

RUAG Whistleblowing Privacy Notice

Version: 01.07.2019

Data protection is a matter of trust and your trust is a core value of the RUAG group and of all its legal entities (“**RUAG**” and/or “**we**” and/or “**us**”). This privacy notice („**Privacy Notice**”) is based on the EU General Data Protection Regulation („**GDPR**”) – even where the GDPR does not apply – to ensure a high level of protection for all individuals whose personal data is processed by RUAG in the frame of a whistleblowing process and of the use of EQS Integrity Line. This Privacy Notice applies therefore to yourself and your personal data as whistle-blower.

We may amend this Privacy Notice at any time. The version in force when you use the EQS Integrity Line and report as whistle-blower is the applicable version.

1. Who we are

RUAG is the controller of your personal data in accordance with this Privacy Notice. Should you have any questions in connection with the processing of your personal data, please contact directly the RUAG Data Protection Team by email at data.protection@ruag.com or by postal letter at RUAG Corporate Services AG, Data Protection Team, Stauffacherstrasse 65, 3000 Bern 22, Switzerland. Other RUAG processing activities are described in our general RUAG Privacy Notice under www.ruag.com/privacy.

The technical implementation of the EQS Integrity Line is carried out on our behalf by EQS Group AG, Hardturmstrasse 11, 8005 Zurich, Switzerland ("EQS").

2. Personal data we process

In principle, the EQS Integrity Line can be used – to the extent permitted by law – without providing your personal data. You may, however, voluntarily disclose your personal data as part of the whistleblower process, in particular information about your identity, e.g. your first and last name, your country of residence, your telephone number or your email address.

In principle, we do not request or process any special categories of personal data (also known as sensitive personal data), e.g. information on racial and/or ethnic origin, religious and/or ideological convictions, trade union membership or sexual orientation. Due to free text fields in the registration form, however, such special categories of personal data may be voluntarily disclosed by you.

Your notice may also contain personal data of third parties, which you refer to. Affected persons will be given the opportunity to comment on the information. In such a case, we will inform the concerned persons about the notice but your anonymity will be guaranteed as the concerned person – as far as legally possible – will not be given any information about your identity. Your information is therefore used in such a way that your anonymity is not endangered.

3. Purposes of and legal grounds for processing

By using the EQS Integrity Line, you can get in touch with us and report any compliance or legal violations. We process your personal data in order to check the report you have made through the EQS Integrity Line and to investigate suspected compliance or legal violations. It may happen that we have questions to you. For this purpose, we exclusively use communication through the EQS Integrity Line – unless you have given your explicit consent to another form of communication. The confidentiality of the information provided by you is our top priority and is therefore guaranteed.

Your personal data will be processed in accordance with and on the basis of your consent given when reporting via the EQS Integrity Line (article 6 para.1 let. a GDPR). Furthermore, we process your personal data insofar as this is necessary for the fulfilment of our legal obligations. This includes, in particular, reports of facts relevant to criminal law, competition law and labour law (article 6 para. 1 let. c GDPR). Your personal data will also be processed if this is necessary to safeguard the legitimate interests of RUAG or of a third party (article 6 para. 1 let. f GDPR). We have a legitimate interest in the processing of personal data to prevent and detect violations within RUAG, to verify the legality of internal processes and to protect our integrity.

If you provide us with special categories of personal data (e.g. sensitive personal data), we will process these on the basis of your consent (article 9 para. 2 let. a GDPR). In addition, we are also using your personal data in anonymous form for statistical purposes.

We do not intend to use your personal data for purposes other than those listed above. Otherwise, your prior consent will be obtained.

4. Technical implementation and security of your data

The EQS integrity line includes an option for anonymous communication via an encrypted connection. During use, your IP address and your current location are not stored at any time. After sending a message, you will receive access data to the EQS Integrity Line mailbox so that you can continue to communicate with us in a secure manner.

RUAG maintains appropriate technical and organisational measures to ensure data protection and confidentiality and we continually adapt these measures to ongoing technological developments. Moreover, the data you provide us with will be stored in a specially secured EQS database. EQS encrypts all data stored in the database according to the current state of the art.

5. Disclosure of personal data

RUAG operates internationally and has locations in various countries within and outside the European Union. The stored data may only be processed by specially authorised persons within RUAG. Insofar as this is necessary to fulfil the aforementioned purpose, specially authorised persons of our subsidiaries may also be entitled to inspect the documents. This is particularly the case when the investigation is carried out in the country concerned. All persons authorised to inspect the data are expressly obliged to maintain confidentiality.

In order to fulfil the aforementioned purpose, it may also be necessary for us to transfer your personal data to external bodies such as law firms, criminal or competition authorities, within or outside the European Union.

If we pass on your personal data within the group or externally, a uniform level of data protection is ensured by means of internal data protection regulations and/or corresponding contractual agreements. In all cases, the responsibility for data processing remains with RUAG.

Finally, we transfer your personal data to EQS to the extent described above for technical implementation. To this end, we have concluded an order data processing agreement with EQS to ensure data protection. Please contact the RUAG Data Protection Team (data.protection@ruag.com) should you have any question with regard to the processing of your data.

6. Duration of storage

We store personal data only as long as it is necessary for the processing of your notice or we have a legitimate interest in the storage of your personal data. Storage can also take place if this has been provided for by European or national legislation to fulfil legal obligations, such as storage obligations. Subsequently, all personal data will be deleted, blocked or anonymised.

7. Your rights

If you have provided us with your personal data, you have the right to information, correction and deletion of said personal data. You may also restrict the processing or require it to be transferred to another controller. Furthermore, you have the right to object to the processing of your personal data at any time for reasons related to your particular situation. You have the right to revoke your declaration of consent at any time. The revocation of the consent does not affect the legality of the processing carried out on the basis of the consent up to the revocation.

You assert these rights by informing the RUAG Data Protection Team (data.protection@ruag.com). If you have asserted your right to correction, deletion or restriction of processing your personal data, we are obliged to inform all recipients to whom we have disclosed your personal data of this correction or deletion or restriction of processing, unless this would be impossible or would involve disproportionate efforts. RUAG will inform you about these recipients upon request.

Finally, without prejudice to any other administrative or judicial remedy, you have the right to complain to a supervisory authority, in particular in the member state of your residence, place of work or place of presumed infringement, if you consider that the processing of your personal data is contrary to the GDPR.