

Information on data processing

Whistleblower System

Name and contact details of the controller (Art. 13 para. 1 a GDPR)

diconium GmbH
Rommelstraße 11
70376 Stuttgart
E-Mail: info@diconium.com

Name and contact details of the data protection officer (Art. 13 para. 1 b GDPR)

diconium digital solutions GmbH
Rommelstraße 11
70376 Stuttgart
Personally responsible: Herr Michael Knof
E-Mail: datenschutz@diconium.com

Purpose and legal basis of data processing (Art. 13 para. 1 c GDPR)

The processing of personal data in the context of the whistleblower system is based on the legitimate interest of detecting and preventing possible misconduct by our employees or our suppliers. Processing also takes place in order to uncover possible misconduct, take preventive measures and minimize damage and liability risks as a result, as well as to comply with the legal obligations arising from the Whistleblower Protection Act (Art. 6 para. 1 f GDPR and Art. 6 para. 1 c GDPR in conjunction with the Whistleblower Protection Act).

If a report received concerns data of employees of diconium, the data is also processed for the above-mentioned purposes and for the prevention and detection of criminal offences in the context of the employment relationship (Section 26 (1) sentence 2 BDSG).

Recipients or categories of recipients of the personal data (Art. 13 (1) e GDPR)

The diconium Group has entrusted the Central Investigation Office of Volkswagen AG with the provision of the whistleblower system. Information on how the Central Investigation Office or the ombudspersons of the anonymous whistleblower system process the data can be found in Volkswagen AG's data protection information: <https://www.volkswagen-group.com/de/publikationen/weitere/hinweise-zum-datenschutz-im-hinweisgebersystem-der-volkswagen-ag-2014>

If you contact the diconium Group directly with a report, we process the data directly on our own system. For this purpose, we use hosting service providers and software-as-a-service providers who support us in providing the data processing systems.

It may also be necessary to involve external consultants or lawyers to assess or pursue your report.

All recipients involved in the proceedings are obliged to maintain confidentiality and have taken measures to ensure the confidentiality and, if necessary, anonymity of the whistleblowers.

Should criminal or legal proceedings arise within the proceedings, it may also be necessary to pass on data to law enforcement authorities and courts.

We ensure that we do not take any measures to identify anonymous whistleblowers who do not abuse our whistleblowing system. We also guarantee to ensure anonymity towards recipients and not to pass on the data of a whistleblower, even in the case of non-anonymous reports, as long as it is not absolutely necessary for clarification and is legally permissible.

Transfer to third countries (Art. 13 para. 1 f GDPR)

In principle, no personal data will be transferred to third countries when processing requests from data subjects. If a report is made on data processing that takes place in third countries, it cannot be ruled out that personal data will have to be transferred to third countries in order to carry out an audit.

Data processing in third countries will only take place with your prior consent (Art. 49 para. 1 lit. a GDPR) or if we have provided sufficient guarantees for the protection of personal data with the recipients of the data (Art. 46 GDPR).

Storage period in accordance with statutory retention obligations (Art. 13 para. 2 a GDPR). 2 a GDPR)

The deletion of personal data processed in the context of a report or its logging takes place 3 years after the end of the procedure, unless other regulations from the Whistleblower Protection Act conflict with this.

Right to information, correction, deletion, restriction, data portability and objection (Art. 13 para. 2 b GDPR)

As a data subject, you have the right to information, correction and deletion of your data and to restriction of processing as well as a right to data portability at any time.

In addition, you are entitled at any time to object to data processing for which we rely on a legitimate interest, if your particular situation gives rise to reasons that speak against the processing of your data.

To exercise your rights, please contact the controller using the contact details provided.

Right to lodge a complaint (Art. 13 para. 2 d GDPR)

If you have a complaint, you can contact the responsible supervisory authority at any time. The Landesbeauftragten für den Datenschutz und die Informationsfreiheit Baden-Württemberg is responsible for diconium.