

Information on data protection in the whistleblowing system of CBR Fashion Group

1. General information

CBR Service GmbH and its affiliated companies pursuant to Section 17 of the German Stock Corporation Act (AktG) (together: "CBR Fashion Group" or "we") ensure compliance with the law by means of an appropriate compliance organisation, legally compliant processes and other measures to prevent and respond to breaches of the rules.

The whistleblower system of the CBR Fashion Group is an instrument for prevention and clarification.

The employees of the CBR Fashion Group ("employees") and external parties can use the various reporting channels of our whistleblower system to report possible committed or imminent violations of legal requirements, our Code of Conduct, the internal Compliance and Business Ethics Policy and the Social Code of Conduct applicable to suppliers, the social compliance requirements of the CBR Fashion Group applicable to suppliers as well as human rights and environmental risks or violations of human rights or environmental obligations in the supply chain of the CBR Fashion Group ("whistleblowing"), and thus contribute to their clarification and the prevention of violations.

In the following, we would like to inform you about the collection, processing and use of personal data when you submit a Notice via the digital CBR Fashion SpeakUp Line (by text or voice message), by letter to the Legal&Compliance Department or by personal appearance.

2. Persons responsible for data processing

The person responsible for the processing of your data in the sense of Art. 4 No. 7 DSGVO or Art.5 j. DSG (CH) is in each case the company of the CBR Fashion Group to which the received notice relates.

The whistleblower system is used by all companies belonging to the CBR Fashion Group. These are (as of 06/2023):

- CBR Service GmbH, Imkerstraße 4, 30916 Isernhagen, Germany
- CBR Fashion GmbH, Gerberstraße , 30916 Isernhagen, Germany
- CBR eCommerce GmbH, Sattlerstraße 10, 30916 Isernhagen, Germany
- Street One GmbH, Imkerstraße 4, 30916 Isernhagen, Germany
- Cecil GmbH, Sattlerstraße 10, 30916 Isernhagen, Germany
- Street One MEN GmbH, Imkerstraße 4, 30916 Isernhagen, Germany
- Street One Studio GmbH, Imkerstraße 4, 30916 Isernhagen, Germany
- CBR Fashion Retail GmbH, Imkerstraße 4, 30916 Isernhagen, Germany
- CBR Fashion Outlet GmbH, Imkerstrasse 4, 30916 Isernhagen
- CBR Fashion Denmark ApS, Jyllandsgade 28,1, 6400 Sønderborg, Denmark
- CBR Fashion Sweden AB, Krossverksgatan 9, 21616 Limhamn, Sweden
- CBR Fashion Norway AS, Hovfaret 4,NO- 0275 Oslo, Norway
- Street One SL, Calle Consejo de Ciento 341, 08007 Barcelona, Spain
- CBR Fashion Italy Srl, Dr. Streitergasse 32, 39100 Bolzano, Italy
- Street One Ltd, La Touche Place, Greystones, Co Wicklow, A63 FT54, Ireland
- CBR Fashion Ges.m.b.H, Grabenweg 64, 6020 Innsbruck, Austria
- CBR Fashion Austria Ges.m.b.H, Grabenweg 64, 6020 Innsbruck, Austria
- CBR Fashion Switzerland AG, Bahnhofstr. 28, 6304 Zug, Switzerland
- CBR Fashion Netherlands B.V., Zutphenstraat 89, 7575 EJ Oldenzaal, Netherlands
- CBR Fashion France SAS, 7 Avenue de l'Europe - Espace Européen de l'Entreprise, 67300 Schiltigheim, France

- CBR Fashion Belgium BV, Schaliënhoevedreef 20 C, 2800 Mechelen, Belgium
- CBR Fashion Outlet Ges.m.b.H, Grabenweg 64, 6020 Innsbruck, Austria
- CBR Fashion Outlet AG, Rütliweg 13, 4133 Pratteln, Switzerland
- CBR Fashion Outlet B.V., Zutphenstraat 89, 7575 EJ Oldenzaal, The Netherlands
- CBR Fashion Outlet Srl, Dr. Streitergasse 32, 39100 Bolzano, Italy

3. Purposes of the whistleblowing system and data processing

The purpose of the whistleblower system is to receive and process information about committed or imminent violations of laws, the CBR Fashion Group Code of Conduct, the internal Compliance and Business Ethics Policy, the CBR Fashion Group Social Compliance Requirements applicable to suppliers, as well as human rights and environmental risks or violations of human rights-related or environmental obligations in the CBR Fashion Group supply chain in a secure and confidential manner.

The purposes of the data processing are in particular:

- Checking the plausibility of information:
Prior to the initiation of clarification measures, a check is carried out to determine whether the information provided appears plausible and indicates a breach of the rules.
- Clarification of violations:
Clarification measures can be used, for example, to uncover and clarify breaches of duty under employment contracts or criminal offences, as well as breaches of rules and abuses within the company or supply chains, and to take follow-up measures.
- Prevention of future misconduct:
The results of the investigations are evaluated to determine whether compliance measures are necessary to prevent a recurrence. In this way, they contribute to preventing future violations or making them more difficult.
- Exoneration of wrongly accused persons:
In consultation with those affected, clarification measures are also taken to clarify allegations against those wrongly suspected and to exonerate them (so-called rehabilitation).
- Assertion or defence of legal claims:
If a violation has been established, the information collected in the course of the investigation can be used to assert or defend legal claims or to avert imminent economic or other damage to the company concerned.
- Examination of the relevance for other companies of the CBR Fashion Group:
If information concerns several companies of the CBR Fashion Group, it will be forwarded to the companies concerned if (and only to the extent that) this is necessary to clarify the matter or to initiate follow-up measures, or if the person concerned has consented to this.
- Communication with the whistleblower:
We will only use contact details provided to us when a tip-off is sent by regular mail or in the event of a personal appearance for queries relating to the tip-off sent. In the case of tips via the CBR Fashion SpeakUp Line, we will only use this for communication with the whistleblower.
- Implementation of duties to cooperate:
There may be a legal obligation to forward the data collected as part of the clarification measures to law enforcement agencies or other authorities, e.g. if a law enforcement agency initiates criminal investigation proceedings against a data subject.

4. Data or categories of data

The whistleblower is free to decide - regardless of the reporting channel chosen - what information he or she wishes to submit (no prescribed form or minimum information or automatic transmission of sender information such as telephone number or e-mail address).

We therefore only collect personal data to the extent that it is provided to us by the whistleblower.

This can be, for example, the name, the private address and the e-mail address or telephone number and, if applicable, the names and other personal data of the persons named in a tip.

In addition to the content of a report transmitted by the whistleblower, we record the time and the reporting channel through which a report was transmitted. When using the CBR Fashion SpeakUp Line, the whistleblower receives a report number and must create a password to enable communication in relation to the report.

5. Legal basis of the data processing

As of 17.12.2023, the Act for the Better Protection of Persons Providing Information (Whistleblower Protection Act - HinSchG) is applicable to the German companies of the CBR Fashion Group, so that as of this date, data processing of information provided by employees of the German-based companies of the CBR Fashion Group regarding violations of the laws and legal provisions listed in Section 2 of the HinSchG is carried out for the purpose of fulfilling the legal obligations arising from the HinSchG and thus on the basis of Art. 6 (1) lit.c DSGVO in conjunction with Section 10 p. 1 HinSchG.

Depending on the purpose of processing, however, data processing may be based on other regulations, in particular on Art. 6 para. 1 lit. c DSGVO in conjunction with §§ 16 ff. HinSchG, if the purpose is the establishment and design of the internal reporting office, the implementation of an internal procedure or the taking of follow-up measures, or on Art. 6 para. 1 lit. c DSGVO in conjunction with § 11 HinSchG, if your consent is required for the recording or verbatim logging of your report made by voice message or in the context of a personal conversation for the fulfilment of documentation obligations.

If the processing of special categories of personal data is absolutely necessary for the fulfilment of the purpose, the legal basis for this data processing is Art 9 Para. 2 lit g DSGVO in conjunction with § 10 S. 2 HinSchG.

As of 01.01.24, the German Supply Chain Compliance Obligations Act (Lieferkettensorgfaltspflichtengesetz - LkSG) is applicable to the CBR Fashion Group, so that as of this date the processing of data relating to human rights and environmental risks as well as to violations of human rights-related or environmental obligations that have arisen through the economic activities of the CBR Fashion Group companies based in Germany or of a direct supplier is necessary for the fulfilment of the legal obligation arising from the LkSG and thus on the basis of Art. 6 Para. 1 lit. c DSGVO in conjunction with § 8 LkSG.

Depending on the purpose of processing, however, data processing may be based on other regulations, e.g. on Art. 6 para. 1 lit. c DSGVO in conjunction with § 9 para. 1 LkSG for the fulfilment of documentation obligations.

If your information concerns a company of the CBR Fashion Group that is not subject to the obligations arising from the Whistleblower Protection Act (pursuant to § 12 para. 2 HinSchG) and/or concerns facts that do not fall within the scope of the Whistleblower Protection Act or the Supply Chain Security Obligations Act, the data processing is based on a legitimate interest pursuant to Art. 6 para. 1 lit. f DSGVO or Art. 31 DSG (Switzerland). In particular, our legitimate interest is to prevent damage to the company or to enable us to defend against or assert legal claims. A legitimate interest may also lie in the fact that investigative measures can indirectly uncover and eliminate weaknesses in our internal

compliance structure. We will only process data on the basis of our legitimate interest if this is not outweighed by the legitimate interests of affected third parties.

If information serves to uncover possible criminal offences in the context of employment relationships of employees of the German companies of the CBR Fashion Group, the processing of such information may also be justified in accordance with Section 26 (1) sentence 2 of the German Federal Data Protection Act (BDSG).

6 Disclosure of personal data

Incoming information will be received and treated confidentially by the authorised employees of the CBR Service GmbH Legal & Compliance department.

Within the framework of the processing of reports or an investigation, it may be necessary to pass on information to employees of the CBR Fashion Group outside the Legal&Compliance department entrusted with the investigation, e.g. if the information relates to events at a subsidiary of the CBR Fashion Group or concerns several companies of the CBR Fashion Group and the transfer is necessary for follow-up measures. If the information is passed on to a subsidiary of the CBR Fashion Group in a country outside the European Economic Area, we ensure that sufficient data protection guarantees are in place to protect the data subjects. Currently, only one company of the CBR Fashion Group has its registered office outside the EEA (Switzerland). For this country, there is a sufficient guarantee in the form of an EU adequacy decision.

In addition, in the context of follow-up measures, it may be necessary for your personal data to be transferred to law enforcement authorities, cartel authorities, other administrative authorities, courts and international law firms commissioned by CBR Fashion Group.

In certain cases, there is an obligation under data protection law to inform the accused person of the allegations made against him or her. This is required by law if it is objectively determined that the provision of information to the accused person can no longer impair the concrete clarification of the information. Your identity as a whistleblower will not be disclosed - as far as legally possible - and it will be ensured as far as possible that no conclusions can be drawn about your identity.

Finally, your personal data will be transferred to People In-touch B.V., the Netherlands, to the extent described above for the technical implementation of the whistleblowing system "CBR Fashion SpeakUp Line". For this purpose, we have concluded an order data processing agreement to ensure data protection with the provider.

In the CBR Fashion SpeakUp Line, we also store and process notices that are sent by regular mail to the Legal&Compliance department or in the course of a personal appearance. This measure serves to optimise case management.

In any case, personal data will only be passed on or only to the extent permitted by the respective legal basis.

7. Duration of storage

Personal data will be stored for as long as is necessary for the clarification and final assessment, a justified interest of the CBR Fashion Group or a legal requirement or legal retention periods exist.

Information pursuant to the Whistleblower Protection Act will be retained for three years after the conclusion of the proceedings for documentation purposes and information pursuant to the Supply Chain Duty of Care Act will be retained for seven years, unless other legal provisions require longer retention.

In the event that judicial and/or disciplinary proceedings are initiated, retention may continue until the conclusion of the proceedings or the expiry of the time limits for appeal.

8. Your rights

According to European data protection law, you have the right to information (Art. 15 DSGVO), correction (Art. 16 DSGVO), deletion (Art. 17 DSGVO), restriction of processing (Art. 18 DSGVO) and in certain cases the right to data transfer (Art. 20 DSGVO).

In addition, you may object to the processing of your personal data on grounds relating to your particular situation, provided that the data processing is carried out in the public interest or on the basis of a balancing of interests (Art. 6 para. 1 lit. f DSGVO). The objection can be made without formalities and should be sent to the contact details listed in this data protection notice, insofar as the notice is concerned.

Pursuant to Art. 77 DSGVO, you also have the right to lodge a complaint with a supervisory authority if you are of the opinion that the processing of the data concerning you violates data protection regulations. The right of complaint can be asserted in particular before a supervisory authority in the Member State of your habitual residence, your place of work or the place of the alleged infringement.

9. Your contact persons

To exercise your rights in relation to the whistleblower system and for further information on data protection in this respect, please contact CBR Service GmbH, -Confidential Department Legal&Compliance, Imkerstraße 4, 30916 Isernhagen, Germany, or use the digital whistleblower system at <https://cbrfashion.speakup.report/de-CH/hints/home>

In addition, the external data protection officer of the following companies, Dr. Uwe Schläger, datenschutz nord GmbH, Konsul-Smidt-Straße 88, 28217 Bremen, Germany, e-mail: office@datenschutz-nord.de, is available to you as a contact for data protection-related concerns:

- CBR Service GmbH
- CBR Fashion GmbH
- CBR eCommerce GmbH
- Street One GmbH
- Cecil GmbH
- Street One MEN GmbH
- Street One Retail GmbH
- Cecil Retail GmbH
- CBR Fashion Outlet GmbH.

Isernhagen, August 2023