

## Privacy Notice for the RHI Magnesita Compliance Helpline

This Privacy Notice provides you with information on how we will process your personal data during the intake and handling of reports, if you use the Compliance Helpline (phone, web-based system, mobile application, email).

Your personal data will be processed in accordance with the legal requirements and the principles of the General Data Protection Regulation<sup>1</sup> (GDPR) and applicable local laws.

### Data controller

The data controller is RHI Magnesita GmbH, Kranichberggasse 6, A-1120 Vienna, Austria (hereinafter referred to as RHIM).

The Compliance Helpline is operated by an independent provider, People Intouch B.V. ("People Intouch") located in Amsterdam, the Netherlands<sup>2</sup>.

Your report will only be accessible to certain members of the Internal Audit, Risk & Compliance team of the RHI Magnesita Group who are responsible for the investigation.

### Categories of personal data processed

The type and amount of your personal data that we process depends on how you would like to use the Compliance Helpline, e.g. by staying anonymous or disclosing your name, and which other personal data you decide to share with us. Furthermore, we might process personal data of you which others provide to us when they use our internal reporting channels.

Personal data may include:

- Contact details (name, email address, phone number)
- Name of persons subject to an allegation
- Professional details (e.g. workplace contact information, job position, location)
- Any other personal data shared by the data subject via the reporting line.

The Compliance Helpline will ask you about the country from which you report, and you will need to choose your preferred language. RHIM will not be able to track back your identity based on this information.

It is up to you which channel you use if you report a concern. If you choose to report via phone, the data processor will transcribe your message and then deletes the voice message, this will not be shared with us.

Certain personal data provided by you is automatically collected when using the channels operated by our external provider (phone, web, app) and will not be shared with us. These data is processed to provide you with all functionalities of the reporting channels for authentication purposes, for notification purposes (if enabled, e.g. your email address), to establish a secure connection with your device and to prevent and detect security threats or other malicious activity. This information will not be used for any other purpose and will only be processed as long as necessary for the intended purpose. The processor has taken extensive measures to

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<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ([Regulation - 2016/679 - EN - gdpr - EUR-Lex \(europa.eu\)](#))

<sup>2</sup> You can find the Privacy Statement of People Intouch here: [Privacy statement \(speakup.com\)](#)



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prevent the loss, misuse or alteration of your personal data. All data is encrypted when transmitted to us via the web portal and the mobile app.

We do not use any automated individual decision-making (Article 22 of the GDPR) during data processing. This means that no decision is made on a purely automated basis.

### **Legal basis and purpose of data processing and data retention periods**

Personal data are processed:

- based on your consent when you submit a report (Art. 6 1. (a) of the GDPR)
- in compliance with a legal obligation<sup>3</sup> (Art. 6 1. (c) of the GDPR)
- for the purpose of our legitimate interest (Art. 6 1. (f) of the GDPR), such as conducting investigations to be able to identify any potential misconduct and to take appropriate measures in case of identified Compliance violations.

The processed personal data are used for the purposes of documenting reports and to investigate a reported concern.

If no specific retention period is applicable by law, your personal data is deleted upon fulfilment of the intended purpose.

Personal data processed as a result of information gathered through investigative work will be kept as long as necessary and for the purpose for which it has been collected in compliance with applicable local laws.

### **Transmission of personal data**

Your personal data may be passed on to the following recipients:

- members of the Internal Audit, Risk & Compliance team who are handling the investigation of the report;
- employees or managers of any RHI Magnesita Group entity, if it is necessary for the investigation and strictly on a need-to-know basis and by ensuring confidentiality and no risk of retaliation;
- third parties, if this is necessary for contract fulfilment, investigation or due to legal obligations (e.g. certified external auditors, lawyers).

In case we involve external parties, such as lawyers, translators and other subject matter experts, a Non-Disclosure Agreement will be concluded. Besides this, we will not share your personal data with third parties without your consent.

### **Data processing locations**

Your personal data shall be primarily processed in Austria and other EU/EEA countries or another country in which the RHI Magnesita Group and/or its data processors are located or have servers and facilities. In such cases, we take appropriate measures, especially through corresponding contractual agreements, to ensure that your personal data are always protected according to GDPR. If personal data are transmitted outside of the EU/EEA to a country for which there is no corresponding adequacy decision by the European Commission, we rely on suitable guarantees such as those of the standard contract clauses authorised by the European Commission.

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<sup>3</sup> This refers especially to compliance with the EU Whistleblower Protection Directive (Directive (EU) 2019/1937) and its national implementations which oblige RHIM to establish and operate internal reporting channels as well as to handle incoming reports.



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## **Your rights**

You are entitled to the rights to data access, correction, deletion, restriction, portability and objection. If the processing of your personal data is based on your consent, you can revoke this consent at any time by writing to [dataprivacy@rhimagnesita.com](mailto:dataprivacy@rhimagnesita.com) without it affecting the lawfulness of the data processing up to the time of your revocation.

To claim your rights, or if you believe that the processing of your personal data infringes applicable data protection laws or your data protection rights have otherwise been contravened, you can contact us, or the Austrian data protection authority ([dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)) or the authority of your country of residence.

As your satisfaction is important to us, we kindly request that you notify us directly of any complaints or comments:

### **Contact details:**

RHI Magnesita GmbH

Attn. Data Protection Coordinator

Kranichberggasse 6

A-1120 Vienna, Austria

Telephone: +43 502 13-0

[dataprivacy@RHIMagnesita.com](mailto:dataprivacy@RHIMagnesita.com)