

# **Data Protection Information**

## **Privacy Policy on E.ON Whistleblowing Channels**

We comply with the provisions of the EU General Data Protection Regulation ("GDPR") as well as applicable national data protection regulations. Please read this data protection information carefully before submitting a report.

### **Purpose of E.ON Whistleblowing Channels and legal basis**

The E.ON Whistleblowing System, the E.ON Whistleblowing Hotline and the E.ON Whistleblowing Mail (together "E.ON Whistleblowing Channels") are used to receive, process and manage reports of violations of rules in connection with E.ON SE and all affiliated companies ("E.ON") in a secure and confidential manner. The processing of personal data within the framework of the E.ON Whistleblowing Channels is based on Section 10 of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz - "HinSchG") and E.ON's legitimate interest (Article 6 (1) f) GDPR) in the detection and prevention of grievances and thus in averting damage to E.ON, its employees and customers.

In accordance with Section 11 (2) of HinSchG, reports via the E.ON Whistleblowing Hotline are stored on the basis of the consent of whistleblowers. The reports are stored permanently as an audio recording, i.e. until the end of the deletion period, so that they can be retrieved.

### **Type of personal data collected**

The use of E.ON Whistleblowing Channels is voluntary. When you submit a report via the E.ON Whistleblowing Channels, the following types of personal data and information are collected and processed:

- Any information you provide (including names or other personal data relating to persons named in your report)
- optional, if specified by you:

- Your name and contact details,
- The nature of your relationship with E.ON.

### **Confidentiality of reports**

Incoming information is received by a close circle of expressly authorized and specially trained employees of the reporting office and is always confidential within the meaning of Section 8 HinSchG.

As part of the processing of a report or to carry out a follow-up measure, it may be necessary to make information available to other E.ON employees, e.g. if the information relates to events in subsidiaries, for example. The latter may also be based in countries outside the European Union or the European Economic Area, where different regulations on the protection of personal data may exist. E.ON always ensures that the requirements of the HinSchG on confidentiality and the relevant data protection regulations are complied with when disclosing information.

All employees who have access to the data are obliged to maintain confidentiality.

### **Data Controller**

The Group Compliance & Data Protection department at E.ON SE operates E.ON's group-wide internal reporting office within the meaning of Section 12 of HinSchG. This means that Group Compliance & Data Protection ("Reporting Office") is the body responsible for data protection of the E.ON Whistleblowing Channels within the meaning of Art. 4 No. 7 GDPR. The E.ON whistleblowing channels are operated by a specialized company as a processor of E.ON SE, EQS Group GmbH, Karlstraße 47, 80333 Munich, Germany, ("EQS"). EQS ensures compliance with the applicable data protection regulations by means of appropriate technical and organizational measures.

All data is encrypted and stored with multiple passwords, so that access is limited to a very narrow circle of expressly authorized persons at E.ON.

### **Technical implementation and security of your data**

The E.ON Whistleblowing System and the E.ON Whistleblowing Hotline include an option for anonymous communication via an encrypted connection. Your IP address, your current location or your telephone number are not stored at any time during use. After submitting a report, you will receive access data to the secure mailbox so that you can continue to communicate with us in a protected manner.

The data you provide will be stored in a specially secured database of EQS in the European Union. All data stored in the database is encrypted according to the current state of the art. Inspection of the data is only possible by E.ON. EQS or other third parties have no possibility of decrypting this data and making it readable.

### **Information of the data subject**

In principle, E.ON is legally obliged to inform the persons named by you that the reporting office has received a report about them as soon as and as far as this information does not jeopardize the follow-up of the report or your protection as a whistleblower.

## **Rights of data subjects**

According to European data protection law, you and the persons named in the report generally have the right to information, correction, deletion and restriction of processing.

### **Right to object:**

**You and the persons named in your notification have the right to object to the processing of your personal data, if and to the extent that the processing of the data is based on E.ON's legitimate interest. If the right of objection is exercised, E.ON will immediately check to what extent the stored data is still necessary for the processing of a report.**

You can revoke your consent to the storage of an audio recording of your report via the E.ON Whistleblowing Hotline at any time with effect for the future.

To assert your rights, please contact: [datenschutz@eon.com](mailto:datenschutz@eon.com)

You also have the right to lodge a complaint with the supervisory authority.

## **Retention period of personal data**

Personal data will be retained for as long as it is necessary to clarify and conclusively assess the report and the proceedings based on it, as required by law or to comply with other legal provisions and/or as long as there is a legitimate interest of E.ON. After the expiry of these purposes and requirements, this data will be deleted in accordance with the legal requirements (in particular Section 11 para. 5 HinSchG).

## **Data transfers to third countries**

If you transmit personal data to us, the following applies to a transfer to a third country: E.ON has services carried out by carefully selected and commissioned service providers who are based outside the European Economic Area ("third country"), e.g. IT service providers. In these cases, a third-country transfer takes place. To the extent legally required to provide an adequate level of protection for your data, E.ON implements safeguards in accordance with legal requirements to establish an appropriate level of data protection, including EU standard contractual clauses. You have the option to request more information at any time.

The EU Standard Contractual Clauses are available at the following link: [EUR-Lex - 32021D0915 - DE - EUR-Lex \(europa.eu\)](#)

## **Sending attachments**

When submitting the report or sending a supplement, you have the option of uploading attachments. If you wish to submit a report anonymously, please note the following: Files may contain hidden personal data that compromises your anonymity. Please remove this data before sending, if you would like to report anonymously.