

## PRIVACY NOTICE

### Reporting system

Stadler is a system provider of mobility solutions in railway vehicle construction, service and signalling technology. This Privacy Notice informs you about the processing of personal data by the company of the Stadler Group listed below (hereinafter “Stadler”, “we” or “us”) in connection with the use of the Reporting system.

### 1. Controller, point of contact and data protection officer

The controller responsible for data processing is the Stadler company affected by the reported case. The point of contact for cases reported via the reporting system is:

**Stadler Rail Management AG**

Ernst-Stadler-Strasse 1  
9565 Bussnang  
Tel: +41 71 626 21 20

The data protection officer for the Stadler Group can be reached at: [compliance@stadlerrail.com](mailto:compliance@stadlerrail.com)

### 2. Personal data processed, purpose of data processing and its legal basis

We process personal data that you provide to us in your report and during the course of the investigation (first name, last name, department, position and, if applicable, behavior of you and the people involved in the case; depending on the case, other data categories may be added).

We process your personal data to determine the identity of the people involved, to investigate reported events, to ask questions and to provide feedback. As a legal basis for processing, we rely on the legal obligation to investigate and document the reported cases and on the legitimate interest in preventing crimes.

### 3. Transfer of data to third parties

The personal data processed in connection with the compliance reports is strictly confidential. Within the company, only people who are entrusted with investigating the reports have access to this data. We only pass on the data to third parties to the extent that this is necessary to achieve the purposes stated in Section 2 or to protect our legitimate interests or if it is required by law. The third parties to whom we pass on data or who may have access to the data through their services include, in particular:

- providers of IT services, hosting, support in Switzerland and in Europe
- Other companies in the Stadler Group, if they are affected by the report
- domestic and foreign authorities and offices, courts, arbitration courts
- Counterparties in connection with legal proceedings

If and insofar as we use a third party for the performance of a contract with you, your personal data will only be disclosed to the third party to the extent that this is necessary for the corresponding performance.

If data is transferred to a country that does not have an adequate level of data protection, the data will be protected accordingly, in particular by means of standard contractual clauses approved by the European Commission and recognized by the Federal Data Protection and Information Commissioner.

## 4. Retention period

Personal data in connection with the investigation of Compliance Reports will be deleted 10 years after the investigation has been completed.

## 5. Your rights

To the extent provided for by applicable data protection law, you have the right to request access to your personal data, to require that your data be rectified or completed, to have processing restricted or data erased, and to receive your data in a structured, commonly used and machine-readable format in order to transmit this data to another location (data portability).

Furthermore, you may object to the processing of your personal data if we are not obliged to process it for the performance of a contractual or legal obligation. If processing of your data is based on your consent, you may, at any time, withdraw it. Please note that the withdrawal of your consent will not affect the lawfulness of previous processing.

Your rights may be restricted, in particular if the exercise of your rights conflicts with the performance of our legal or contractual obligations, or where we can demonstrate a legitimate interest in processing, or the rights of third parties would be infringed.

If you would like to exercise your rights, please use the address in clause 1 to contact us.

If you believe your rights have been infringed, you may, at any time, lodge a complaint with the competent supervisory authority. In Switzerland, this is the Federal Data Protection and Information Commissioner

(<https://www.edoeb.admin.ch/edoeb/en/home.html>).

## 6. Changes

We reserve the right to amend this Privacy Notice at any time. The current version of this Privacy Notice is published on our website at [Privacy Notice - Stadler \(stadlerrail.com\)](#).