

Data Protection Statement to the Complaints Procedure under the German Act on Corporate Due Diligence Obligations in Supply Chains ("SCDDA") (*Lieferkettensorgfaltspflichtengesetz - LkSG*)

As at: **February 2024**

With this Data Protection Statement we, Leica Camera AG (hereinafter also referred to as "we" or "us") inform you about how we process your personal data once we have obtained them from you or a third person within the scope of a report in connection with the Complaints Procedure under the German Act on Corporate Due Diligence Obligations in Supply Chains (SCDDA) (hereinafter referred to as "**Complaints Procedure**").

1 Entity responsible and contact

1.1 Entity responsible

The entity responsible for data processing is, first of all,

Leica Camera AG

Am Leitz-Park 5
D-35578 Wetzlar

If you have any confidential questions, please contact:

Leica Camera AG

Personal/Confidential
Compliance Officer
Am Leitz-Park 5
D-35578 Wetzlar

E-mail address: compliance@leica-camera.com

The Complaints Procedure serves Leica Camera AG the purpose of receiving, examining and clarifying information and complaints that could indicate human rights and environmental risks and/or such (potential) breaches of duty that could have arisen as a result of the business activities of Leica Camera AG in its own business area or of a direct or indirect supplier (hereinafter "**Supplier**").

1.2 Safeguarding the rights of data subjects and questions

If you have any questions or suggestions regarding data protection, or if you wish to assert your rights according to Art. 15 et seq. GDPR, you are welcome to contact us using the contact details given here.

You may also address any questions regarding the Complaints Procedure to the Support of the systems operator, LegalTegrity, Platz der Einheit 2, 60323 Frankfurt am Main ("LegalTegrity") at support@legaltegrity.com via e-mail or by telephone at +49 69 9999 88 38. If you contact LegalTegrity with questions regarding the Complaints Procedure, LegalTegrity will process your personal data provided to them within the scope of your inquiry at its own responsibility. Please contact LegalTegrity if you wish to obtain further information about the Data Protection Statement of LegalTegrity.

In contrast, LegalTegrity processes personal data relating to information and complaints within the scope of the Complaints Procedure on behalf of Leica Camera AG (cf. clause 6).

Please note: If you have submitted your report anonymously, any subsequent contact regarding questions about the Complaints Procedure, data protection or the assertion of your rights may result in Leica Camera AG being able to associate your contact with your report and you will no longer be anonymous.

2 Data protection officer

You can reach the data protection officer at Leica Camera AG at DPO@leica-camera.com.

3 Subject matter of data protection

According to Art. 4 No. 1 General Data Protection Regulation (“**GDPR**“), personal data means any information relating to an identified or identifiable natural person. This can in particular be your name, but for example also any documented behaviour associated with your person. Personal data will hereinafter also be simply referred to as Data.

4 When are your personal data processed?

We provide two complaints channels for information and complaints within the scope of the Complaints Procedure.

- As a central complaints channel, you can use our digital [Complaints Procedure](#).
- Alternatively, it is possible to file reports by telephone via a hotline established for that purpose [from Germany: +49 800 3800 999 and from abroad: +49 69 99998839].

Further information on the Complaints Procedure is provided in our [Procedural Rules](#).

Your personal data will be processed within the scope of the Complaints Procedure

- when you access the website for the [Complaints Procedure](#),
- when you yourself provide information via our complaints channels or contact us via the contact data specified in clause 1.1 and provide your name, your e-mail address or any other information that can be used to establish a reference to your person, or
- when a reference to your person follows from or in connection with information provided by a third person. The latter may occur when you yourself are accused of misconduct or if your person is merely mentioned by the whistleblower in connection with the alleged misconduct of another person, e.g. because you are named as a witness of the misconduct.

5 Automated data collection

When accessing the website for the Complaints Procedure, your terminal automatically transfers the following data for technical reasons:

- Browser type and version

- operating system used
- referrer URL
- host name of the accessing computer
- time of the server request
- IP address

These data are merely processed for delivering the contents of the website for the Complaints Procedure and for providing the website functions. These data are not stored or combined with any other personal data you provide within the scope of a complaint via the website.

6 Operation of the Complaints Procedure and receipt of telephone messages

The Complaints Procedure, including the hotline, is provided by the service provider LegalTegrity GmbH, 60323 Frankfurt am Main ("**LegalTegrity**"). LegalTegrity processes personal data on behalf of Leica Camera AG by way of order data processing, i.e. exclusively according to the instructions of Leica Camera AG (cf. Art. 4 No. 8, 28 GDPR).

7 External ombudspersons for receipt and (first) analysis of the reports

Reports coming in via the complaints channels as well as the data and supplementary information contained therein which are provided by whistleblowers, if necessary on request, are directly received and analysed by BDO Legal Rechtsanwaltsgesellschaft mbH, Fuhrentwiete 12, 20355 Hamburg ("**BDO Legal**") for initial screening and assessment of incoming reports and for the purpose of further examination.

BDO Legal processes your personal data at its own responsibility so that Leica Camera AG is not responsible for BDO Legal's compliance with the data protection laws. Please contact BDO Legal if you wish to obtain further information on the processing of your personal data by BDO Legal or if you wish to receive the Data Protection Statement of BDO Legal.

After screening and first assessment, BDO Legal passes on reports on facts according to which a concrete violation of human rights and environmental obligations appears possible to Leica Camera AG for further clarification and processing.

8 Reports on the Complaints Procedure

8.1 Type of report

As whistleblower you can freely choose between the following two options of filing your report via the Complaints Procedure:

- a) Anonymous report

You can file the report anonymously. In that case, your identity is neither known to Leica Camera AG, the Suppliers possibly affected by the report, nor to BDO Legal.

Please note:

If you state your e-mail address at the end of the reporting process, or if you provide any information at another place in the reporting procedure which allow conclusions as to your person, your report will no longer be anonymous. Please also consider that conclusions about your person cannot only be drawn from your e-mail address and your name, but also in other ways. This can be possible, for example, when you can be considered as a witness to an incident, either due to your position in the respective company of the Leica Camera Group, your physical presence or a separate access authorisation.

b) Confidential report (not anonymous)

Regarding any other report, your personal data will be disclosed to BDO Legal and, unless you have requested confidentiality vis-à-vis third parties, subsequently also to the employees of the Compliance Office or the specialist departments at Leica Camera AG responsible for processing the report internally, in each case for the purpose of investigating and following up on the report, including the development and implementation of appropriate remedial measures to prevent, stop or minimize the extent of the violations.

8.2 Data for recording the incident

If you as whistleblower file a report via the complaints channels, we will collect the personal data you provide.

To the extent that information is obligatory, we will point that out to you in the entry mask, or orally in the case of a report via hotline.

Additionally, you may optionally provide supplementary information on the incident as well as documents relating to the incident. **In this context you can optionally delete or anonymize any information in the documents that can identify you personally, before you upload or transmit them.**

At the end of the procedure, you can state your e-mail address if you wish to be informed by BDO Legal or Leica Camera AG via e-mail about the receipt and the processing status of your report.

8.3 Access data for whistleblowers and additional information

After filing the report, you are shown a reference number. Furthermore, you have to provide a four-digit PIN. By means of the reference number and the PIN you have chosen you can at any time obtain information about the processing status of your report on the website for the Complaints Procedure, add further information to your report and, if necessary, respond to queries, e.g. via the chat function of the Complaints Procedure.

Please note that it is not possible to reset the access code or the PIN. If you have forgotten them, you need to create a new report.

8.4 Purposes of data processing

a) Receipt of the report regarding the Complaints Procedure

Given that Leica Camera AG is responsible for operating the Complaints Procedure, Leica Camera AG is also responsible under data protection law for receiving the report

regarding the Complaints Procedure. The initial screening and assessment of incoming reports, including the further investigation and development of suggestions, remedial measures for prevention, ending or minimization of the extent of the violations, however, are made by BDO Legal at their own responsibility.

b) Receipt of the report after initial analysis by BDO Legal

After the initial analysis, BDO Legal transmits the report, including the suggested remedial measures, to Leica Camera AG. Leica Camera AG correspondingly processes the personal data contained in the report to accept and further examine the report, and - in the case of reports relating to the business area of a Supplier - also the allocation of the report to that company.

c) Follow-up measures for reports regarding Leica Camera AG

Regarding reports relating to the business area of Leica Camera AG or its Suppliers, Leica Camera AG will furthermore process your personal data for the analysis and further investigation of the reported incidents and for deciding on the necessary remedial measures and their initiation.

d) Processing of your e-mail address and/or telephone number to keep you updated on your report

If you as whistleblower stated your e-mail address and/or telephone number, BDO Legal or Leica Camera AG will process your e-mail address and/or telephone number to inform you about the receipt of the report and the processing status, or for contacting you with regard to queries.

Leica Camera AG processes your personal data for implementing the Complaints Procedure to fulfil the legal obligations under Section 8 SCDDA and, correspondingly, for the receipt, analysis and clarification of information and complaints, the (potential) violation of human rights or environmental concerns according to the SCDDA, which might have arisen from the economic activities of Leica Camera AG within its own business segment or might have been caused by the Suppliers of Leica Camera AG.

8.5 Transfer of your personal data to BDO Legal

Within the further course of the investigations and in connection with the initiation of the necessary counteractions, Leica Camera AG will share additional information provided by whistleblowers and/or witnesses, if necessary on request, with BDO Legal for the purpose of further analysis.

8.6 Legal bases

a) Acceptance and further examination of the reports

Legal basis for the processing, including the transfer to BDO Legal of

- personal data of the whistleblowers and other persons (in particular accused persons or witnesses),
- as well as additional information which whistleblowers provided, if necessary on request

for acceptance and further examination of the reports is our legitimate interest according to Art. 6 (1) lit. f GDPR. Leica Camera AG has a legitimate and predominant interest in the establishment of a Complaints Procedure for compliance with the legal obligations arising from Section 8 SCDDA. Accordingly, there is also a legitimate and predominant interest in the receipt, analysis and clarification of information and complaints, the (potential) violation of human rights or environmental concerns according to the SCDDA, which might have arisen from the economic activities of Leica Camera AG within its own business segment or that of a Supplier.

- b) Follow-up measures for human rights or environmental crimes committed by employees of Leica Camera AG

Section 26 (1) sentence 2 German Federal Data Protection Act ("GFDP") is the legal basis for the processing of personal data of accused employees of Leica Camera AG, including the transfer to BDO Legal, for the detection of human rights or environmental crimes or severe breaches of duty in this context which relate to the employment relationship.

- c) Follow-up measures for other human rights or environmental violations by employees of Leica Camera AG or violations by other persons

The legal basis for the processing of personal data

- of the accused employees of Leica Camera AG
- of other accused persons
- of the whistleblowers and witnesses

(in each case including the transfer to BDO Legal) for the purpose of clarifying these violations and initiating remedial measures is our legitimate interest according to Art. 6 (1) lit. f GDPR.

Leica Camera AG has a legitimate and predominant interest in the establishment of a Complaints Procedure for compliance with the legal obligations arising from Section 8 SCDDA. Accordingly, there is also a legitimate and predominant interest in the receipt, analysis and clarification of information and complaints, the (potential) violation of human rights or environmental concerns according to the SCDDA, which might have arisen from the economic activities of Leica Camera AG within its own business segment or that of a Supplier. Likewise, there is a legitimate and predominant interest in the initiation of remedial measures to prevent, end or minimize the extent of the violations.

- d) Processing of your e-mail address and/or telephone number in connection with reports regarding the business segments of Leica Camera AG and the respective Suppliers

If you as whistleblower have stated your e-mail address and/or telephone number, Leica Camera AG will have a legitimate interest in the processing in order to inform you about the receipt of the report and the processing status and for contacting you in case of queries, Art. 6 (1) lit. f GDPR.

9 Abusive reports

9.1 Abusive reports relating to Leica Camera AG

If you as whistleblower file an abusive report, i.e. obviously false or untrue reports with regard to Leica Camera AG or its Suppliers, Leica Camera AG will process your personal data to initiate repressive steps against you, in particular employment law measures.

The legal basis for the processing of your personal data is Section 26 (1) sentence 2 GFDPA, if you are an employee of Leica Camera AG and the abusive report is to be seen as a severe breach of duty or a crime relating to the employment relationship. In other cases, the legal basis is our legitimate interest according to Art. 6 (1) lit. f GDPR. Leica Camera AG has a legitimate interest in pursuing abusive reports and in initiating corresponding measures.

10 Storage period

Leica Camera AG stores personal data in connection with the reports as well as supplementary information for a period of seven years, starting at the end of the year in which the investigation was completed and the report thus finally processed. If the report results in official or (pre-)court proceedings, the storage period starts upon the completion of the corresponding proceedings. The legal basis for the storage is Art. 6 (1) lit. c in conjunction with Section 10 (1) SCDDA. There is a legal obligation to store the relevant data.

Any storage exceeding the foregoing takes place only to the extent required for asserting, exercising or defending legal claims. This also constitutes the legal interest of Leica Camera AG, Art. 6 (1) lit. f GDPR.

11 Contact via our contact details

If you use the contact details provided under clause 1.1 for sending questions, e.g. on how the Complaints Procedure works or on data protection, to Leica Camera AG (via e-mail or letter mail), the following Data will be processed:

- your name - provided you stated it in your inquiry
- time and date of your inquiry as well as other information you provide in your inquiry

and, depending on the contact mode you chose or the contact data provided by you:

- your e-mail address, and/or
- your address.

The processing takes place on the basis of the legal interest of Leica Camera AG according to Art. 6 (1) lit. f GDPR. There is a legitimate interest in the effective processing of your inquiry.

Your inquiries are deleted as soon as they are no longer needed for the purpose for which they were collected. This is the case when your inquiry has been finally processed.

Please note: If you have submitted your report anonymously via the Complaints Procedure or the hotline, any subsequent contact regarding questions about the Complaints Procedure or

data protection may result in the fact that your contacting can be associated with your report and you will no longer be anonymous.

12 Cookies and similar technologies

Leica Camera AG uses so-called "cookies" on the website of the Complaints Procedure in order to be able to offer specific functions of the Complaints Procedure. Cookies are small data files stored on your terminal by means of your internet browser. We use Local Storage as a similar technology. In this context, data will be stored locally in the cache of your browser which continue to exist and can be read also after the browser window is closed or the program is ended - provided that you do not delete the cache (hereinafter jointly referred to as "cookies and similar technologies").

Leica Camera AG exclusively uses absolutely necessary cookies and similar technologies for the operation and functionality of the website of the Complaints Procedure. They help to make this website technically accessible and usable, and offer essential and fundamental functionalities, e.g. these cookies and similar technologies guarantee that the website for the Complaints Procedure is protected against attacks, they enable page navigation and the access to secure areas on the website.

Leica Camera AG uses absolutely required cookies without your approval, according to Section 25 (2) No. 2 of the German Act Regulating Data Protection and Privacy in Telecommunications and Telemedia. If personal data from these cookies are processed, such processing serves to ensure that the website of the Complaints Procedure and the functions relating thereto are usable, and to guarantee the website security. This also constitutes the legal interest of Leica Camera AG, Art. 6 (1) lit. f GDPR.

At the end of the day, personal data are deleted. An identification of the whistleblower based on these data is impossible. Moreover, the data are also not combined to identify the whistleblower.

To the extent that additional cookies or similar technologies are used, you have full control via the cookie consent manager on the website of the Complaints Procedure.

13 Provision of your Data

As whistleblower, you are neither by law nor by contract obliged to provide your personal data. Rather, you have the option of anonymously filing your report.

Please note:

If you state your e-mail address at the end of the reporting process, or if you provide any information at another place in the reporting procedure which allows conclusions as to your person, your report will no longer be anonymous. Please also consider that conclusions about your person cannot only be drawn from your e-mail address and your name, but also in other ways. This can be possible, for example, when you can be considered as a witness to an incident, either due to your position in the respective company of the Leica Camera Group, your physical presence or a separate access authorisation.

In individual cases, the removal of all information that allows conclusions as to your person can therefore result in the fact that an incident you report cannot be pursued or only to a limited extent. In that case you will be asked to provide further information within the scope of the Complaints Procedure. However, you are not obliged to do so.

Furthermore, whistleblowers or other users are neither by law nor by contract obliged to provide personal data, nor is the provision of this data necessary for a conclusion of a contract.

The provision of personal data, however, is necessary to a certain extent to provide you with the functions and contents of the Complaints Procedure and to receive and process inquiries. Without the provision of your personal data this is not possible, or only possible to a limited extent.

14 Origin of the data

If you as an accused person, witness or other third person are named in a report, or if conclusions as to your person arise from a report, Leica Camera AG will receive your personal data from the whistleblower or after the initial screening of the reports by BDO Legal. Likewise, BDO Legal transfers your personal data to Leica Camera AG if you are the whistleblower (cf. clause 8.4). Specifically, the following categories of personal data relating to you may be processed:

- Information about your person (including first and last name, position, employer)
- information on the (potential) human rights or environmental violation in context with which you are named as an involved person or as a witness (including the type, facts, date, company, place of the violation).
- Supplementary information that follows from the uploaded or transmitted documents.

Likewise, Leica Camera AG receives personal data from supplementary information and findings of BDO Legal that have emerged within the course of the investigation.

15 Transfer of your Data

Your Data will only be passed on beyond the scope described in this Data Protection Statement to the extent described below:

- a) In exceptional cases Leica Camera AG may be obliged to cooperate with authorities, in particular law enforcement authorities, tax authorities, regulatory supervisory authorities. The legal basis for the data processing relating thereto is Art. 6 (1) lit. c GDPR.
- b) In addition, Leica Camera AG passes on your Data to authorities (in particular law enforcement authorities, tax authorities, regulatory supervisory authorities), courts (within the course of [pre-]court proceedings), external advisors (e.g. lawyers) for the following purposes:
 - in the case of concrete indications of criminal acts for law enforcement, danger defence or legal prosecution;
 - for providing evidence and for the assertion, exercise or defence of claims.

The processing takes place on the basis of the aforementioned predominantly legitimate interests, Art. 6 (1) lit. f GDPR or our legal obligation, Art. 6 (1) lit. c GDPR.

In the case of criminal acts or severe breaches of duty by employees with regard to the employment relationship, the legal basis for passing on the personal data of the employees of Leica Camera AG by Leica Camera AG is Section 26 (1) sentence 2 German Federal Data Protection Act.

- c) Your personal data may also be passed on if Leica Camera AG is exposed to other third party claims which include the disclosure of your Data. In particular, this can be claims of data subjects in the context of exercising their rights according to chapter III GDPR. Disclosure allowing conclusions as to the identity of whistleblowers is made only after careful balancing of interests and to the extent that the interests of the whistleblower do not exceed the interests of the enquiring person.
- d) For processing the reports and all processes and investigations relating thereto, Leica Camera AG depends on contractually related third party enterprises and external service providers, so-called data processors (cf. Art. 4 No. 8, 28 GDPR). In such cases, personal data will be passed on to these data processors so that Leica Camera AG can obtain the services. These data processors process personal data only within the scope of the corresponding assignment and are strictly bound by instructions.

In addition to the data processor already mentioned in this Data Protection Statement, Leica Camera AG also uses the following categories of data processors:

- IT service providers
- cloud service providers
- software service providers

16 Third country transfers

To the extent that we also process personal data in so-called third countries or transmit them to recipients in third countries, we warrant that such transmission takes place only on the following conditions. Third countries are all countries outside of the European Economic Area (EEA). Please note that there is currently no adequacy decision of the EU Commission that these third countries generally provide a reasonable data protection level.

When we transmit personal data, we warrant that one of the following requirements is met:

- There is an adequacy decision of the EU Commission according to Art. 45 GDPR.
- We have concluded the standard data protection clauses approved by the EU Commission according to Art. 46 (2) lit. c GDPR and (if necessary) taken supplementary measures in compliance with the criteria of the European Court of Justice (judgment on Schrems II).
- There are other suitable guarantees within the meaning of Art. 46 (1) GDPR which are suited to establish a reasonable data protection level.
- There is an exemption regulation according to Art. 49 GDPR, e.g. when you have approved the transmission (Art. 49 (1) lit. a GDPR), the transmission is required on important grounds of public interest (Art. 49 (1) lit. d GDPR) or for the assertion, exercise or defence of legal claims (Art. 49 (1) lit. e GDPR).

You can request further information via the contact details provided in clause 1.1. There, you can also request information on the suitable guarantees taken for the protection of your personal data, including a copy of standard data protection clauses, if any.

17 Your rights

In specific circumstances, you have the rights described below in relation to the processing of your personal data. You can assert your rights by filing an application either by post or by e-mail to the contact details provided in clause 1.1 above.

Please note: If you have submitted your report anonymously via the Complaints Procedure or the hotline, a contact regarding the assertion of your rights may result in the fact that your contacting can be associated with your report and you will no longer be anonymous.

17.1 Right to information

You are entitled to obtain, at any time upon request, information on the personal data relating to you that are processed by Leica Camera AG, within the scope of Art. 15 GDPR.

17.2 Right to have inaccurate personal data corrected

You are entitled to request from us the correction without undue delay of the personal data relating to you, provided such data are incorrect.

17.3 The right to erasure

You are entitled according to Art. 17 GDP to request the erasure of the personal data relating to you.

17.4 The right to restriction of processing

You are entitled to request the restriction of the processing according to Art. 18 GDPR.

17.5 Right to object

Pursuant to Article 21 GDPR, you are entitled to object at any time, on grounds relating to your particular situation, to the processing of personal data relating to you, which is based, inter alia, on Art. 6 (1) lit. e or f GDPR. We will then no longer process your personal data, unless we can prove compelling legitimate reasons for the processing which prevail over your interests, rights and freedoms or if the processing serves to assert, exercise or defend against legal claims.

17.6 Right to lodge a complaint

In the case of complaints, you are entitled to contact any supervisory authority of your choice.

17.7 Data processing upon exercise of your rights

The personal data transmitted by you upon the exercise of your rights according to Art. 15 to 21 GDPR is processed for the purpose of implementing these rights and to be able to prove that and, if applicable, to defend legal positions. In this context, your Data will be stored for three years from complete fulfilment of your rights as a data subject.

Leica Camera AG is responsible for the processing for fulfilling your rights.

Such processing for the purpose of implementing and proving the implementation in accordance with the law is based on the legal basis of Art. 6 (1) lit. c GDPR in conjunction with Art. 15 to 21 GDPR, as it

is required for the compliance with our legal obligations. To the extent that personal data are processed for purposes of legal defence, this also constitutes the legitimate interest, Art. 6 (1) lit. f GDPR.

You are neither by contract nor by law obliged to provide your personal data; however, the fulfilment of your application for the safeguarding of your rights as a data subject according to Art. 12 (2) sentence 2 GDPR can be denied if you - if necessary on request - do not provide the data required for your clear identification.