



Privacy Policy for Internal Investigations

All business activities of OMV Aktiengesellschaft or its respective relevant group company (hereinafter referred to as "OMV") must be carried out in accordance with applicable laws and in compliance with all internal company regulations. Since violations of legal and internal regulations are likely to cause damage to the company, OMV attempts to counteract such risks with various compliance measures. The measures to be taken in this context (including internal investigations) are intended to prevent and clarify risks resulting from possible violations as quickly and efficiently as possible, but also to prevent future violations, to ensure the efficiency of company processes and the economical use of company resources. In this context, it is possible that personal data about you will be processed.

This privacy policy informs you about the details of the processing of your personal data in connection with measures by Compliance and/or Internal Audit. The data processing is carried out on the basis of and within the framework of the applicable data protection provisions (in particular the General Data Protection Regulation - GDPR). Separate privacy statements are available for individuals using our in-house whistleblowing platform (<https://omv-group.integrityplatform.org/?action=displayPlain-File&fileId=10>).

A. WHO IS RESPONSIBLE FOR DATA PROCESSING?

Data Controller is

OMV Aktiengesellschaft
Trabrennstraße 6-8
1020 Vienna
Phone: +43 (1) 40440-23696

or the relevant group company of the OMV Group (an overview of our group companies can be found on our OMV website)

If you have any questions, please feel free to contact our data protection officer

Manfred Spanner, MSc.
E-mail: privacy@omv.com

B. FOR WHAT PURPOSE AND ON WHAT LEGAL BASIS ARE YOUR PERSONAL DATA PROCESSED?

In order for the company to operate within a legally compliant framework and thus in accordance with legal and internal regulations, it may be necessary to conduct internal investigations and compliance checks. This may require the processing of your personal data.

We process your personal data in order to prevent potential violations. Such violations may arise, for example, in the areas of criminal, antitrust, tax or labor law. For this purpose, logging and examination of e-mail traffic, calendar entries or the review of data and documents stored on company IT systems and devices may take place in compliance with the principle of data



minimisation. Data obtained from third parties (e.g. authorities, whistleblowers) may also be checked and processed.

Your personal data will be processed in particular for the following purposes:

- to clarify misconduct (e.g. violations of labor, criminal, antitrust or tax law, etc.),
- in order to eliminate deficiencies within the company (e.g. checks to identify/clear conflicts of interest),
- to determine appropriate measures concerning the avoidance of (contractual or legal) violations of law or guidelines,
- To clarify specific cases of suspicion in individual cases (also to protect employees who are wrongly suspected) and
- to secure and subsequently assert legal claims.

In this context, we base the processing of your personal data on our overriding legitimate interest pursuant to Art 6 (1) (f) GDPR. Our legitimate interest is to avoid violations of legal prohibitions as far as possible and to increase the quality of our compliance measures for the purpose of establishing compliant business operations.

In addition, processing may also be carried out for reasons of contract performance pursuant to Art. 6 (1) (b) GDPR or in the context of the fulfillment of legal obligations pursuant to Art. 6 (1) (c) GDPR.

C. WHICH PERSONAL DATA ARE PROCESSED?

We may process the following personal data as part of taking appropriate compliance measures:

- Name
- Function or role in the company
- Case-related information (description of facts or incidents, concrete suspicion)
- Evidence (access logs, emails, calendar entries, notes, saved documents, and other relevant content)
- Sender as well as recipient of e-mails

D. TO WHOM DO WE TRANSMIT YOUR PERSONAL DATA?

We will only pass on your personal data if this is necessary to fulfill contractual obligations, if we are legally obliged to do so, if there is a legitimate interest in passing on the data or if you have given your consent. In any case, we will only share your data to the extent necessary to achieve the respective purpose.

Since OMV has several group companies, we transfer personal data, if necessary to achieve the purposes stated above, to other companies in our group.

In addition, your personal data may be transferred to the following recipients or external service providers, as applicable:

- Public authorities (e.g. social insurance agencies, tax authorities, labor authorities, courts, public prosecutor's office, etc.)



- Tax consultant and auditor
- External IT experts
- Lawyers
- Other comparable professionals

E. WILL YOUR PERSONAL DATA BE TRANSFERRED TO A THIRD COUNTRY?

Since companies of the OMV Group as well as external service providers of OMV are located both inside and outside the European Union (EU), it may be necessary to transfer your data to a data recipient outside the EU.

Therefore, to the extent that recipients are located in third countries, data transfers are only made in compliance with appropriate safeguards for the protection of personal data. For this purpose, OMV has concluded within its group of companies and, if applicable, with external service providers the standard contractual clauses for international data transfers ("SCC") provided by the EU Commission.

F. HOW LONG DO WE STORE YOUR PERSONAL DATA?

Your personal data will only be stored for as long as it is required to fulfill the purposes, in particular for the compliance measures mentioned in this privacy policy. In this context, your personal data will be stored for as long as it is necessary for the respective audit and control. This includes storage for documentation purposes.

In addition, your personal data will be stored as long as it is required for the purpose of documentation as well as for legal prosecution and the duration of the respective proceedings. Otherwise, the data will be deleted two months after the end of the investigation.

Insofar as personal data is required to fulfill tax and commercial law retention obligations (e.g. Federal Fiscal Code and Commercial Code), it will be stored for 7 years from the end of the respective calendar year.

G. WHICH DATA PROTECTION RIGHTS DO YOU HAVE?

As a data subject, you have the following rights with regard to the processing of your personal data:

Right to information

You can request information about the data processed about you, in particular about the origin and categories of the data processed, the storage period, the recipients to whom your personal data are disclosed or have been disclosed, the purpose or nature of the processing. Upon request, we will provide you with a copy of the personal data we process about you.

Right to rectification

If we process data about you that is incorrect or incomplete, you may request that it be corrected or completed - also by means of a supplementary declaration.

Right to deletion



You have the right to request that we delete your personal data. We will delete your data if this is provided for by law (Art 17 GDPR). We would like to point out that a right to deletion does not exist in particular if we have to process the data in order to fulfill a legal (retention) obligation or in order to be able to assert, exercise or defend against legal claims.

Right to restriction of processing

If it is unclear whether the data processed about you is inaccurate, incomplete or being processed unlawfully, you may request that we restrict the use of your personal data.

Right to object

Even if the data relating to your person is correct and complete and is processed by us lawfully, you may object to the processing of this data in individual cases justified by you.

Right to data portability

If we process personal data about you that you have provided to us, you may, under certain circumstances, request that this data be transferred to you in a machine-readable format. You may also instruct us to transfer this data directly to a third party of your choice, if this is technically feasible.

Right to revoke consent

Insofar as we process your data on the basis of your consent, you are entitled to revoke your consent at any time. Please note that such revocation does not affect the lawfulness of the data processing carried out on the basis of the consent until the revocation.

Right to complain

Although we do our best to protect the privacy and integrity of your data, disagreements about the way we use your data cannot be excluded. If you believe that the processing of your data violates the GDPR, you are free to lodge a complaint with the competent supervisory authority, the Austrian Data Protection Authority, Barichgasse 40-42, 1030 Vienna