

## Stäubli Personal Data Protection Policy – Whistleblowing

The Stäubli Personal Data Protection Policy – Whistleblowing provides information about how STÄUBLI collects, stores and processes personal data when an individual files a report into the Whistleblowing system available on the website: [SpeakUp](#).

### 1 Who is responsible for processing personal data?

The Controller (“STÄUBLI”) responsible for processing personal data in relation to a whistleblowing report is Stäubli International AG and its affiliates depending on the location where the suspected wrongdoing occurred and the reporting channel that is selected to make a whistleblowing report. The existing channels are as follows:

- **Stäubli Group (STÄUBLI International AG for all other Stäubli entities)**
- **Stäubli Faverges SAS**
- **Stäubli Corporation USA**
- **Stäubli Tec-Systems GmbH**
- **Stäubli Hangzhou**

### 2 What personal data do we collect?

STÄUBLI will collect, store, and process personal data obtained directly through the Whistleblowing System and/or indirectly during the investigation phase. The personal data we may process can be of various types, including:

- **Identification data:** such as your name (if you choose to disclose your identity), location, contact details (email address, phone number), and data about third parties if relevant to the alert.
- **Professional data:** such as email content, job position, job title, job level, hire date, and work background.
- **Economic and financial data:** such as controlling ownership in a company.
- **Social circumstances:** such as personal connections, for the purpose of declaring conflicts of interest.

Whistleblower can only provide sensitive personal data (such as criminal convictions, health, political opinions, sexual preference) if it has a direct link with the suspected wrongdoing.

### 3 Why is personal data processed and what is the legal basis?

STÄUBLI processes personal data through its whistleblowing system:

- to ensure compliance with applicable whistleblowing and anti-retaliatory laws and regulations,
- to enable individuals to report suspected wrongdoing or risk of wrongdoing and ensure appropriate follow-up actions,
- to assess the facts and circumstances reported and to conduct investigations where necessary,
- to detect and address serious misconduct that violates applicable laws, the Stäubli Group Code of Conduct or other internal policies.

The legal basis for processing is either:

- **to comply with legal obligations.** In certain countries, STÄUBLI is required to implement a Whistleblowing system that enables individuals to report concerning or unlawful conduct, as outlined in our Whistleblowing Policy.
- **to pursue STÄUBLI’s legitimate interests.** The Whistleblowing system also facilitates the reporting of serious misconduct that may violates applicable laws, the Stäubli Group Code of Conduct or other internal policies.

#### **4 How long will personal data be retained?**

Personal data collected and processed in relation to a report will be kept only as long as necessary for the handling of the investigation.

If no action is taken following a report that falls within the scope of the system, the related data will be retained for a period of 6 years from the closure of the verification process.

Where disciplinary or legal proceedings are initiated against the person implicated or the author of a malicious report, personal data related to the report will be retained until the conclusion of the proceedings or the expiration of the appeal period.

Personal data may be retained for a longer period in intermediate archiving if the data controller is legally required to do so or wishes to preserve evidence in case of litigation, within the applicable limitation or foreclosure period.

#### **5 With whom do we share personal data?**

Recipients of personal data will be the internal teams in charge of receiving the reports and/or conducting investigation. Personal data may also be shared with external advisors.

Additionally, personal data may also be transmitted to the competent authorities, at their request, or to comply with other legal obligations to which STÄUBLI may be subject.

The management system for our whistleblowing system is hosted within the European Union.

#### **6 Your Rights**

In accordance with the applicable data protection legislation, you have the right to access, correct, or update your personal data. In some cases, you have the right to request the erasure of your personal data or restriction of its use.

In order for us to process your request, you must provide elements required to identify you and state the purpose of your request to [data.privacy@staubli.com](mailto:data.privacy@staubli.com). You have the right to lodge a complaint to the competent supervisory authority responsible for the protection of personal data.

#### **7 Security and Confidentiality**

Stäubli is committed to protecting your personal data and maintaining its quality, integrity, and confidentiality. Stäubli therefore allows access to your personal data solely to employees (or external advisors) who need to consult it as part of their roles. These employees are subject to confidentiality agreements concerning processed personal data and are aware of the risks and obligations related to processing personal data. Stäubli has also implemented physical, electronic, and administrative safeguards to protect your personal data.

#### **8 Cookies**

When using the SpeakUp® web, session cookies are used to provide secure communication. This session cookie data are collected by our provider People InTouch B.V. It will be deleted after two (2) hours. These cookies are necessary for SpeakUp® to function. Legally, these cookies are exempted from the cookie consent requirement. Therefore, SpeakUp® does not ask for your permission to use these cookies but does inform you about their use. For further information please consult SpeakUp cookies policy available on the platform.

## **9 Updates to the Personal Data Protection Policy**

From time to time, we may update this Stäubli Personal Data Protection Policy – Whistleblowing. When we do, we will publish the changes. If material changes are made to this Policy, we will notify by placing a prominent notice on the website.

## **10 Contact**

For any question regarding Stäubli Personal Data Protection Policy – Whistleblowing, please do not hesitate to contact us at: [data.privacy@staubli.com](mailto:data.privacy@staubli.com).