Dr. Erek Speckert Udo von Reinersdorff Dr. Wolfgang Gref
Responsible for data processing	Dr. Thomas Maier

3. Data protection officer

Name	Dr. Rainer Harwardt
Company	ORGATEAM Management Consulting GmbH
Address	Im Ettenbach 13a
Postal code / City	77767 Appenweier-Urlaffen
Phone	07805-918-2553
Email	rainer.harwardt@orgateam.org
Website	www.orgateam.org

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4. Purpose of data collection, data processing, data use, legal basis

Purpose:
The personal data processed within the framework of the whistleblower protection platform is used exclusively for the purpose of receiving, reviewing, and appropriately processing reports of possible violations of legal regulations, internal guidelines, or ethical standards. This includes in particular: • receiving and documenting reports, • communicating with whistleblowers (unless anonymous), • the examination and evaluation of the reported facts, • conducting internal investigations, • initiating any follow-up measures, • fulfilling legal obligations to provide evidence and documentation in accordance with the Whistleblower Protection Act (HinSchG) and the General Data Protection Regulation (GDPR). Processing is carried out exclusively by authorized employees of the responsible internal reporting office or compliance organization who are specifically bound to confidentiality. Data will only be passed on to third parties if this is required by law or necessary for processing the report.
Legal basis/permissibility of data collection:
1) Compliance with a legal obligation (Art. 6 (1) (c) GDPR) Processing is necessary for compliance with a legal obligation, in particular under the Whistleblower Protection Act (HinSchG), which requires the establishment and operation of a secure reporting channel. 2) Performance of a task carried out in the public interest (Art. 6 (1) (e) GDPR) Insofar as the processing serves to detect and prevent violations of the law, it is carried out in the public interest. 3) Legitimate interest (Art. 6 (1) (f) GDPR) Processing may also be based on our legitimate interest in investigating and preventing compliance violations, provided that this does not conflict with the overriding interests of the data subjects. 4) Consent (Art. 6 (1) (a) GDPR in conjunction with Art. 7 GDPR) If you voluntarily provide us with personal data (e.g., in a non-anonymous report), processing is based on your consent. This consent can be revoked at any time with effect for the future.

5. Description of the groups of persons concerned and the data or data categories involved

Group of persons	Data / Data category
Whistleblowers	Last name, first name, contact details, department, position (unless reported anonymously) Contents of the report (including personal data of third parties, accused persons, or witnesses) Technical data: IP address, timestamp

6. Information on the origin of the data

We process personal data that has been provided to us directly by the whistleblower as part of a report via the whistleblower protection platform. This information is provided in accordance with Art. 13 GDPR. In certain cases, we may receive personal data from third parties – for example, in the context of the circumstances described or through additional information provided in the course of further processing. In such cases, we will inform the persons concerned about the origin and processing of their data in accordance with Art. 14 GDPR, insofar as this is legally required and possible.

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7. Recipients or categories of recipients to whom this data may be disclosed.

Recipients	Compliance team
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8. Standard periods for the deletion of data and review

Data retention period (lifecycle, storage)	Personal data will only be stored for as long as is necessary to process the report. Data will only be stored for longer if there are legal retention periods or if the data is required to assert, exercise, or defend legal claims.
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9. Rights of data subjects

The applicable data protection law grants you comprehensive rights as a data subject (rights of access and intervention) vis-à-vis the controller with regard to the processing of your data, which we will inform you about below:

- Right to information pursuant to Art. 15 GDPR: As a data subject, you have the right to request information about the data we have stored about you free of charge.
- In addition, if the legal requirements are met, you have the right to rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR), and data portability (Art. 20 GDPR).
- If data processing is based on Art. 6 (1) e) or f) GDPR (data processing based on a legitimate interest), you have a right to object under Art. 21 GDPR. If you object to the data processing, it will be discontinued in the future, unless the controller can demonstrate compelling legitimate grounds for further processing that outweigh your interests, rights, and freedoms, or insofar as the processing serves to assert, exercise, or defend legal claims.
- If the data processing is based on consent pursuant to Art. 6 (1) (a) or Art. 9 (2) (a) GDPR, you may revoke your consent at any time with effect for the future. Please note that the revocation only applies to the future. Processing that took place before the revocation is not affected, i.e., the legality of the processing of your data up to the revocation is not affected by the revocation. Please also note that we may be required to retain certain data for a specific period of time in order to comply with legal requirements.
- If you believe that the processing of your personal data violates the GDPR, you have the right to lodge a complaint with a competent data protection supervisory authority (Art. 77 GDPR).