

Privacy Policy

隐私政策

Muhr und Bender KG (hereinafter referred to as "**We**"/"**Us**") takes the protection of personal data very seriously. This privacy policy informs about what personal data we collect from you when using the Mubea Grievance System and how we use such data.

Muhr und Bender KG（以下简称“我们”）非常重视个人数据的保护。本隐私政策告知我们在使用慕贝尔申诉系统时会向您收集哪些个人数据，以及我们如何使用这些数据。

We ensure compliance with the applicable data protection regulations through appropriate technical and organizational measures.

我们通过可适用的技术和措施确保遵守相关的数据保护法规。

Responsible body and data protection officer

责任主体和数据保护官

Responsible for the processing of personal data is
负责处理个人数据的是

Muhr and Bender KG

Mubea-Platz 1, 57439 Attendorn

Muhr and Bender KG

德国阿滕多恩市慕贝尔广场 1 号，邮编：57439

You can find the contact details in the legal notice.

您可以在法律声明中找到联系方式。

The data protection officer of the company can be reached under the following email address: datenschutz@via-consult.de.

可以通过以下电子邮件地址联系公司的数据保护官：datenschutz@via-consult.de。

The technical implementation of the Mubea Grievance System is carried out on our behalf by EQS Group AG ("**EQS**").

慕贝尔申诉系统由 EQS Group AG（简称“EQS”）公司提供，代表我们实施。

Personal data

个人数据

In principle, it is possible to use the Mubea Grievance System - as far as legally permissible - without providing personal data. However, you can voluntarily provide personal data as part of the reporting process, in particular information about your identity, first and last name,

country of residence, telephone number or email address.

一般而言，在法律允许的范围内，可以在不提供个人数据的情况下使用慕贝尔申诉系统。但是，作为举报流程的一部分，您可以选择自愿提供个人数据，特别是有关您的身份、姓名、居住国家/地区、电话号码或电子邮件地址等信息。

Generally, we do not request and process any special categories of personal data, e.g. information on ethnic origin, religious and/or ideological beliefs, trade union membership or sexual orientation. However, such special categories of personal data can be voluntarily disclosed by you due to free text fields in the report form.

通常，我们不会请求和处理任何特殊类别的个人数据，例如有关种族血统、宗教和/或意识形态信仰、工会会员身份或性取向的信息。但是，由于举报表单中含有自由文本字段，您可以自愿披露此类特殊类别的个人数据。

The report submitted by you may also contain personal data of third parties to which you refer in your report. In justified cases of suspicion, the persons concerned will be given the opportunity to comment on the report. Your confidentiality is, however, also protected in this case, as the persons concerned will not be given any information about your identity - as far as legally possible - and your report will be used in such a way that your anonymity is not jeopardized.

您在填报举报信息过程中还可能包含您在该流程中提及的第三方的个人数据。在有正当理由怀疑的情况下，有关人员将有机会对举报信息发表意见。但是，在这种情况下，您的机密性也会受到保护，因为在法律允许的范围内，不会向相关人员提供有关您身份的任何信息，并且您的举报信息将在匿名情况下进行使用。

Purpose and legal basis of processing

处理的目的是法律依据

The Mubea Grievance System enables you to contact us and submit reports on violations of applicable law and internal guidelines. We process your personal data in order to review the report submitted by you via the Mubea Grievance System and to investigate the suspected violations. In doing so, we may have further questions to you. We only use communication via the Mubea Grievance System for this purpose.

通过慕贝尔申诉系统，您可以联系我们并提交有关可能违反适用法律和内部准则的举报信息。我们处理您的个人数据是为了审查您通过慕贝尔申诉系统提交的举报信息，并调查涉嫌违规行为。在此过程中，我们可能会向您提出其他问题。为此，我们仅通过慕贝尔申诉系统进行沟通。

The corresponding processing of your personal data takes place on the basis of your consent given in the report through the Mubea Grievance System (Art. 6 para. 1 lit. a Data Protection Directive 95/46/EG, GDPR).

对您的个人数据的相应处理是在您通过慕贝尔申诉系统（《通用数据保护条例》数据保护指令 95/46/EG 第 6 条第 1 款 a 项）填报举报信息时给予同意的基础上进行的。

Furthermore, we process your personal data insofar as this is necessary to fulfill legal obligations. This includes, in particular, reports on criminal, competition and labor law violations (Art. 6 para. 1 lit. c GDPR).

此外，我们会在履行法律义务所必需的范围内处理您的个人数据。这尤其包括关于违反刑法、竞争法和劳动法的举报信息（《通用数据保护条例》第 6 条第 1 款 c 项）。

Finally, your personal data will be processed if this is necessary to protect our legitimate interests or the interests of a third party (Art. 6 para. 1 lit. f GDPR). We have a legitimate interest in the processing of personal data for the prevention and detection of violations within the Mubea-Group, to check the legality of internal processes and to safeguard our integrity.

最后，如果有必要保护我们的合法权益或第三方的权益，我们将处理您的个人数据（《通用数据保护条例》第 6 条第 1 款第 f 项）。我们拥有处理个人数据的合法权益，以防止和发现慕贝尔集团内部的违规行为，检查内部流程的合法性并捍卫我们的诚信。

If you disclose special categories of personal data to us, we process these on the basis of your consent (Art. 9 para. 2 lit. a GDPR).

如果您向我们披露特殊类别的个人数据，我们会在您同意的基础上处理这些数据（《通用数据保护条例》第 9 条第 2 款 a 项）。

We also use your personal data in anonymized form for statistical purposes.

我们还将以匿名形式使用您的个人数据，以便进行统计。

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

我们无意将您的个人数据用于上述目的以外的用途。并且我们将事先征得您的同意。

Technical implementation and security of your data

数据的技术操作和安全性

The Mubea Grievance System includes an option for anonymous communication via an encrypted connection. Your IP address and your current location will not be stored at any time when you use the system. After submitting a report, you will receive login data to the protected mailbox of the Mubea Grievance System so that you can continue to communicate with us in a secure manner.

慕贝尔申诉系统包括一个通过加密连接进行匿名通信的选项。当您使用该系统时，您的 IP 地址和当前位置不会被存储。填报提交举报信息后，您将收到慕贝尔申诉系统受到保护的邮箱的登录数据，以便您继续以安全的方式与我们沟通。

We maintain appropriate technical measures to ensure data protection and confidentiality.

The data you provide will be stored in a specially secured EQS database. All data stored in the database is encrypted by EQS in accordance with the current state of the art.

我们采取适当的技术措施来确保数据保护和保密。您提供的数据将存储在特别安全的 EQS 数据库中。存储在数据库中的所有数据均由 EQS 根据当前技术水平进行加密处理。

Transfer of personal data

个人资料的传输

We operate internationally and have locations in various countries within and outside the European Union. Only specially authorized employees of Muhr und Bender KG are permitted to access the stored data. Insofar as this is necessary to fulfil the stated purpose, specially

authorized employees of our subsidiaries may also be entitled to access the data. This is particularly the case if the investigation of your report is carried out in the country concerned. All employees authorized to review data are expressly obliged to maintain confidentiality.

我们在全球范围内运行该系统，并在欧盟境内或境外的各个国家设有办事处。只有经 Muhr und Bender KG 特别授权的员工才能访问存储的数据。在实现所述目的所必需的情况下，我们子公司的特别授权员工也有权访问数据，特别是当对您所举报信息的调查是在有关国家进行的情况。所有被授权审查数据的员工都有明确的保密义务。

In order to fulfill the stated 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.

为了实现所述目的，我们可能还需要将您的个人数据传输给欧盟境内或境外的外部机构，例如律师事务所、刑事或反不正当竞争主管部门。

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 us. 如果我们在集团内部或外部传输您的个人数据，我们将通过内部数据保护规定和/或相应的契约性协议确保统一的数据保护水平。在所有情况下，数据处理的责任仍由我们承担。

Finally, we transfer your personal data to EQS to the extent described above for technical implementation. For this purpose, we have concluded a data processing agreement with EQS to ensure data protection.

最后，我们会在上述范围内将您的个人数据传输给 EQS 进行技术操作。为此，我们与 EQS 签订了数据处理协议，以确保数据得到保护。

Duration of storage

存储期限

We only store personal data for as long as it is necessary to process your report or for as long as we have a legitimate interest in storing your personal data. Data may be stored for longer if this has been provided for by European or national legislation to fulfill legal obligations, such as retention obligations. Thereafter, all personal data will be deleted or anonymized.

我们仅在需要处理您的举报信息时或在存储您的个人数据方面拥有合法权益时存储您的个人数据。如果欧洲或国家立法为履行法律义务（例如留置义务）而有所规定，则数据可能会存储更长时间。此后，所有个人数据将被删除或以匿名形式出现。

Your rights

您的权利

If you have provided personal data, you have the right of information, correction and deletion of the personal data. You can also restrict the processing or request its transfer to another controller.

如果您提供了个人数据，您对个人数据有知情权，有权对个人数据进行更正和删除。您还可以限制其处理或请求将其传输给另一个管理员。

Furthermore, you have the right to object to the processing of your personal data at any time on grounds relating to your particular situation.

此外，您有权随时根据您的特定情况有关的理由对您的个人数据处理提出异议。

You have the right to withdraw your declaration of consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. 您有权随时撤销您的同意声明。撤销同意不影响撤销前基于同意进行数据处理的合法性。

You can assert these rights by sending an informal notification to the controller or our data protection officer named above. If you have asserted the right of rectification, erasure or restriction of processing against us, we are obliged to notify all recipients to whom we have disclosed the personal data concerning you of this rectification or erasure of the data or restriction of processing, unless this is impossible or involves a disproportionate effort. We will inform you about these recipients on request.

您可以通过向上述管理员或我们的数据保护官发送非正式通知来维护这些权利。如果您向我们主张更正、删除或限制处理数据的权利，我们有义务将您的个人数据的更正、删除或限制处理通知所有接收方，除非无法实现或所付出的努力不成比例。我们将根据要求，通知您有关这些接收者的信息。

Finally, without prejudice to any other administrative or judicial remedy, you have the right to submit a complaint to a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

最后，在不影响任何其他行政或司法救济的情况下，如果您认为处理与您有关的个人数据违反了《通用数据保护条例》，您有权向监管机构提出投诉，特别是当其发生在您常住地、工作地点或涉嫌侵权地的成员国的情况。