

## DATA PROTECTION NOTICE - WHISTLEBLOWING

Last Updated: April 2023

The General Data Protection Regulation (the "GDPR") protects natural persons against the misuse of personal data and may cover both manual and electronic records. This Notice details your rights and obligations according to the GDPR in relation to your personal data and the personal data of other individuals that you may submit through the whistleblowing web-based service ("SPEAK UP"). This Notice also applies in case you decide to report a misconduct via other channels provided by Rimac Group from time to time. Before submitting a report you will be required to read and acknowledge receipt of this Notice.

### 1. Who provides the SPEAK UP and Why?

Rimac Group d.o.o., a company located in Croatia, Brezje (City of Sveta Nedelja), Ljubljanska ulica 7 ("Rimac Group") provides this whistleblowing service and has engaged Deloitte GmbH Wirtschaftsprüfungsgesellschaft located in Germany, 40476 Düsseldorf, Erna-Scheffler Str. 2 ("Deloitte") to manage the SPEAK UP on Rimac Group's behalf. Rimac Group is the data controller for the purposes of the GDPR. If you have any questions or concerns about this Notice, please contact our data protection officer at [dpo@rimac-automobili.com](mailto:dpo@rimac-automobili.com).

### 2. Use of the SPEAK UP

The SPEAK UP is a confidential web-based intake system provided by Rimac Group to its employees, vendors, suppliers, business partners and all persons having knowledge about misconducts which are related to the performance of business within Rimac Group ("reporters"). Use of the SPEAK UP is entirely voluntary.

You are encouraged to report possible violations by using the SPEAK UP service. Alternatively, you may also submit your report directly to the national Ombudsperson and/or to the respective facilitator for internal reporting appointed by Rimac Group (contacts of the facilitator are available at Rimac Group Intranet).

Rimac Group will only accept reports through the SPEAK UP service on matters included within the scope of the Croatian Whistleblower Act (Official gazette No. 46/2022) (for example irregularities in respect of accounting, internal accounting controls, auditing or issues relating to bribery, corruption, fraud, theft, etc.). If your concern pertains to a matter outside the scope of the aforementioned act, please contact your supervisor or local management or a representative of the Human Resources or Legal Department.

### 3. What personal data and information is collected and processed?

We will process the following personal data and information when you make a report through the SPEAK UP:

- a. your name and contact details (phone number(s), email address(es));
- b. your department;
- c. location of your work;
- d. your relationship to Rimac Group (external or internal) and all other personal data you include in the report;
- e. to the extent that you provide information about named individuals, the SPEAK UP provides you with the opportunity to submit the following personal data about such individuals:
  - i. name;
  - ii. description of functions and involvement;
- f. a description of the alleged misconduct, including any potential criminal violations;
- g. a description of the circumstances of the incident, including when and where it took place;

- h. any supporting documentation;
- i. any information gathered during verification of the reported facts and a summary of the verification process;
- j. the outcome of the report; and
- k. any other relevant information required to accurately complete or investigate the report or irregularity.

It is not possible to stay anonymous when you submit a report on possible violations via SPEAK UP and you will have to specify your personal information in your report. This is explicitly required under the Croatian Whistleblower Act. All reports, including your details, are treated in confidence. We will only use the phone number and email address you provide when completing your report to contact you regarding your report, if necessary. Your identity can be disclosed only if you consent to it or if necessary and proportionate in accordance with the applicable law (e.g. to those in charge of investigating the report). In the case of personal data submitted by means of a report on the SPEAK UP, any provision of personal data by you is completely voluntary and there are no consequences if you submit a report, provided that the report is submitted in good faith. Please also see Section 8 (Your obligations in relation to the personal data collected and processed) below.

#### **4. How will the personal data and information be processed after you submit your report?**

Rimac Group will use your personal data for a variety of purposes. The table in Appendix 1 sets out those purposes and the legal basis for processing relied upon by Rimac Group to process your personal data.

#### **5. Disclosure of personal data and transfers overseas**

Rimac Group will store the personal data and information you provide in a database operated by Deloitte which is located on servers hosted and operated by Amazon Web Services, Inc. (AWS) in Germany.

Once a report is received, a facilitator for internal reporting will review and investigate it and, if necessary, involve the relevant individuals, including Human Resources, Finance, Internal Audit, Legal, management, external advisors (e.g., legal advisors) etc. Report will be communicated to the management board.

Rimac Group will promptly notify any person who is the subject of a report to the SPEAK UP, except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information.

Depending on the nature or seriousness of the reported misconduct, and where necessary and proportionate, personal data collected in accordance with this Notice will be transferred to the relevant individuals from other companies within Rimac Group of companies. Rimac Group takes all necessary security and legal precautions to ensure the safety and integrity of the personal data we transfer.

Personal data collected through the SPEAK UP may also be disclosed to legal advisors, the police and/or enforcement or regulatory authorities. The relevant bodies that receive and process personal data can be located in another country that may not provide the level of data protection available in the EU.

Rimac Group will keep investigations of reports confidential to the fullest extent possible and in accordance with applicable laws. However, your identity will be disclosed to those investigating the reports so they can follow up with you and ask for further information.

#### **6. Your rights in relation to the personal data collected and processed**

You have certain rights in relation to the personal data we hold about you, unless provided otherwise by Croatian law. To exercise any of your rights, please contact [dpo@rimac-automobili.com](mailto:dpo@rimac-automobili.com).

Some of these only apply in certain circumstances as set out in more detail below. We also set out how to exercise those rights. Please note that we will require you to verify your identity before responding to any requests to exercise your rights. We shall respond to a request by you to exercise those rights without undue delay and at least within one month (although this may be extended by a further two months in certain circumstances).

a. Access. You have the right to know whether we process personal data about you, and if we do, to access data we hold about you and certain information about how we use it and with whom we share it. If you require more than one copy of the data we hold about you, we may charge an administration fee. We may not be able to provide you with certain personal data if providing it would interfere with another individual's rights (e.g. where providing the personal data we hold about you would reveal information about another person) or where another exemption applies.

b. Correction. You have the right to require us to correct any personal data held about you that is inaccurate. Where you request correction, please explain in detail why you believe the personal data we hold about you to be inaccurate or incomplete so that we can assess whether a correction is required. Please note that, whilst we assess whether the personal data we hold about you is inaccurate or incomplete, you may exercise your right to restrict our processing of the applicable data as described below.

c. Restriction of Processing to Storage Only. You have a right to require us to stop processing the personal data we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the personal data, we may use it again if there are valid grounds under data protection law for us to do so (e.g., for the defense of legal claims or for another's protection). You may request that we stop processing and just store the personal data we hold about you when:

- you believe the personal data is not accurate for the period it takes for us to verify whether the data is accurate;
- we wish to erase the personal data as the processing we are doing is unlawful, but you want us to simply restrict the use of that data;
- we no longer need the personal data for the purposes of the processing but you require us to retain the data for the establishment, exercise or defense of legal claims; or
- you have objected to us processing personal data we hold about you on the basis of our legitimate interest and you wish us to stop processing the personal data whilst we determine whether there is an overriding interest in us retaining such personal data.

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at [dpo@rimac-automobili.com](mailto:dpo@rimac-automobili.com) and we will endeavor to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with a relevant data protection supervisory authority.

## 7. Data Retention

Your personal data will be retained in accordance with the retention periods set out in Appendix I.

In the following circumstances, your personal data will be retained for longer than the specified periods:

- i. as required by law or court order; and/or
- ii. as needed to defend or pursue legal claims.

## 8. Your obligations in relation to the personal data collected and processed

It is important that changes in your personal data (name, contact details, employee role and function) are updated as soon as possible by contacting your local office Human Resources Department.

Please be aware that the information and personal data that you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from the Rimac Group for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated.

## 9. Changes to this Notice

If we make any material changes to this Notice, we will post the updated data protection notice at RIMAC GROUP SPEAK UP. Please check this page frequently to see any updates or changes to this Notice.

### Appendix 1

Purpose of Use	Categories of Personal Data processed for each purpose	Legal Basis for Processing	Retention Period
To investigate the complaint, review compliance against company policies and procedures and applicable laws/regulations and decide on whether to take any further action (including disciplinary action); providing feedback on the status of the complaint, and generally to prevent and repress the misconducts.	Your name and contact details (phone number(s), email address(es)); the name of your employer, your department; location of your work your relationship to Rimac Group (external or internal) and all other personal data you include in the report; to the extent that you provide information about named individuals, the SPEAK UP provides you with the opportunity to submit the following personal data about such individuals: <ul style="list-style-type: none"> <li>o name; and</li> <li>o description of functions and involvement.</li> </ul> a description of the alleged misconduct, including any potential criminal violations; a description of the circumstances of the incident, including when and where it took place; any supporting documentation; any information gathered during verification of the reported facts and a summary of the verification process;	Legal obligation	If no additional investigation was conducted following the initial assessment, the Personal Data shall be deleted without delay. If an additional investigation was carried out but was finally decided that no misconduct has taken place, the Personal Data will be kept for no longer than one year after the investigation on the misconduct is closed. If an additional investigation was carried out and it was determined that a misconduct has taken place and remedial actions were imposed, the Personal Data included in the report will be kept for no longer than five years after the investigation on the misconduct is closed.

	the outcome of the report; and any other relevant information required to accurately complete or investigate the report or irregularity.		
--	--	--	--