



Notes on data protection within the whistleblower system

AUDI AG

85045 Ingolstadt
Germany

Information on data protection

We would like to inform you here about the collection, processing and use of personal data within the framework of the whistleblower system if you submit a hint by e-mail, telephone, letter or in person to the Audi Investigation Office. Please read this data protection information carefully before submitting a hint.

Type of personal data

Use of the whistleblower system is voluntary. If you submit a hint via the system, we collect the following personal data and information:

- Your name, if you disclose your identity,
- Your contact details, if you provide them,
- The fact that you have made a hint via the whistleblower system,
- Whether you are employed by AUDI AG and
- Where applicable, names of persons and other personal data of the persons you mention in your hint.

Purpose of the whistleblower system and data processing/legal basis

The whistleblower system serves to receive and process in a secure and confidential manner any hints of (suspected) violations of the law or of serious internal rule violations against the Audi Group.

The processing of personal data within the framework of the whistleblower system is based on the legitimate interest of AUDI AG to detect and prevent irregularities and avoid the associated damage and liability risks for the Audi Group (Art. 6 para. 1 lit. f DSGVO (GDPR - General Data Protection Regulations)) in conjunction with sections 30, 130 OWiG (Act on Regulatory Offenses)). Section 4.1.3. of the German Corporate Governance Code likewise calls for the establishment of a whistleblower system in order to give employees and third parties the opportunity to provide in a suitable manner any confidential hints about legal infringements within the company.

If an incoming hint concerns an employee of AUDI AG, the process also serves to prevent criminal offenses or other legal violations in connection with the employment relationship (Section 26 para. 1 BDSG (Federal Data Protection Act)).



Processing of the whistleblower's identification data is based on consent to be given (Art. 6 para. 1, lit. a GDPR). The voluntary nature of the consent is given by the fact that the information can also be provided anonymously. As a rule, however, consent can only be revoked within one month of receipt of the hint, as AUDI AG is obliged in certain cases under Art. 14 para. 3 lit. a GDPR to inform the person implicated of the claims made against him and of the investigations conducted against him within one month, including the retention, nature of the data, the purpose of processing and the identity of the person responsible and, if applicable, of the whistleblower, and it is then no longer possible to stop processing the whistleblower's identification data. Moreover, processing of the data has already progressed so far after the date that deletion is no longer possible. However, the revocation period may also be shortened, sometimes considerably. This is the case if the nature of the notification requires the direct involvement of the authorities or a court. As soon as we have disclosed the name to the authorities or a court, it will be stored in our case files as well as by the authorities or court and can no longer be deleted.

Responsible party

The party responsible for data protection in the whistleblower system is AUDI AG, Auto-Union-Straße 1, 85057 Ingolstadt, Germany. All data is encrypted and stored with multilevel password protection so that access is restricted to a very small circle of expressly authorized AUDI AG personnel.

AUDI AG has appointed a Data Protection Officer. Those affected can contact the AUDI AG Data Protection Officer directly:

- AUDI AG
- Data Protection Officer
- Auto-Union-Straße 1
- 85057 Ingolstadt
- E-Mail: datenschutz@audi.de

Confidential treatment of hints and disclosure to third parties

Incoming information is received by a small group of expressly authorized and specially trained employees of the Compliance Department of AUDI AG and is always treated confidentially. Employees of the Compliance Department examine the facts of the case and, if necessary, carry out a more detailed case-related investigation.

In certain cases, AUDI AG is obliged under data protection law to inform the person implicated of the accusations made against them.

If there is a significant risk that such information would jeopardize the effective investigation of the accusation or the collection of necessary evidence, the information to be provided to the person implicated may be postponed for as long as this risk exists.



In doing so, your identity as a whistleblower will not be disclosed – insofar as this is permissible in accordance with Art. 14 para. 3 lit. a GDPR.

Confidentiality cannot be guaranteed if false information is knowingly given with the aim of discrediting a person (denunciation).

In the course of processing a report or as part of an investigation, it may be necessary to pass on information to other employees of AUDI AG or subsidiaries of AUDI AG and their employees, e.g. if the information relates to events in subsidiaries of the Audi Group.

If necessary for clarification purposes, information may be forwarded to subsidiaries of the Audi Group in a country outside the European Union or the European Economic Area on the basis of suitable or appropriate data protection guarantees in order to protect those concerned.

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, prior to disclosure, the recipient has either 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 we have obtained express consent from our users.

We always ensure that the relevant data protection regulations are observed when passing on information.

Where there is a corresponding legal obligation or data protection requirement for the clarification of information, other conceivable categories of recipients include law enforcement authorities, cartel authorities, other administrative bodies, courts and international law firms and auditing firms commissioned by the AUDI Group.

Any person who is given access to the data is obliged to maintain confidentiality.

Retention period for personal data

Personal data is stored for as long as the clarification and final assessment requires it, or if a legitimate interest of the company exists or if this is required by law. After that, this data is deleted in accordance with legal requirements. The duration of retention depends in particular on the severity of the suspicion and the reported possible breach of duty.



Rights of the data subject

According to European data protection law, you and the persons mentioned in the hint have the right of access, rectification, erasure, restriction of processing as well as a right to object to the processing of your personal data and, in certain cases, the right to data transferability.

Right to objection: You have the right, for reasons arising from your specific situation, to object to the processing of your personal data. The requirement for this is that the data processing is done in the public interest or done with the intention of balancing interests. The objection can be made informally and, where possible, should be sent using the contact information provided in this data protection notification. If the right of objection is exercised, we will immediately check to what extent the stored data is still required; in particular for processing a hint. Data that is no longer required is to be deleted immediately.

You can also revoke your consent at any time. In this context, please note the information under "Purpose of the Whistleblower System and data processing".

Further information and the possibility to assert your rights can be found under:

- Website: [https:// www.audi.de/betroffenenrechte](https://www.audi.de/betroffenenrechte)
- AUDI AG, Zentrale Anlaufstelle, Ettinger Straße, 85057 Ingolstadt

They also have a right of appeal to a competent supervisory authority:

- Bayerisches Landesamt für Datenschutzaufsicht
Promenade 18
91522 Ansbach
Deutschland
- <https://www.lda.bayern.de>

Further information about data protect at AUDI AG can be found [here](#).