

# GF Transparency Line Privacy Statement

Updated 16 April 2025

## 1 Scope

Georg Fischer Ltd., incorporated in Switzerland under the company number CHE 108.778.486, and and of the companies directly or indirectly held by it (together "GF") consider the privacy and security of personal data a very important issue.

GF Transparency Line is the dedicated system GF provides to its employees and external stakeholders for secure and confidential reporting of suspected misconduct in GF business activities. This Privacy Statement describes how GF collects, processes and uses personal data in connection to GF Transparency Line.

**"Personal data"** means any information that identifies or could reasonably be used to identify you. GF treats personal data in accordance with the applicable data protection laws.

This policy is not necessarily a comprehensive description of GF data processing. Other data protection statements or similar documents may apply to specific circumstances.

**Please read this Privacy Statement carefully before sending a report via GF Transparency Line.** By using GF Transparency Line, you acknowledge that your personal data may be processed as described in this Privacy Statement. If you do not agree with this Privacy Statement, do not proceed to send a report through GF Transparency Line.

Please be aware the information you provide on the incident, persons involved, colleagues or other aspects, **may result in decisions that affect others.** Only share information **in good faith** and do not include unnecessary personal data in your report.

## 2 Controller

Georg Fischer Ltd., Amsler-Laffon-Strasse 9, 8021 Schaffhausen, Switzerland is the controller for processing your personal data for GF Transparency Line, as the parent company of GF Group.

Any inquiry for detailed information, comment, claim or concern related to this Privacy Statement and data privacy may be addressed to

- GF Head Corporate Compliance via email to [compliance@georgfischer.com](mailto:compliance@georgfischer.com); or
- Data Protection Officer via email [dataprotection@georgfischer.com](mailto:dataprotection@georgfischer.com); or
- via a letter addressed to either above: Georg Fischer Ltd., Amsler-Laffon-Strasse 9, 8021 Schaffhausen

## 3 Type of Personal Data, Methods and Processing Purposes

The personal data is **collected** through GF Transparency Line when a person sends information on a suspected incident that may violate our GF Code of Conduct, GF Code for Business Partners, the applicable laws or regulations or is otherwise not in line with how we do business at GF ('Report'). GF may also collect personal data related to the Report in actions we take to address the matter, including e.g. internal investigations.

When sending a Report through GF Transparency Line, anonymous reporting is available and providing personal data is voluntary. If you voluntarily provide or make available to GF personal data through GF Transparency Line, GF may collect and process such personal data for the purposes defined in this Privacy Statement or evident from the circumstances at the time of collection.

GF may collect the following personal data and information, if provided in the Report or in connection to the Report: name, contact details, language, role, job title, relationship with GF, information on the incident, names and other personal data of persons included. In internal investigations, applicable laws determine whether providing personal data is mandatory or voluntary, and what investigative measures are allowed for collection and use of personal data.

GF **processes personal data** received in connection with Reports to handle incidents, combat wrongdoing and the associated harm to GF, our employees, business partners and other stakeholders.

Depending on Report and incident, GF may process your personal data for fulfilling GF **mandatory legal obligations** under the Whistleblowing Directive and national legislation implementing it, where Report concerns a violation of European Union or European Union member national laws defined in the EU Whistleblowing Directive (2019/1937) and the national laws implementing it.

In addition, in line with the applicable law and where appropriate, GF may process your personal data for the following purposes which are in GF's **legitimate interest**, such as (i) efforts for preventing wrongdoing, fraud, non-compliance and misconduct potentially violating applicable policies, laws or regulations; (iii) maintaining contractual obligations; (iv) asserting legal claims and defense in legal disputes and official proceedings; (v) complying with applicable laws and regulations or governance principles generally recognized by large international organizations.

GF does not intend to process any special categories of personal data and will only process such personal data in accordance with and in the extent defined in applicable legislation, including EU Whistleblowing Directive or national legislation implementing it.

#### **4 What Happens to the Personal Data**

Reports received through GF Transparency Line are handled and managed by a small number of designated and trained employees primarily in GF Corporate Compliance team and/or specifically designated persons from legal entities where a local whistleblowing procedure is required under national law implementing the EU Whistleblowing directive.

Designated employees evaluate the matter and carry out any further investigation that may be required for addressing the specific incident.

#### **5 Personal Data Transfers**

In the context of the GF business activities and in line with the purposes of the data processing set out in this Privacy Statement, GF may transfer personal data to third parties, insofar as such a transfer is permitted and GF deems it appropriate, in order for them to process data for GF or, as the case may be, their own purposes. In particular, GF may disclose your personal data to third parties ("Recipients") in the following cases:

- (a) To other GF entities and to third-party service providers ("Processors") to which the GF controller entity delegates all or part of the processing in the course of handling or investigating a report (e.g. GF employees, international law firms and auditing companies

commissioned by GF, law enforcement agencies, antitrust authorities, or other administrative authorities and courts).

The Processors are allowed to use your personal data only for the purposes for which the personal data were originally collected. The Processors are carefully selected by the GF Controller. They are contractually obliged to handle your personal data exclusively on instructions of the GF controller entity, in accordance with this Policy and the applicable data protection laws, to keep the personal data confidential and to implement appropriate technical and organizational measures to protect the personal data.

- (b) The GF controller entity may also disclose personal data in connection with a merger, acquisition, bankruptcy or sale, assignment or other transfer of all or substantially all of its assets.
- (c) GF may disclose your personal data to certain public authorities in order to respond to appropriate request of legitimate government agencies or where required by applicable laws, court orders or government regulations.
- (d) GF may disclose personal data where this is needed for corporate audits or to investigate or respond to a compliance or security treat.

The Recipients may be located in Switzerland or in any country worldwide. If GF transfers data to a country without adequate legal data protection, GF ensures an appropriate level of protection as legally required by way of using appropriate contracts (in particular on the basis of the standard contract clauses of the European Commission) or GF relies on the statutory exceptions of consent, performance of contracts, the establishment, exercise or enforcement of legal claims, overriding public interests, published personal data or because it is necessary to protect the integrity of the persons concerned.

GF will not sell or otherwise transfer your personal data collected and processed for purposes in this Privacy Statement to any third parties.

## **6 Retention Periods**

GF processes and retains the personal data as long as required for the performance of the purposes for which they are collected or for compliance with the legal obligations or other purposes pursued with the processing, as well as beyond this duration in accordance with legal retention and documentation obligations. Furthermore, GF may retain personal data for the period during which claims can be asserted against GF or insofar as GF is otherwise legally obliged to do so or if legitimate business interests require further retention (e.g. for evidence and documentation purposes).

The personal data that is clearly unnecessary for handling the Report will be deleted without delay. For Reports in scope of Whistleblowing Directive or national law implementing it, Reports are stored for a maximum of five years from receiving the Report, if not otherwise required by applicable laws to protect GF's rights or obligations, or to draft, present or defend legal claims.

As soon as personal data is no longer required for the abovementioned purposes, it is deleted or anonymized to the extent possible. If personal data needs to be retained for legal reasons, the data will be stored in a format not allowing further processing.

## 7 Personal Data Security

GF has taken appropriate technical and organizational security measures to protect your personal data from unauthorized access, improper use or disclosure, unauthorized alteration and unlawful destruction or accidental loss. In particular, GF has implemented appropriate internal information security policies, training, IT and network security solutions, access controls and restrictions, encryption of data carriers and transmissions, pseudonymization, inspections.

All employees, Processors and other third parties that have access to personal data are obliged to keep the personal data confidential and safe. Physical material is stored in locked spaces with restricted access. Any IT systems are secured by means of the operating system's protection software. Access to the systems requires entering a username and a password, and data flows in high encryption channels. Logs are kept on changes in the user's case management tool, so that changes remain traceable.

GF Transparency Line system provider Navex technical and organisational measures include: Secure multi-factor authentication, Intrusion detection and prevention, Data encryption in transmission and storage, Activity logs by case and by users, Redundancy of data to prevent loss. Further information on the technical measures available in: <https://www.navex.com/en-us/products/navex-ethics-compliance/whistleb-whistleblowing-system/data-privacy-security/>

## 8 Your rights

Subject to the applicable law, you may have some or all of the rights listed below regarding your personal data, and you can assert these rights at any time:

- (a) Right to obtain confirmation of whether GF processes your personal data and, if so, to gain access to a copy thereof;
- (b) Right to rectify or obtain the erasure of your personal data as long as the applicable legal requirements are met (e.g. the prerequisites for the right of erasure provide in particular that the personal data is no longer necessary for the purposes for which they were collected or otherwise processed, for supporting litigation or for compliance with statutory retention requirements);
- (c) Right to restriction of processing under certain circumstances, in particular (i) where the accuracy of personal data is contested by you, for a period enabling GF to verify the accuracy of the personal data, (ii) where you oppose the erasure of the personal data (in cases where the right to erasure applies) and request the restriction of their use instead, (iii) where GF no longer needs the personal data for the original purposes, but they are required by you for the establishment, exercise or defense of legal claims, and (iv) where the successful exercise of an objection is still contested between you and GF;
- (d) Right to object to processing of your personal data, unless GF can demonstrate compelling legitimate interest for processing of your personal data.
- (e) Right to data portability of your personal data to a new supplier (if applicable);
- (f) Right to lodge a complaint with the relevant supervisory authority, in particular (i) the data protection authority that is competent for your place of residence, your place of work or the location of the alleged infringement, or (ii) the lead supervisory authority for GF, namely the Federal Data Protection and Information Commissioner FDPIC, Feldeggweg 1, 3003 Bern, Switzerland (<https://www.edoeb.admin.ch>);

- (g) Where any processing is based on consent, you may have the right to withdraw such consent at any time, without this affecting the processing prior to the consent withdrawal.

You can assert your rights [here](#) at any time. In general, exercising these rights requires that you are able to prove your identity (e.g. copy of identification documents).

GF reserves the right to enforce statutory restrictions, e.g. if GF is obliged to retain or process certain data, has an overriding interest or needs the personal data for asserting claims. GF may reject requests that are excessive or a misuse of the relevant rights. If exercising certain rights will incur costs on you, GF will notify you in advance.

## **9 Changes to this Policy**

This Privacy Statement is subject to change from time to time without notice.