

Privacy Notice for the Leica Camera Group Whistleblowing System

Dated: November 2024

In this Privacy Notice, we, Leica Camera AG (hereinafter also referred to as “we” or “us”), inform you how we and the subsidiaries of Leica Camera AG listed in **Annex 1** (hereinafter referred to as “subsidiaries” and together with us “Leica Camera Group”) process your personal data when Leica Camera AG or a subsidiary has acquired such data from you or a third party from a report made in conjunction with the [Whistleblowing System](#).

1 Data Controller and contact

The controller for data processing is initially:

Leica Camera AG

Am Leitz-Park 5
D-35578 Wetzlar

In case of confidential enquiries, please contact:

Leica Camera AG

Private/confidential
Compliance Officer
Am Leitz-Park 5
D-35578 Wetzlar

Email address: compliance@leica-camera.com

The purpose of the Leica Camera Group Whistleblowing System is to prevent and identify conduct at work by employees of the Leica Camera Group or other persons that is unlawful and/or harmful to the business. Leica Camera AG therefore works closely with the affected subsidiaries to identify and investigate the circumstances and to determine the required measures.

If you submit information on circumstances that affect not only Leica Camera AG but also subsidiaries or the Leica Camera Group, Leica Camera AG is responsible for certain processing operations together with the affected subsidiaries in accordance with Art. 26(1) Sentence 1 of the General Data Protection Regulation (“GDPR”). These processing operations are covered both in this Privacy Notice and in the agreement on joint responsibility, relevant excerpts of which the Leica Camera Group will be happy to provide. You can address your enquiry to the contacts named in **Section 1** here or – if regarding a subsidiary of the Leica Camera Group – to the contacts named in **Annex 1**.

Leica Camera AG is responsible for fulfilment of the information obligations in accordance with Art. 13 and 14 of the GDPR. If you have any questions or suggestions regarding data protection, or wish to assert your rights under Art. 15 et seq. GDPR, please use the contact details for the companies of the Leica Camera Group listed here and in **Annex 1**.

Questions on the Whistleblowing System and how it works can also be directed to the customer support of the Whistleblowing System operator, LegalTegrity, Platz der Einheit 2, 60323 Frankfurt am Main (“LegalTegrity”) via email at support@legaltegrity.com or by telephone on +49 69 9999 88 38. If you contact LegalTegrity regarding the Whistleblowing System and how it works, LegalTegrity will process your personal data that you provide to LegalTegrity in the context of your enquiry under its own responsibility. Please contact LegalTegrity if you would like to receive further information on the Privacy Notice of LegalTegrity.

By contrast, LegalTegrity processes personal data in the context of reports via the Whistleblowing System on behalf of Leica Camera AG (see **Section 6**).

Please note: If you submit your report via the Whistleblowing System anonymously, any subsequent contact regarding questions on the Whistleblowing System, data protection or the assertion of your rights could enable Leica Camera AG and/or any subsidiary contacted by you or involved in the processing to link your contact with your report and lead to you no longer being anonymous.

2 Data Protection Officer

You can contact the Data Protection Officer of Leica Camera AG at DPO@leica-camera.com. Where any subsidiaries have appointed a Data Protection Officer, you will find the contact details in **Annex 1**.

3 Subject of data protection

In accordance with Art. 4(1) GDPR, personal data means all information that relates to an identified or identifiable natural person. This may be, in particular, their name, or, for example, documented conduct that is connected with their person. Personal data is also referred to below simply as data.

4 When is your personal data processed?

Your personal data is processed in the context of the Whistleblowing System in the following cases:

- When you access the Whistleblowing System website
- When you make a report yourself or contact the Leica Camera Group using the contact details provided in **Section 1** or **Annex 1** and provide your name, email address or other information that can be linked to your person
- When a link to your person results from or is made in conjunction with a report from a third party. The latter may happen if you yourself are accused of misconduct or you are mentioned by the whistleblower solely in conjunction with the alleged misconduct of another person, for example because you are named as a witness to the misconduct.

5 Automatic data collection

When you access the Whistleblowing System website, your end device automatically transfers the following data for technical reasons:

- Browser type and browser version
- Operating system used

- Referrer URL
- Host name of the computer accessing the website
- Time of server request
- IP address

This data is only used to deliver the content of the Whistleblowing System and to provide the functions of the Whistleblowing System. This data is not saved or combined with other personal data that you transfer in the context of a report via our Whistleblowing System.

The processing is required for the aforementioned purposes. This is also our legitimate interest pursuant to Art. 6(1)(f)GDPR.

6 How the Whistleblowing System and the Whistleblowing System hotline work

The Whistleblowing System and the hotline provided on the Whistleblowing System website (“Whistleblowing System hotline”) are provided by the service provider LegalTegrity GmbH, Platz der Einheit 2, 60323 Frankfurt am Main (“LegalTegrity”). LegalTegrity processes personal data on behalf of Leica Camera AG, i.e. exclusively on the instructions of Leica Camera AG (under Art. 4(8) and 28 GDPR).

7 Receipt and initial assessment of reports by BDO Legal

Reports made and the data they contain, as well as supplementary information that whistleblowers may provide on request, are collected via the Whistleblowing System – or in the case of telephone reporting via the Whistleblowing System hotline or via the hotline set up by BDO Legal Rechtsanwaltsgesellschaft mbH (“BDO hotline”) – directly by BDO Legal Rechtsanwaltsgesellschaft mbH, Fuhlentwiete 12, 20355 Hamburg (“BDO Legal”) for the initial viewing and initial assessment of reports made and for the purpose of further investigation and resolution (e.g. proposals for follow-up measures).

BDO Legal processes your personal data under its own responsibility; Leica Camera Gruppe is therefore not responsible for adherence to data protection laws by BDO Legal. Please contact BDO Legal if you would like to receive further information on the processing of your data by BDO Legal.

Following viewing and initial assessment, BDO Legal will pass on to Leica Camera AG reports that relate to circumstances that affect Leica Camera AG or that could have an impact on Leica Camera AG and/or the Leica Camera Group. In contrast, BDO Legal will pass reports that exclusively affect a subsidiary on to the respective affected subsidiary.

Where a report concerns persons at the subsidiaries who are internally authorised to receive reports, the report is passed on to Leica Camera AG.

8 Reports via the Whistleblowing System submission form or hotlines

8.1 Type of report

Regardless of how you submit your report, you as the whistleblower can choose whether to disclose your identity as the whistleblower with the report (“confidential report”) or you wish to remain anonymous (“anonymous report”).

a) Anonymous report

You can submit a report anonymously. In this case, your identity is not known to Leica Camera AG, the subsidiaries that might be affected by the report, or BDO Legal.

Please note:

If you provide your email address at the end of the reporting process when submitting a report via the Whistleblowing System submission form, or where you contact the hotlines from a telephone number that can be traced back to you (e.g. a non-withheld number) when reporting by telephone, or where you provide information that allows conclusions to be drawn about you at another point in the reporting process, your report is no longer anonymous. When doing so, remember that conclusions can be drawn about you not only via your email address or telephone number and name, but also based on other information, in particular the content of the report.

When submitting a telephone report via the BDO hotline, you also have the option of disclosing your identity only to BDO Legal. In this case, BDO Legal will pass on your report to Leica Camera AG or the subsidiary affected only in anonymised form. Where your personal data is also documented in the Whistleblowing System, the companies of the Leica Camera Group cannot access this information in the case of an anonymous report.

b) Confidential report (not anonymous)

When you make a confidential report, your personal data is disclosed both to BDO Legal and to the employees of Leica Camera AG responsible internally for processing the report and, if the report relates to a subsidiary, to the employees responsible there, in each case for the purpose of further investigating and processing the report.

c) Reports outside the scope of the EU Whistleblowing Directive

Whistleblowers can use the Whistleblowing System and the hotlines to submit reports of circumstances that do not fall under the scope of the EU Whistleblowing Directive and the national implementation laws applicable to the respective subsidiaries. Reports that are submitted anonymously, regardless of the type of breach reported, and confidential reports on breaches of the Code of Conduct (Verhaltenskodex), the German Anti-Corruption Directive (Richtlinie zur Korruptionsprävention), the Anti-Trust Directive (Kartellrechtsrichtlinie), the Anti-Discrimination Directive (Anti-Diskriminierungsrichtlinie) and the Anti-Harassment Directive (Anti-Belästigungsrichtlinie), do not fall within scope. Reports relating to subsidiaries that are not obligated to provide a Whistleblowing System are also outside the scope of the EU Whistleblowing Directive and its national implementation laws.¹ When submitting a report via BDO Legal, whistleblowers are informed if their report does not fall within the scope of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz).

¹ The following companies in the Leica Camera Group are obligated to provide a Whistleblowing System: Leica Camera AG, Leica Camera Deutschland GmbH and Leica - Aparelhos Ópticos de Precisão S.A.

8.2 Reports via the Whistleblowing System submission form and the hotlines

You, the whistleblower, can decide whether to submit your report via the Whistleblowing System submission form or by telephone via the hotlines we have set up for the Leica Camera Group, the Whistleblowing System hotline, or the BDO hotline. LegalTegrity receives telephone reports via the Whistleblowing System hotline on behalf and on the instruction (under Art. 4(8) and 28 GDPR) of Leica Camera AG, transcribes them and forwards them to BDO Legal via the Whistleblowing System. By contrast, telephone reports received via the BDO hotline are received, transcribed and forwarded into the Whistleblowing System by BDO Legal under its own responsibility.

a) Data for submitting the incident

When you submit a report via the Whistleblowing System or the hotlines as a whistleblower, please provide the following information:

- Category of incident being reported
- Country and, if applicable, Leica Group company to which the report relates
- Description of the incident being reported
- Location of incident
- Date and time of incident
- Name and position of the persons involved
- Name and position of potential witnesses
- Your relationship to the Leica Camera Group

Mandatory fields will be marked. If you have selected that you wish to submit a confidential report, you must also provide your full name. You also have the option of providing the following information:

- Your country
- Your job title
- Your telephone number
- Your email address.

Your telephone number will also be recorded if you submit your report by telephone via the hotline and do not withhold your number when you call. If you do not withhold your telephone number, but still want to submit your report anonymously, your telephone number will not be saved.

In addition, you have the option of providing additional information and uploading documents on the incident to the Whistleblowing System. **You have the option of removing information that could identify you personally from the documents in advance or anonymising such information.**

At the end of the process, you may enter your email address if you wish Leica Camera AG to inform you of the status of your report by email.

b) Access data for whistleblowers and additional information

Once you have submitted the report via the Whistleblowing System, you will see a reference number. You also need to enter a four-digit PIN. You can use the reference number and the PIN you have chosen at any time to find out the status of your report in the Whistleblowing System, to add further information on your report, or to respond to queries, for example using the Whistleblowing System chat function, if applicable. If you have submitted your report via the Whistleblowing System or BDO hotline, the person you speak to will give you a reference number and an access code generated by the Whistleblowing System.

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

8.3 Responsibility under data protection law and purposes of data processing

Unless otherwise described below, the following applies:

For the processing of personal data in conjunction with:

- reports that affect Leica Camera AG, Leica Camera AG is responsible.
- reports that exclusively affect a subsidiary, the subsidiary affected is responsible.
- reports that affect a subsidiary but may also affect Leica Camera AG and/or the Leica Camera Group, Leica Camera AG is responsible together with the subsidiaries affected.

a) Receipt of the report via the Whistleblowing System and the Whistleblowing System hotline

Because Leica Camera AG is responsible for operating the Whistleblowing System, Leica Camera AG also bears responsibility under data protection law for receiving the report via the Whistleblowing System.

However, BDO Legal conducts the initial viewing and assessment of reports made, including further investigation and development of solutions (e.g. proposals for follow-up measures), and forwarding of the report to the affected companies in the Leica Camera Group, under its own responsibility. Leica Camera AG and the subsidiaries will only be able to access the reports once they have been forwarded.

b) Receipt of the report following initial assessment by BDO Legal

Following initial examination, BDO Legal forwards the report, including an initial assessment, to the companies in the Leica Camera Group affected in each case. These process the personal data contained in the report accordingly in order to receive and further examine the report.

c) Follow-up measures for reports

The companies of the Leica Camera Group affected in each case also process your personal data in order to assess and further investigate the reported incidents and to decide on the required counter-measures and their initiation.

d) Joint processing of reports

In the case of reports that also affect a subsidiary and/or the Leica Camera Group, Leica Camera AG and the subsidiaries affected in each case process your personal data in order to assess the report (including a recommendation for how to proceed). This will involve the relevant information being exchanged between the affected subsidiaries and Leica Camera AG. In addition, the data is processed for the purpose of further investigating the reported incidents together and deciding on the required counter-measures and their initiation.

e) Processing your contact details

If you, the whistleblower, have provided your contact details (email address and/or telephone number) and disclosed them to the affected companies in the Leica Camera Group, these companies in the Leica Camera Group will process your data in order to inform you of the status of your report or to contact you for any queries.

The purpose of processing your personal data is to prevent and identify conduct at work by employees of the affected companies of the Leica Camera Group or other persons that is unlawful and/or harmful to the business.

8.4 Disclosure of your personal data

a) Disclosure of your personal data to BDO Legal

As the investigations progress and in conjunction with the initiation of the required counter-measures, the affected companies in the Leica Camera Group may share supplementary information provided by whistleblowers, witnesses or accused persons with BDO Legal on request for the purpose of further investigation.

b) Disclosure to competent authorities as part of follow-up measures

Where necessary for follow-up measures, the affected companies of the Leica Camera Group forward reports and the data collected in the assessment process to the competent authorities (in particular law enforcement authorities, tax authorities and regulatory supervisory authorities).

The purpose of processing your personal data is to prevent and identify conduct at work by employees of the affected companies of the Leica Camera Group or other persons that is unlawful and/or harmful to the business.

8.5 Lawful basis

a) Lawful basis for processing in conjunction with reports on circumstances **within the scope of the EU Whistleblowing Directive**

- aa) Processing by **Leica Camera AG** and the **German subsidiaries** of the Leica Camera Group

For reports that fall under the scope of the EU Whistleblowing Directive and the German implementation law (German Whistleblower Protection Act – **HinSchG**) (for differentiation, see **Section 8.1.c**), the lawful basis for the processing of personal data of the whistleblowers and other persons (in particular accused persons or witnesses) is Art. 6(1)(c) GDPR in conjunction with Section 10 HinSchG in conjunction with Sections 17 and 18 HinSchG.

Where the content of the report also contains data in terms of Art. 9 and 10 GDPR (e.g. reports on assault, harassment or verbal abuse), processing is justified in accordance with Art. 6(1)(c), 9(2)(g) or 10 Sentence 1 GDPR in conjunction with Section 10 HinSchG in conjunction with Sections 17 and 18 HinSchG.

The affected companies in the Leica Camera Group are legally obligated to process the data.

- bb) Processing by the other subsidiaries

For reports on circumstances that fall under the scope of the EU Whistleblowing Directive and its national implementation laws that apply to the respective subsidiaries, see **Annex 1** for the lawful basis for processing for the purposes named in **Sections 8.3** and **8.4**.

The affected companies are legally obligated to process the data.

- cc) Processing on the basis of your consent

Where consent is required for the transfer or disclosure of your personal data related to you as a whistleblower for the aforementioned purposes, we will contact you before transfer and ask for corresponding consent (Art. 6(1)(a) or 6(1)(a) GDPR, Art. 9(2)(a) GDPR for the processing of data under Art. 9 or 10 GDPR). The data is only transferred or disclosed if you have granted your consent.

You can withdraw your consent at any time, for example using the contact details provided in **Section 1** and **Annex 1**. The withdrawal of consent does not affect the lawfulness of the processing conducted on the basis of consent up to the point of withdrawal. We will provide further information on the processing of your data, and on your right of withdrawal and how you can exercise it when we obtain your consent.

- b) Reports **outside the scope of the EU Whistleblowing Directive**

For reports that do not fall within the scope of the EU Whistleblowing Directive and its national implementation laws that apply to the respective subsidiaries (for differentiation, see **Section 8.1.c**), the lawful basis for the processing is the legitimate interest in accordance with Art. 6(1)(f) GDPR. The companies of the Leica Camera Group affected in each case have a legitimate and overriding interest in receiving and assessing reports intended to prevent or identify that is unlawful and/or harmful to business in relation to Leica Camera AG, its subsidiaries and the Leica Camera Group. In the case of reports

that relate to a subsidiary and also affect Leica Camera AG / the Leica Camera Group, the affected companies in the Leica Camera Group also pursue the same interests of the respective subsidiaries or of the Leica Camera Group.

Where the content of the report also contains data in terms of Art. 9 or 10 GDPR (e.g. reports on assault, harassment or verbal abuse), processing is justified in accordance with Art. 6(1)(f), 9(2)(f) or 10 Sentence 1 GDPR. The processing is required in order to assert, exercise or defend against legal claims and for the aforementioned legitimate interests.

c) Processing of employee data

Where the processing is required in order to uncover criminal offences or serious breaches of duty by employees of Leica Camera AG or the respective subsidiary, the lawful basis for processing by Leica Camera AG or the respective subsidiary as an employer in Germany is Art. 88(1) GDPR in conjunction with Section 26(1) Sentence 2 of the German Federal Data Protection Act (BDSG) and otherwise Art. 6(1)(f) GDPR. The legitimate interests pursued lie in the aforementioned purposes.

Where a different lawful basis applies for the subsidiaries, please see [Annex 1](#).

9 False reports

If you as the whistleblower make a false report, i.e. a clearly incorrect or untrue report, the affected company shall process your personal data in order to initiate action against you, in particular measures under labour law.

The lawful basis for the processing of your personal data by Leica Camera AG or the respective subsidiary as an employer in Germany is Art. 88(1) GDPR in conjunction with Section 26(1) Sentence 2 BDSG, insofar as you are an employee of the affected company in the Leica Camera Group and the false report can be considered a serious breach of duty or criminal offence in relation to the employment relationship.

In other cases, the lawful basis is the legitimate interest in accordance with Art. 6(1)(f) GDPR. The affected company has a legitimate interest in taking action against false reports and initiating corresponding measures.

Where a different lawful basis applies for the subsidiaries, please see [Annex 1](#).

In the case of false reports that affect both Leica Camera AG and subsidiaries of the Leica Camera Group, Leica Camera AG and the subsidiaries affected in each case are jointly responsible for processing.

10 Retention period

Reports and supplementary information are retained by the processing company acting for the Leica Camera Group for a period of three years, starting from the time when the outcome of the investigation was communicated to the whistleblower, in addition to a two-month archiving period, if applicable. Where the report results in official or judicial and prejudicial proceedings, the retention period begins upon conclusion of the corresponding proceedings. The lawful basis for retention is Art. 6(1)(c) GDPR in

conjunction with the respective national implementation law for the EU Whistleblowing Directive. In Germany, this is Section 11(5) of the German Whistleblower Protection Act (HinSchG). Where a different lawful basis applies for the subsidiaries, please see **Annex 1**. The retention period is a legal obligation. Data is only retained beyond this, or by the subsidiaries that are not obligated under the EU Whistleblowing Directive and the respective national implementation law, where this is required in order to fulfil legal provisions under Art. 6(1)(c) GDPR or to assert, exercise or defend against legal claims. This is also the legitimate interest of Leica Camera AG or the affected subsidiary under Art. 6(1)(f) GDPR.

Please see **Annex 1** for any differing retention periods of the subsidiaries of Leica Camera AG outside Germany.

11 Contact using our contact details

If you send an enquiry (by email or post) to the Leica Camera Group using the contact details provided in **Section 1**, e.g. with questions on data protection or how the Whistleblowing System works, the following data is processed:

- Your name, if you provide it with your enquiry
- The time and date of your enquiry and the other information that you provide in your enquiry.

Depending on the way you choose to contact us and the contact details you provide:

- Your email address and/or
- Your postal address.

Processing is on the basis of the legitimate interest of Leica Camera AG or the corresponding subsidiaries in accordance with Art. 6(1)(f) GDPR. There is a legitimate interest in the effective processing of your enquiry. The Leica Camera Group company you contacted is responsible for this processing.

Your enquiries are erased as soon as they are no longer needed for the purpose for which they were collected. This is the case once the corresponding Leica Camera Group company has completed processing of your enquiry.

Please note: If you have submitted your report via the Whistleblowing System anonymously, any subsequent contact regarding questions on the Whistleblowing System or data protection could result in your contact being linked with your report and you no longer being anonymous.

12 Cookies and similar technologies

On the Whistleblowing System website, Leica Camera AG uses cookies to allow it to offer certain functions of the Whistleblowing System. Cookies are small files saved on your end device via your internet browser. We also use local storage as a similar technology. Data is saved locally in your browser's cache. This data remains and can still be read even when you close the browser window or the program – unless you clear the cache (hereinafter referred to collectively as “cookies and similar technologies”).

Leica Camera AG uses essential cookies and similar technologies exclusively for the operation and function of the Whistleblowing System website. These help to make the website technically accessible and usable and to offer basic key functions. For example, these cookies and similar technologies ensure

that the Whistleblowing System website is protected against attacks and enable page navigation and access to secure areas of the website.

Leica Camera AG uses essential cookies without your consent in accordance with Section 25(2)(2) of the German Telecommunications Digital Services Data Protection Act (“TDDDG”). Where personal data from these cookies is processed, this processing occurs in order to ensure that the Whistleblowing System website and the associated functions can be used and to ensure the security of the website. This is also the legitimate interest of Leica Camera AG, Art. 6(1)(f) GDPR.

Personal data is deleted at the end of the day. It is not possible to identify the whistleblower from this data, nor is the data combined in order to identify the whistleblower.

13 Provision of your data

As a whistleblower, you are not legally or contractually obligated to provide your personal data. On the contrary, you have the option of submitting your report anonymously.

Please note:

Your report is no longer anonymous if you provide your email address at the end of the reporting process when submitting a report via the Whistleblowing System submission form, or when you contact the hotlines from a telephone number that can be traced back to you (e.g. a non-withheld number) when reporting by telephone, or when you provide information that allows conclusions to be drawn about you at another point in the reporting process. When doing so, remember that conclusions can be drawn about you not only via your email address or telephone number and name, but also based on other information, in particular the content of the report.

In individual cases, removing all information that allows conclusions to be drawn about you can mean that the incident you have reported cannot be pursued, or only to a limited extent. In this case, you will be asked via the Whistleblowing System to provide further information. However, you are not obligated to fulfil this request.

Whistleblowers and other users are also not legally or contractually obligated to provide personal data, nor is the provision of this data required for contract conclusion.

However, the provision of the personal data to a certain extent is required in order to provide you with the functions and content of the Whistleblowing System and to allow enquiries to be received and processed. 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 are named in a report as the accused, a witness or another third party, or if conclusions about you result from a report, Leica Camera AG or the affected subsidiary will receive your personal data from the whistleblower or, following initial assessment of the reports, from BDO Legal. Equally, BDO Legal will transfer your personal data to Leica Camera AG if you are the whistleblower (see **Section 8.3**). You can find the categories of personal data about you that are processed in **Section 8.2**.

In the case of reports that affect both Leica Camera AG and a subsidiary or Leica Camera AG, the affected companies of the Leica Camera Group will receive:

- the aforementioned personal data on the whistleblowers, accused, witnesses and other third parties
- relevant supplementary information and findings that arise during the investigation

including through exchange of the relevant information between the affected companies in the Leica Camera Group and from BDO Legal.

15 Disclosure of your data

Your data will be disclosed beyond that described in this Privacy Notice only to the following extent:

- d) Leica Camera AG and/or the affected subsidiaries will pass your data on to courts (as part of judicial and prejudicial proceedings), and external consultants (e.g. lawyers) for the following purposes:
- in the case of specific indications of criminal offences for prosecution or averting danger;
 - for evidence and in order to assert, exercise or defend against claims;

Processing is on the basis of the aforementioned overriding legitimate interests, in accordance with Art. 6(1)(f) GDPR, or a legal obligation, in accordance with Art. 6(1)(c) GDPR.

In the case of criminal offences or serious breaches of duty by employees in relation to the employment relationship, the lawful basis for the transfer of the personal data of the employees of the Leica Camera Group companies is, in the case of Leica Camera AG and the German subsidiaries, Art. 88(1) GDPR in conjunction with Section 26(1) Sentence 2 BDSG. Otherwise, the lawful basis is Art. 6(1)(f) GDPR. The processing is required in order to pursue the aforementioned legitimate interests.

Where a different lawful basis applies for the subsidiaries, please see [Annex 1](#).

- e) Your personal data may also be disclosed if Leica Camera AG or the affected subsidiaries are subjected to third-party claims that include access to your data. This may be, in particular, claims by data subjects as part of the exercise of their rights under Chapter III of the GDPR.

Furthermore, personal data will be shared if you assert your data subject rights against Leica Camera AG and/or the subsidiaries, and these are jointly responsible for processing your personal data. This is necessary in order for Leica Camera AG and the subsidiaries to be able to exercise their rights in full. The lawful basis for processing in order to fulfil your legal obligation is Art. 6(1)(c) GDPR in conjunction with Art. 15 to 21 GDPR.

- f) Leica Camera AG and the affected subsidiaries rely on contractually bound external companies and service providers, known as processors (see Art. 4(8) and 28 GDPR) to process the reports and for the associated processes and investigations. In such cases, personal data is disclosed to these processors. These processors process personal

data only within the scope of the corresponding order and are strictly bound by instruction.

In addition to the processors already named in this Privacy Notice, Leica Camera AG and the affected subsidiaries also use the following categories of processor:

- IT service providers
- Cloud service providers
- Software service providers

16 Third country transfers

Where reports that affect Leica Camera AG and/or a European subsidiary also affect a non-European subsidiary at the same time, personal data may be transferred to the respective subsidiary based in a third country.

In this case, we guarantee that one of the following requirements is met:

- There is an adequacy decision by the EU Commission in accordance with Art. 45 GDPR, stating that there is an appropriate level of data protection in the third country. Specifically, we transfer personal data based on an adequacy decision of the EU Commission to the following companies in the Leica Camera Group:
 - Leica Camera AG (Switzerland)
 - Leica Camera Japan Co., Ltd. (Japan)
 - Leica Camera Ltd. (United Kingdom)
- Furthermore, we have concluded the standard data protection clauses approved by the EU Commission in accordance with Art. 46(2)(c) GDPR and taken supplementary measures in line with the criteria of the European Court of Justice (Schrems II judgment).
- Transfer to a third country may also occur if the subject of the report is a matter that requires cooperation with authorities in the affected third country. In this case, personal data is transferred on the basis of your consent (Art. 49(1)(a) GDPR) or where this is required for the assertion of, exercise of or defence against legal claims (Art. 49(1)(e) GDPR).

You can request further information using the contact details provided in **Section 1** or in **Annex 1**. There you can also request information on the suitable safeguards that we have provided in order to protect your personal data, including a copy of any standard data protection clauses concluded, if applicable.

17 Your rights

Under certain circumstances, you are entitled to the rights described below in relation to the processing of your personal data. You can assert your rights by submitting a request by post or email using the addresses provided in **Section 1** above or in **Annex 1**.

Please note: If you have submitted your report via the Whistleblowing System anonymously, any subsequent contact in order to assert your rights could result in your contact being linked with your report and you no longer being anonymous.

17.1 Right of access

You have the right at any time to request access to your personal data processed by Leica Camera AG and/or its subsidiaries within the scope of Art. 15 GDPR.

17.2 Right to rectification of incorrect data

You have the right to demand that we immediately rectify incorrect personal data relating to you.

17.3 Right to erasure

In accordance with Art. 17 GDPR, you have the right to demand the erasure of the personal data relating to you.

17.4 Right to restrict processing

You have the right to demand the restriction of processing in accordance with Art. 18 GPDR.

17.5 Right to object

You have the right, for reasons resulting from your particular situation, to object in accordance with Art. 21 GDPR at any time to the processing of personal data relating to you, for example based on Art. 6(1)(e) or (f) GDPR. The processing of your personal data will then cease, unless we can prove compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing serves the assertion of, exercise of or defence against legal claims.

17.6 Right to data portability

You have the right to receive your personal data which you have provided to us; we will provide this in a structured, common, machine-readable format in accordance with Art. 20 GDPR.

17.7 Right of appeal

You have the right to contact a supervisory authority of your choice in the case of complaints.

17.8 Data processing in the exercise of your rights

The personal data transferred by you when exercising your rights under Art. 15 to 21 GDPR is processed for the purpose of exercising these rights and to enable proof of this to be provided and, if applicable, to

defend legal positions. In this context, your data will be retained for three years following complete fulfilment of your data subject rights.

Leica Camera AG together with the subsidiaries is responsible for processing data to fulfil your rights, where the data is processed under joint responsibility.

The lawful basis for processing for the purpose of implementation and proof of legally compliant implementation is Art. 6(1)(c) GDPR in conjunction with Art. 15 to 21 GDPR, as it is required in order to fulfil our legal obligation. Where the personal data is processed for purposes of legal defence, this is also the legitimate interest under Art. 6(1)(f) GDPR.

You are neither contractually nor legally obligated to provide your personal data. However, fulfilment of your request for the exercise of your data subject rights in accordance with Art. 12(2) Sentence 2 and (6) GDPR can be refused if you, on request if applicable, do not provide the data required to identify you uniquely.

Annex 1

Name/contact details of the subsidiary/Data Protection Officer (if applicable)	Processing operation	Lawful basis
<p>Leica - Aparelhos Ópticos de Precisão S.A.</p> <p>Rua da Leica 55, 4760-810 Lousado, Vila Nova de Famalicão Portugal</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: vitor.freitas@leica-camera.com</p>	<p>Processing of personal data of the whistleblowers and other persons (in particular other accused persons or witnesses), including saving of data (see <u>Section 8.3, 8.4 and 10</u>)</p>	<p><u>For the processing of personal data:</u></p> <p>Art. 6(1)(c) GDPR in conjunction with law no. 93/2021 of 20 December 2021 (Regime Geral de Proteção de Denunciantes de Infrações).</p> <p><u>For the processing of data under Art. 9 and 10 GDPR:</u></p> <p>Art. 6(1)(c), Art. 9(2)(f) and Art. 10 Sentence 1 GDPR in conjunction with law no. 93/2021 of 20 December 2021 (Regime Geral de Proteção de Denunciantes de Infrações)</p>
	<p>Processing of personal data of accused employees of the subsidiary in the case of criminal offences or serious breaches of duty in relation to the employment relationship in conjunction with the aforementioned processing operations and false claims.</p>	<p><u>For the processing of personal data:</u></p> <p>Art. 6(1)(c) GDPR in conjunction with law no. 93/2021 of 20 December 2021 (Regime Geral de Proteção de Denunciantes de Infrações).</p> <p><u>For the processing of data under Art. 9 and 10 GDPR:</u></p> <p>Art. 6(1)(c), Art. 9(2)(f) and Art. 10 Sentence 1 GDPR in conjunction with law no. 93/2021 of 20 December 2021 (Regime Geral de Proteção de Denunciantes de Infrações)</p> <p>For false claims, the provision for the legitimate interests pursued as in <u>Section 9</u> applies correspondingly.</p>

<p>Leica Camera Comercial, Unipessoal, LDA</p> <p>Rua de Sá Bandeira 48/52, 4000-427 Porto Portugal</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: Paulo.Silveira@leica-camera.com</p>	<p>See Privacy Notice</p>
<p>Leica Camera SARL</p> <p>134 Rue du Faubourg Saint-Honoré, 75008 Paris France</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: thomas.ribault@leica-camera.com</p>	<p>See Privacy Notice</p>
<p>Leica Camera Italia S.r.l.</p> <p>Via Mengoni 4, 20121 Milano Italy</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: Vanessa.Bernocchi@leica-camera.com</p>	<p>See Privacy Notice</p>

<p>Leica Smart Projection GmbH</p> <p>Am Leitz-Park 5, 35578 Wetzlar Germany</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: stephan.albrecht@leica-camera.com</p>	<p>See Privacy Notice</p>
<p>LFI - Photographie GmbH</p> <p>Burchardstraße 14, 20095 Hamburg Germany</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: compliance@lfi-online.de</p>	<p>See Privacy Notice</p>
<p>Leica Camera Austria GmbH</p> <p>Annagasse 5, 1010 Vienna, Austria</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: johannes.dietrich@leica-camera.com</p>	<p>See Privacy Notice</p>

<p>Leica Camera Deutschland GmbH</p> <p>Am Leitz-Park 5, 35578 Wetzlar Germany</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: nadine.zech@leica-camera.com</p> <p>Contact details of the Data Protection Officer: dpo@leica-camera.com</p>	<p>See Privacy Notice</p>
<p>Leica Camera Iberia S.L.</p> <p>Calle de José Ortega y Gasset nº34, 28006, Madrid Spain</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: compliance.es@leica-camera.com</p>	<p>See Privacy Notice</p>
<p>Leitz-Park Marketing GmbH</p> <p>Am Leitz-Park 6, 35578 Wetzlar Germany</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: geraldine.pfeffer@leica-camera.com</p>	<p>See Privacy Notice</p>

<p>Leica Eyecare GmbH</p> <p>Am Leitz-Park 5, 35578 Wetzlar Germany</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: compliance@leica-eyecare.com</p>	<p>See Privacy Notice</p>
<p>Leica Camera Classics GmbH</p> <p>Westbahnstraße 40 1070 Vienna Austria</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: Alexander.Sedlak@leica-camera.com</p>	<p>See Privacy Notice</p>
<p>Leica Camera Ltd.</p> <p>6-8 James Street Marylebone, London, W1U 1ED United Kingdom</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: tatiana.devyaterikova@leica-camera.com</p>	<p><u>Within the scope of the UK GDPR, the following applies:</u></p> <p>All references to the GDPR are considered references to the UK GDPR.</p>

<p>Ernst Leitz Werkstätten GmbH</p> <p>Am Leitz-Park 4, 35578 Wetzlar Germany</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: henrik.ekdahl@ernst-leitz-werk- staetten.com</p>	<p>See Privacy Notice</p>
<p>Ernst Leitz Mobile GmbH</p> <p>Am Leitz-Park 5, 35578 Wetzlar Germany</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: marius.eschweiler@leica-camera.com</p>	<p>See Privacy Notice</p>
<p>Leica Camera Eu GmbH</p> <p>Am Leitz-Park 5, 35578 Wetzlar Germany</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: kurt.doyran@leica-camera.com</p>	<p>See Privacy Notice</p>

<p>Fjorden B.V.</p> <p>Fagelstraat 61-3, 1052 EZ Amsterdam Netherlands</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: victor.henning@leica-camera.com</p>	<p>See Privacy Notice</p>
<p>Fjorden Electra AS</p> <p>Blåbærstien 39c, 1456 Nesoddtangen Norway</p> <p>Private/confidential Local Compliance Representative</p> <p>Email address: victor.henning@leica-camera.com</p>	<p>See Privacy Notice</p>