

# DATA PRIVACY NOTICE

Data privacy regulations require that a person making a report containing personal data must be notified of certain collection and retention practices regarding information submitted through this system.

Integrity Helpline is a confidential online reporting system provided by Yanfeng ("the Company") to allow you to ask questions and to report incidents relating to financial, accounting and auditing, bribery and other matters. Use of the Integrity Helpline is entirely voluntary.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the Company's operations may result in decisions that affect others. We therefore ask you to provide only information that, to the best of your knowledge, is correct. You will not be sanctioned for submitting information in good faith. However, if you knowingly provide false or misleading information, it may result in disciplinary action. The information you submit will be treated confidentially. We encourage you to identify yourself so that we can follow up with questions we might have.

### Identity of data controller & contact details

The Company's central controller is Yanfeng International Automotive Technology Europe S.a.r.I. & Co. KG, Jagenberstraße 1, 41468 Neuss (Germany). In case of any questions or enquiries please reach out to <u>privacy@yanfeng.com</u>. You can also contact the Data Privacy Officer at <u>dsb-yanfeng@migosens.net</u>.

#### Purpose & legal basis

The Company uses your data on the basis of its legitimate interests to prevent and investigate compliance violations, including the preservation of evidence (Art. 6 I lit. f) GDPR). In addition, the Company is obliged to set up a whistleblower hotline and to process the personal data required to fulfill this obligation in accordance with the EU Whistleblower Directive (Art. 6 I lit. c) GDPR).

#### Recipients of the personal data

Your personal information may be shared with other Yanfeng entities on a need-to-know basis as part of an investigation. In addition, the Company may engage law firms to assist in investigations. In this case, your personal information may also be shared with them. Also, the Company works with service providers (e.g., Navex) who also have access to your personal information to provide their services.

#### Storage period

The Company stores your personal data for the duration of the investigation and after its completion for as long as is necessary to comply with legal retention periods or to fulfill legitimate interests of the Company.

#### Data subject rights



You have the right to obtain confirmation from the Company as to whether personal data concerning you are being processed; if this is the case, you have the right of **access** to the personal data and to the information listed in detail in Art. 15 GDPR.

You have the right to obtain from the Company without undue delay the **rectification** of inaccurate personal data concerning you and, where applicable, the completion of incomplete personal data (Art. 16 GDPR).

You have the right to obtain from the Company the **erasure** without delay of personal data concerning you, provided that one of the reasons listed in detail in Art. 17 GDPR applies, e.g. if the data is no longer needed for the purposes pursued.

You have the right to request the Company to **restrict processing** if one of the conditions listed in Art. 18 DSGVO applies, e.g. if the data is no longer needed for the purposes pursued.

You have the right to **object** at any time, on grounds relating to your particular situation, to the processing of personal data concerning you. The Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override you interests, rights and freedoms or for the establishment, exercise or defense of legal claims (Art. 21 GDPR).

Without prejudice to any other administrative or judicial remedy, you have the **right to lodge a complaint with a supervisory authority** if you think that the processing of personal data concerning you infringes the GDPR. You may exercise this right by contacting a supervisory authority in the Member State where you are located, work or the place of the alleged infringement.

## The (not) existence of automated decision-making

The Company does not use any form of automated decision-making in this context.

## What Information is collected?

On the Integrity Helpline site, you may directly submit to the Company the following information: your name and contact details, any question you may have, the name and title of all individuals you may be reporting, and a description of any questionable conduct, including all relevant details.

## How will the Information be used?

All the information will be stored on the Integrity Helpline database hosted by EthicsPoint, Inc. in the USA ("EthicsPoint"). The Company and EthicsPoint have entered into special contract to protect personal information (SCC). Unless required by law or litigation, the information in the Integrity Helpline database may only be reviewed and used by those entitled individuals who need to know the data to fulfill their job duties. These individuals may include appropriate human resources, audit, legal, security, or management functions at the Company, employees within the Company's Compliance Office, or technical staff at EthicsPoint. Those individuals may be located in the United States or in another country where the European Commission has not found that the privacy laws ensure the same level of protection of personal data as provided in the EU. In addition, all information you provide may be stored by the Company's Compliance Office in the course of answering your question(s) or investigating the report.



The Company will evaluate the information you provide, and may conduct appropriate investigations, and take corrective action.

Note that all individuals you identify through Integrity Helpline will in due course be informed about the fact that a report has been lodged. The information will not reveal your name or identity. In addition, all such individuals you identify will have the right to correct information reported by you.

Any information you submit that is not needed to answer your question or for the investigation of any incident will be deleted or archived if needed and as permitted by local law. In addition, once we have answered your question or any investigation is complete, all information submitted by you will be deleted or archived if needed and as permitted by local law. The Company will take adequate technical, organizational, and legal steps to secure the information you provide. It also requires EthicsPoint to adequately secure your personal data and not use it for any unauthorized purposes.

I have read the Privacy Notice