

Privacy Policy for whistleblowers of the Telefónica Deutschland Group

This data protection policy applies to the following companies of the Telefónica Deutschland Group: Telefónica Germany GmbH & Co. OHG, Telefónica Germany Retail GmbH, TGCS Hamburg GmbH, TGCS Bremen GmbH, TGCS Rostock GmbH, TGCS Nürnberg GmbH, Ortel Mobile GmbH, Ay Yildiz Communications GmbH, E-Plus Service GmbH, TCFS Potsdam GmbH, Telefónica Germany Business Sales GmbH.

These companies have set up a whistleblower procedure within the Telefónica Deutschland Group (hereinafter referred to as "we" and "our"). This privacy policy informs you about the processing of personal data in connection with the submission and processing of information that you submit via the Telefónica Deutschland Group's whistleblower procedure.

The whistleblower procedure is open to any person who wishes to report (potential) wrongdoing that (i) has come to their attention in connection with their professional activities or (ii) has arisen or is reasonably likely to arise as a result of the business activities of one of the companies of the Telefónica Deutschland Group or a direct or indirect supplier.

This privacy policy sheet does not apply if you use our whistleblower procedure anonymously without providing personal data.

Further information on the whistleblower procedure can be found at <https://www.telefonica.de/home-corporate-en/whistleblowing-procedure>

1. Contact details of the Controller and Data Protection Officer

The controller is the company that is your employer or whose business activities are the subject of your report. The contact details of the responsible company and the data protection officer can be found in the enclosed **annex**.

2. Personal data

Personal data is any information relating to an identified or identifiable natural person (hereinafter "data subject"). Personal data therefore includes, for example, first and last name, address, date of birth, email addresses or telephone numbers.

3. Purposes and legal bases of data processing

We process personal data in accordance with data protection regulations.

3.1. Compliance with a legal obligation (Art. 6 para. 1 c) GDPR)

We process your personal data for the purpose of recording and investigating reports and to detect and prevent violations of applicable law. The investigation of reports includes, in particular checking the validity of the information provided in the report.

The processing also includes the initiation of follow-up measures, in particular the conduct of internal investigations, the collection and preservation of evidence and communication with you as the whistleblower. We also process your personal data for the purpose of concluding the proceedings or for submitting the proceedings to a competent authority.

In the case of an anonymous report, we will not be able to acknowledge receipt of your report, discuss your report with you later or inform you of the outcome of the process or any action taken. In this case, it is particularly important that you provide as much information as possible when submitting your report so that your report can be properly understood and processed.

We are subject to various legal requirements that may result in an obligation to process personal data as described above: the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), the German Whistleblower Protection Act (HinSchG) as well as other legal obligations (e.g. obligations to provide evidence) or official orders.

3.2. Processing on the basis of consent (Art. 6 para. 1 a) GDPR)

We process your personal data if you have given us your consent to do so, e.g. for the disclosure of information about your identity to third parties (Section 9 (3) HinSchG). You have the option to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. You will receive further information, e.g. on the purposes and your revocation options, when you give your consent.

4. Recipients of personal data

Insofar as this is necessary for the fulfillment of the above-mentioned purposes, the following recipients have access to your personal data to the extent necessary:

- Report officer for the performance of statutory/regulatory tasks
- Processors who support us with data processing within the framework of commissioned processing in the area of IT operations. These service providers have been carefully selected and are subject to strict contractual agreements, including confidentiality.
- other recipients outside our company who do not work for us within the framework of commissioned data processing:
 - Tax consultant/auditor, to guarantee and review the accounting of legal requirements (e.g. tax law requirements);
 - Lawyers to represent and enforce our legal interests;
 - Logistics providers used for mail delivery.

These recipients are also obliged to comply with data protection due to legal or professional obligations or contractual agreements.

- State or European authorities (e.g. criminal proceedings at the request of the criminal prosecution authorities) in individual cases on the basis of legal obligations.

5. Data processing in third countries

We only process your personal data in Germany and in the European Union.

Personal data is processed outside the European Union (so-called third countries) if an "adequacy decision" of the European Commission (Art. 45 GDPR) exists for this third country, "appropriate safeguards" (Art. 46 GDPR) or "internal data protection rules" (Art. 47 GDPR) are in place at the recipient. If necessary, additional measures are agreed with the recipient in the third country. General information on the adequacy decisions can be found at https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en, on the available appropriate guarantees at

https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en and on the internal data protection regulations at https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/binding-corporate-rules-bcr_en. For further information, please contact the controller.

6. Deletion of personal data

The personal data processed as part of the whistleblowing procedure is generally stored for three years after the conclusion of the procedure, unless the initiation of further legal action requires further storage (e.g. initiation of criminal proceedings or disciplinary proceedings). In the case of reports of human rights or environmental risks or violations, the retention period is seven years.

7. Your rights

As a data subject within the meaning of the GDPR, you have the following rights:

- You have the right to obtain information about your processed data (Art. 15 GDPR).
- If you wish to correct incorrect personal data or complete incomplete data (Art. 16 GDPR), you can generally do this in the online self-service area.
- Under certain legal conditions, you have the right to erasure of your personal data (Art. 17 GDPR).
- Under certain legal conditions, you have the right to restrict processing (Art. 18 GDPR).
- Under certain legal conditions, you have the right to receive or transfer the personal data concerning you (Art. 20 GDPR). Please log in to your online self-service area to exercise this right.
- You have the right to withdraw your consent to the processing of your personal data at any time with effect for the future. The legality of the processing carried out on the basis of the consent until the revocation remains unaffected by the revocation. We will inform you how you can declare your revocation when we obtain your consent.
- Under certain legal conditions, you have the right to object. We inform you about this in the following section of this data protection information sheet.

To exercise your rights, you can use the same contact channels that you used to submit your report. If you have sent your report to the ombudsperson, you can send inquiries about your rights to us via the following contact channels:

For human rights and environmental information humanrights-de@telefonica.com and otherwise tell-us@telefonica.com

In each case, please indicate which of the Telefónica companies you wish to address your request to.

In addition, you have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR). You can contact the data protection supervisory authority for this purpose.

8. Modifications to this privacy policy

As changes to the law or changes to our internal company processes may make it necessary to amend this data protection information sheet, which we reserve the right to do accordingly, you can access the current version of the data protection information sheet at <https://www.telefonica.de/privacy-information-whistleblowing-procedure>

Annex:
Contact Details of the companies and data protection officers

Controller	Data Protection Officer
Telefónica Germany GmbH & Co. OHG	
<p>Telefónica Germany GmbH & Co. OHG Georg-Brauchle-Ring 50, 80992 Munich</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>	<p>Telefónica Germany GmbH & Co. OHG Data Protection Officer Georg-Brauchle-Ring 50, 80992 Munich</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>
Telefónica Germany Retail GmbH	
<p>Telefónica Germany Retail GmbH E-Plus-Straße 1, 40472 Düsseldorf</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>	<p>Telefónica Germany Retail GmbH Data Protection Officer E-Plus-Straße 1, 40472 Düsseldorf</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>
TGCS Hamburg GmbH	
<p>TGCS Hamburg GmbH Überseering 33a, 22297 Hamburg</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>	<p>TGCS Hamburg GmbH Data Protection Officer Überseering 33a, 22297 Hamburg</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>
TGCS Bremen GmbH	
<p>TGCS Bremen GmbH Linzer Straße 9, 28359 Bremen</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>	<p>TGCS Bremen GmbH Data Protection Officer Linzer Straße 9, 28359 Bremen</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>
TGCS Rostock GmbH	
<p>TGCS Rostock GmbH Loggerweg 5, 18055 Rostock</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>	<p>TGCS Rostock GmbH Data Protection Officer Loggerweg 5, 18055 Rostock</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>
TGCS Nürnberg	

<p>TGCS Nürnberg GmbH Südwestpark 38, 90449 Nürnberg</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>	<p>TGCS Nürnberg GmbH Data Protection Officer Südwestpark 38, 90449 Nürnberg</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>
Ortel Mobile GmbH	
<p>Ortel Mobile GmbH E-Plus-Straße 1, 40472 Düsseldorf</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>	<p>Ortel Mobile GmbH Data Protection Officer E-Plus-Straße 1, 40472 Düsseldorf</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>
Ay Yildiz Communications GmbH	
<p>Ay Yildiz Communications GmbH E-Plus-Straße 1, 40472 Düsseldorf</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>	<p>Ay Yildiz Communications GmbH Data Protection Officer E-Plus-Straße 1, 40472 Düsseldorf</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>
E-Plus Service GmbH	
<p>E-Plus Service GmbH E-Plus-Straße 1, 40472 Düsseldorf</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>	<p>E-Plus Service GmbH Data Protection Officer E-Plus-Straße 1, 40472 Düsseldorf</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>
TCFS Potsdam GmbH	
<p>TCFS Potsdam GmbH Edisonallee 1, 14473 Potsdam</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>	<p>TCFS Potsdam GmbH Data Protection Officer Edisonallee 1, 14473 Potsdam</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>
Telefónica Germany Business Sales GmbH	
<p>Telefónica Germany Business Sales GmbH E-Plus-Straße 1, 40472 Düsseldorf</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>	<p>Telefónica Germany Business Sales GmbH Data Protection Officer E-Plus-Straße 1, 40472 Düsseldorf</p> <p>Encrypted contact form: https://www.telefonica.de/datenschutz-kontakt</p>