

Notes on data protection in the Rahn Education whistleblower system

In the following, we would like to inform you about the collection, processing and use of personal data within the framework of the whistleblower system if you submit a report by e-mail, telephone call, letter or personal appearance to the whistleblowing officer of the companies of the Rahn Group (hereinafter "Rahn Education"). Therefore, please read this data protection information very carefully before submitting a report.

I. Purpose of the whistleblower system and data processing

The purpose of the whistleblower system is to receive and process reports of (suspected) violations of the law or serious internal violations of rules against Rahn Education and its affiliated companies, business partners and subcontractors in a secure and confidential manner.

The processing of personal data within the framework of the whistleblower system is based on the legitimate interest of Rahn Education in the detection and prevention of wrongdoing and the associated prevention of damage and liability risks for Rahn Education (Art. 6 para. 1 lit. f GDPR in conjunction with Sections 30, 130 OWiG). In addition, the German Whistleblower Protection Act (HinSchG) and the German Corporate Governance Code in Section 4.1.3. require us to set up a whistleblower system in order to give employees and third parties the opportunity to report legal violations in the company in a protected manner. If a report received concerns an employee of Rahn Education, the processing also serves to prevent criminal offenses or other legal violations in connection with the employment relationship (Section 26 (1) BDSG).

The processing of your identification data is based on your consent (Art. 6 para. 1 lit. a GDPR), which is given by contacting the reporting office, even if the report can also be submitted anonymously. As a rule, consent can only be withdrawn within one month of receipt of the report, as Rahn Education is obliged in certain cases under Art. 14 para. 3 lit. a GDPR to inform the accused person of the allegations made against them and the investigations carried out within one month. This also includes the storage, the type of data, the purpose of the processing, the identity of the controller and - if legally required - of the reporting party, so that it is no longer possible to stop the data processing or delete the identification data. The revocation period may be shortened, e.g. if the type of notification requires the direct involvement of an authority or a court, because as soon as a disclosure has been made to the authority or the court, the identification data is in the case files of both Rahn Education and the authority or the court.

II. Processing of your personal data

The whistleblower system is used on a voluntary basis. We collect the following personal data and information when you submit a report:

- Your name, if you disclose your identity,
- Your contact details, if you provide them to us,
- the fact that you have made a report via the whistleblower system,
- whether you are employed by the company, affiliated companies or business partners and
- where applicable, names of persons and other personal data of the persons named in the notification

The data submitted to the whistleblower system is encrypted, password-protected and stored externally, so that access is initially restricted to a very narrow circle. The investigating officer examines the reported facts and, if necessary, conducts further case-related clarification of the facts; the data is always treated confidentially. However, confidentiality cannot be guaranteed if false information is knowingly posted with the aim of discrediting a person (denunciation).

In certain cases, Rahn Education is obliged under data protection law to inform the accused person of the allegations made against them. This is required by law if it is objectively clear that providing information to the accused person can no longer affect the concrete clarification of the information. As far as legally possible, your identity as the reporting party will not be disclosed and it will also be ensured that no conclusions can be drawn about your identity. As part of the processing of reports or an investigation, it may be necessary to pass on information to other managers at Rahn Education or its subsidiaries or business partners, e.g. if the information relates to events at subsidiaries or business partners. If necessary for the clarification, a transfer to business partners of Rahn Education in a country outside the European Union or the European Economic Area may take place on the basis of suitable or appropriate data protection guarantees for the protection of data subjects. Please note that not all third countries have a level of data protection recognized as adequate by the European Commission. For data transfers to third countries where there is no adequate level of data protection, we ensure that the recipient either has an adequate level of data protection (e.g. adequacy decision of the EU Commission or agreement of so-called EU standard contractual clauses of the European Union with the recipient) or that our users have given their express consent before the data is transferred. We always ensure that the relevant data protection regulations are complied with when passing on information.

In the event of a corresponding legal obligation or a requirement under data protection law for the clarification of information, other possible categories of recipients include law enforcement authorities, antitrust authorities, other administrative authorities, courts and international law firms and auditing firms commissioned by Rahn Education. Every person who receives access to the data is obliged to maintain confidentiality.

Personal data is stored for as long as required for clarification and final assessment, a legitimate interest of the company or a legal requirement exists. This data is then deleted in accordance with legal requirements. The duration of storage depends in particular on the severity of the suspicion and the reported possible breach of duty.

III. Your rights

Under European data protection law, you and the persons named in the notice have the right of access, rectification, erasure, restriction of processing and, in certain cases, the right to data portability.

You can also 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. The objection can be made informally and should preferably be sent to the contact details listed in this data protection notice.

If the right to object is exercised, we will immediately check the extent to which the stored data is still required, in particular for the processing of a reference. Data that is no longer required will be deleted immediately.

You can also withdraw your consent at any time.

You also have the right to lodge a complaint with a competent supervisory authority, e.g. the Saxon

Data Protection Commissioner
P.O. Box 11 01 32
01330 Dresden
E-mail: saechsdsb@slt.sachsen.de
Phone: +49 / 351 / 85471 101
Fax: +49 / 351 / 85471 109
Website: <https://www.saechsdsb.de>

IV. Your contact person

The contact persons for exercising your rights and further information can be found on the following website <https://rahn.education/en/data-protection> .

Our data protection officer is available to you as a contact person for data protection-related concerns:

Philipp Jentsch
Am Seif 24
04463 Großpösna
Phone: 034206 777608
E-mail: jentsch@bdsit.de