

## RUAG International Whistleblowing Privacy Notice

Data protection is a matter of trust, and your trust is a core value of RUAG International Holding AG (hereinafter referred to as “**RUAG**” and “**RUAG International**”). This privacy notice („**Privacy Notice**”) is based on the EU General Data Protection Regulation („**GDPR**”) requirements – even where GDPR does not apply – to ensure a high level of protection for all individuals whose personal data is processed by all legal entities of RUAG in the frame of a whistleblowing process and of the use of the EQS Integrity Line (“**EQS**” or “**Whistleblowing platform**”).

This Privacy Notice describes the processing of personal data by all legal entities of RUAG, unless specified otherwise, such as additional privacy notices or in a contract.

Reports on matters that are not a breach of law, policy and/or other regulatory obligations, such as with salary, difficulties with cooperation between colleagues or general complaints, should be made via the usual internal channels if you are an employee of RUAG or working for RUAG on an occasional basis.

### 1. Who we are?

RUAG International Group, including legal entities (e.g., Beyond Gravity companies) controlled by RUAG is responsible for the processing of personal data according to this Privacy Notice (also referred hereinafter to as “**we**” and/or “**us**”). Each RUAG company that processes personal data for its own business purposes acts as a data controller. For example, if you interact with a company about a matter concerning that company, it will be the controller of the personal data processed in parity with your request. A detailed list of the different RUAG companies and their contact details is available at <https://www.ruag.com/en/imprint>.

For further information on how RUAG processes your data, please refer to our General RUAG International Privacy Notice available at <https://www.ruag.com/en/privacy>.

If you have any questions or requests in relation to the processing of your personal data, you can contact our Data Protection Team at [data.protection@beyondgravity.com](mailto:data.protection@beyondgravity.com). The technical implementation of the EQS Integrity Line is carried out on our behalf by EQS Group AG, Hardturmstrasse 11, 8005 Zurich, Switzerland (“**EQS**”).

The reporting via the mentioned whistleblowing platform is one of the forms, how you may report your concern. You also can report your concerns via the usual internal reporting channels, via the phone or in person.

### 2. Which personal data do we process and for what purposes?

“**Personal data**” is the information relating to yourself (or from which you may be identified). In principle, the EQS Integrity Line can be used – to the extent permitted by law – without providing your personal data (in anonymous way). 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 and your organisation’s name. We may also ask for further information so that we can investigate your concerns, such as organization and/or individuals affected as well as supporting documents and/or evidence. If you choose to make a disclosure anonymously, please be informed, that we may not be able to investigate your concern as effectively. You should also recognize that you might be identifiable by others due to the nature or circumstances of your concern.

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.

We may also process personal data relating to individuals alleged to have committed a breach, as well as other parties involved who are mentioned in breach reports submitted via the whistleblowing platform.

Finally, RUAG does not accept any kind of retaliation, discrimination, or disciplinary action against anyone for raising concerns in good faith or based on a reasonable belief of violation or suspected violation, even if the reported facts are later revealed to be inaccurate or do not lead to any follow-up measures. However, should a whistleblowing process be abused (e.g., by making malicious reports or reports in bad faith, with the intention of personal gain etc.), such person may face disciplinary measures and such actions may be subject to legal proceedings.

By using the EQS Integrity Line, you can get in touch with us and report any compliance or legal violations. We may process your personal data 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.

### **3. On what legal bases do we process your personal data?**

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, as RUAG operates in some countries where an established whistleblowing system is required by law (based on their national legislations implementing the EU Directive about Whistleblowing<sup>1</sup> as well as other applicable local laws in countries where RUAG operates), 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. Who may have access to your 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 purposes, 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.

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<sup>1</sup> Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

To fulfil the aforementioned purposes, 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.

We may also transfer your personal data to our external attorney or auditor, for example, in connection with the processing of the concern, including reporting the concern to relevant authorities.

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. If we disclose your personal data to a recipient in such a country, we typically enter into the European Commission's standard contractual clauses (available [here](#)) in order to ensure the data protection level and safeguards required by the applicable law. For more details on this topic, please refer to our general RUAG Privacy Notice available at <https://www.ruag.com/en/privacy>.

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. EQS Group AG will not have access to the content of your reports. Please contact directly the RUAG Data Protection Team at [data.protection@beyondgravity.com](mailto:data.protection@beyondgravity.com) should you have any question with regard to the processing of your data.

## 5. How long do we retain your personal data?

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 either deleted or retained in a form that does not allow your personal identification (e.g., through anonymization).

## 6. How do we protect your personal 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.

## 7. What are your rights with respect to your personal data?

You have certain rights under applicable data protection laws, in particular the following rights, in each case as set forth and within the limits of applicable law:

- **Right of access:** You are entitled to a copy of the personal information we hold about yourself and certain details on how we use it. Your personal data will usually be provided to yourself in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible. If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.
- **Right to rectification:** We take reasonable steps to ensure that the information we hold about yourself is accurate and complete. However, if you do not believe this is the case, you can ask RUAG to update or amend it.

- **Right to erasure:** In certain circumstances, you have the right to ask RUAG to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors (e.g., we may have legal and regulatory obligations, which means we cannot comply with your request).
- **Right to restriction of processing:** In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information, we hold about yourself, may be inaccurate or where you think that we no longer need to use your personal information.
- **Right to data portability:** In certain circumstances, you have the right to ask that we transfer personal information that you have provided to us to another third party of your choice.
- **Right to object:** You have the right to object to processing, which is based on our legitimate interests, which is the case here. Unless we do have a compelling legitimate ground for the processing, we will no longer process the personal data on that basis when you file an objection. Note however, that we may not be able to provide certain services if we are unable to process the necessary personal data for that purpose.
- **Rights relating to automated decision-making:** You have the right not to be subjected to automated decision-making, including profiling, which produces legal effect for yourself or has a similar significant effect. We generally do not use automated decision-making or profiling in the employment context, but if you have been subject to an automated decision and do not agree with the outcome, you can directly contact the RUAG Data Protection Team and ask us to review the decision.
- **Right to withdraw consent:** In most cases, we do not base the processing of your personal data on your consent. However, it may happen that we ask for your consent in specific cases. In case we do this, you have the right to withdraw your consent to further use of your personal information. To withdraw your consent, please contact the RUAG Data Protection Team. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. In addition, if you withdraw consent, it will not affect the lawfulness of what we have done before such withdrawal.
- **Right to lodge a complaint:** You have the right to lodge a complaint with a supervisory authority. The supervisory authority of your country of residence will generally be competent for a complaint and will also provide advice or direct you to another supervisory authority.

To exercise these rights, please contact directly the RUAG Data Protection Team at [data.protection@beyondgravity.com](mailto:data.protection@beyondgravity.com). Please note that these rights are subject to certain conditions and may be subject to exceptions.

## 8. Contact details

If you have any questions or would like to exercise your rights in relation to the processing of your personal data, please contact directly the RUAG Protection Team at [data.protection@beyondgravity.com](mailto:data.protection@beyondgravity.com).

Physical requests may be sent to:

**RUAG International Holding AG**  
Global Data Protection Officer  
Bahnhofplatz 10b  
3011 Bern  
Switzerland

or to each respective RUAG company in its role as Data Controller. A detailed list of the different RUAG companies and their contact details is available at <https://www.ruag.com/en/imprint>.

## **9. Changes to this Privacy Notice**

This privacy notice may be changed by us unilaterally from time to time, in particular, if we change our data processing or in case of new legislation. Please refer often to this page for the latest information and the effective date of any changes. The version published on this website is the current version. The version in force when you use the EQS Integrity Line and report as whistleblower is the applicable version. Changes to the Notice shall not apply retroactively.