# **Whistleblowing Privacy Notice**

### **Purposes of Data Processing**

Maltego Technologies GmbH has implemented the whistleblower system to report suspected violations of law or internal company policies in a secure and confidential manner.

Maltego Technologies GmbH shall process your personal data for purposes of compliance with regulatory obligations, laws and provisions of authorities legitimated by law.

#### Legal Basis for Data Processing

Article 6 (1) (c) General Data Protection Regulation (GDPR)

#### **Categories of Data Subjects**

- Whistleblower
- Persons mentioned in the reports

#### **Categories of Personal Data**

If a report has been submitted anonymously, no personal data is processed. In all other cases, the following personal data is processed, if provided:

- First Name and Last Name
- E-mail Address
- Phone Number
- Address
- Any Personal data provided regarding other persons

#### **Categories of Recipients**

- Whistleblowing Investigations Team
- Management

Personal data is not being transferred to third countries.

#### Deletion

Whistleblowing disclosures, including your personal data, will be deleted if it is no longer required for the purposes stated in this Privacy Notice. However, statutory retention obligations or legitimate interests of Maltego Technologies GmbH may justify longer storage of your data. For example, Maltego Technologies GmbH may continue to retain your data during current litigation, which is the result of possible investigations.

Collected data unrelated to suspected violations of law or internal company policies will be immediately deleted.

# **Data Retention**

The retention periods are determined on a case-by-case basis. Collected data shall be processed in the paper and computer archives of Maltego Technologies GmbH for a period of time not exceeding that necessary to achieve the purposes for which they are collected and for the longer period of time possibly necessary to comply with legal provisions and/or for judicial protection, subject to ordinary statutes of limitation.

Therefore, collected data may be stored for an extended period, in accordance with relevant statutory data retention periods, in the following circumstances:

- Criminal, civil or disciplinary proceedings; or
- Bringing or defending against legal claims.

## Your Rights

The following rights regarding your personal data can be exercised at any time in accordance with the General Data Protection Regulation (GDPR):

- Right to be informed (about how personal data is collected and processed)
- Right to access
- Right to rectification
- Right to deletion ("right to be forgotten")
- Right to restriction of processing
- Right to object
- Right to withdraw consent
- Right to appeal to a data protection supervisory authority

#### **Responsible Party**

Maltego Technologies GmbH, Paul-Heyse-Str. 29, 80336 Munich, Germany

#### Contact:

**Data Protection Officer** 

dataprotection@maltego.com