



Data Protection Notice – SMA Speak-Up Line

- General
- Use of the SMA Speak-Up Line
- What types of personal data and information will be collected and processed?
- How will personal data and information be processed after the report and who has access to it?

1. General

The Data Protection Declaration available on the SMA corporate website, which regulates topics such as cookies and user rights, shall apply. The purpose of this Data Protection Notice is to explain in more detail essential data protection aspects with regard to the SMA Speak-Up Line.

The SMA Speak-Up Line is a web and telephone-based offering from SMA Solar Technology AG to its employees, suppliers, customers and business partners to report the non-compliant behavior of SMA's employees, suppliers, customers and business partners.

The SMA Speak-Up Line is provided by SMA Solar Technology AG, Sonnenallee 1, 34266 Niestetal, Germany. The web pages and phone service through which you may report a violation of laws, regulations or SMA internal guidelines as well as the database in which the personal data and information that you report are stored, are operated by People Intouch B.V., Olympisch Stadion 41, 1076 Amsterdam, Netherlands ("People Intouch") on behalf of SMA Solar Technology AG.

2. Use of the SMA Speak-Up Line

The use of the SMA Speak-Up Line is voluntary. Please note, however, that we are only able to receive and process reports if you confirm that you have read and taken note of this Data Protection Notice and consent to the processing of the reports as described herein. We therefore kindly ask that you consent by ticking the box "I confirm that I have read and accepted the terms and conditions outlined within the Data Protection Notice." If you do not consent to the processing of the reports as described herein, the system will not allow you to file a report. In such a case, you are of course welcome to contact the SMA Group Compliance department directly, for example by telephone.

3. What types of personal data and information will be collected and processed?

If you report an incident through the SMA Speak-Up Line, we will collect the following personal data and information:

- your name, contact details and relationship to SMA if you provide such information,

- the name and other personal data of the persons you name in your report if you provide such information (e.g. description of functions, contact details),
- any other information provided by you that is material to the investigation, in particular a description of the misconduct and circumstances of the incident, including the time and place, whether management has knowledge of the incident and whether you wish to make your report anonymously.

4. How will personal data and information be processed after the report and who has access to it?

Any personal data and information that you report to us will be stored in the SMA Speak-Up Line database, which is hosted and operated by People Intouch in the Netherlands. For the purpose of processing your report, the personal data and information will be transferred from People Intouch to SMA Solar Technology AG in Germany. SMA Group Compliance will evaluate the information provided, conduct preliminary investigations if applicable and may initiate further investigations through SMA Corporate Internal Audit or other departments. If further steps are required during the investigation, the personal data and information may be accessed, processed and used by relevant SMA Solar Technology AG personnel, including Human Resources, Corporate Internal Audit, Legal Services or Compliance & Governance, as well as external consultants (e.g. legal advisors).

Personal data and information may also be disclosed to the police or other law enforcement or authorities.

The personal data you provided will be kept as long as it is necessary to process your report, or, if applicable, as long as it is necessary to initiate sanctions or if the data needs to be kept for legal reasons. Otherwise data will be deleted within three months after closing the report.