

Privacy Notice

Last updated: January 19, 2024

This Privacy Notice describes how your personal data, including sensitive data, is collected, and processed, related to the Speak Up Platform. The Speak Up platform is a way for employees, contract staff and external parties to report a suspected wrongdoing by or involving a Sonova Company, employee or contractor staff that is in violation of the Sonova Code of Conduct and/or its policies or other local or international legislation.

The processing of your personal data complies, according to your country, with local data protection requirements, including the Swiss Federal Data Protection Act ("FDPA"), the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("GDPR"), and / or, as may be applicable, the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") for your personal data qualified as Protected Health Information.

1. Who we are

Sonova AG is incorporated under the laws of Switzerland with its registered address at Laubisrütistrasse 28, 8712 Stäfa, Switzerland. Sonova AG, acts as a data controller, and is operating its business through its globally located affiliates (collectively referred to as "Sonova" or the "Company" or "we" or "our"), acting as independent or joint data controllers regarding their employees where legally required.

2. Personal data we collect from you and why

In the event you freely decide to raise a matter directly through the SpeakUp platform that is available via phone, web or mobile intake the following personal data will be processed:

- Name, surname and contact details of reporter (should you wish to disclose these to us).
- Name, surname, title and contact details of individuals that you mention in your SpeakUp report.
- Any other data provided within the description of potential misconduct. In this regard, in order to comply with the Data protection principle of data minimization, please only type in the necessary information you need report any suspected violations. Please do not type in more information than necessary or unnecessary information about you or other individuals. Consider this especially when you want to provide any data falling within special category/sensitive data (any data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sex life or sexual orientation).
- In exceptional cases such as conflict of interest topics names and other identifiers of family members and relatives could be collected.
- Where necessary to report and investigate the suspected violations, special categories of personal data may be processed. This category may include personal data related to racial or ethnic origin, political, religious, or philosophical beliefs, health details, information about a person's health, sex life or sexual orientation.

We process the above-mentioned personal data for the following purposes:

- Management of the SpeakUp process: Sonova is committed to conducting its business with integrity and fairness, in an ethical manner and in compliance with its Code of Conduct, Sonova Values and other policies as well as in compliance with applicable laws and regulations. Therefore, Sonova will process provided personal data in order to assess and follow-up on submissions to the Speak Up platform, investigate alleged violations, and adopt any necessary

measures, as well as to provide feedback to questions and queries you have raised regarding corporate compliance.

- Provision of anonymous statistical reports for our Company's management.

The above-listed processing of personal data is necessary to comply with legal obligation (art. 6, para. 1, lit. c GDPR) and to comply with public interest for the processing of special categories of personal data, including health data and judicial data (art. 6, para. 1, lit. e) and art. 9, para 2, lit. g GDPR). In addition, this activity is also performed based on Sonova's legitimate interest to protect its assets, rights, and interests as well as the proper performance of company activities in compliance with current regulations, legal obligations, and internal policies.

Furthermore, where legally permitted, the SpeakUp platform also ensures the anonymity of the reporter, if the reporter wishes to remain anonymous.

3. How we share your personal data

Your personal data will be processed according to the instructions we provide to our employees who have received the necessary training in data protection and are subject to an obligation of confidentiality.

Your personal data may also be disclosed to:

- Other companies in our group of companies, such as our subsidiaries, all of which are required to protect personal data in accordance with applicable privacy and data protection laws;
- Our business partners, contractors and third-party service providers. These third parties only process personal data that are strictly necessary for the services they provide to us, according to our instructions and in compliance with our privacy and security requirements.
- Other organizations and public bodies, supervisory and control authorities, including law enforcement agencies, as may be required by law.

The SpeakUp platform is provided by NAVEX Global UK Limited, appointed as Data Processor.

Before we disclose any personal data to other third parties than those listed above, we will explicitly ask you for your consent. However, if we are obliged to disclose personal data without your consent, we will only disclose personal data that are strictly necessary for that purpose to fulfil our legal obligations.

4. International personal data transfers

Please note that some of the above-mentioned third parties can be located outside your country. Therefore, your personal data may be transferred to countries that do not provide the same level of protection of personal data as your own country. In such cases, we undertake to:

- implement adequate procedures to comply with applicable law;
- adopt appropriate organizational, technical and legal safeguards in order to ensure an adequate level of protection of the personal data transferred;
- implement, if necessary, and according to applicable law, standard contractual clauses as adopted by the European Commission;
- depending on the country of the importing third party, take additional measures such as a transfer impact assessment.

5. How long we keep your personal data

Sonova will retain your personal data for a minimal period proportional to the time required to fulfil the purposes outlined in Section 2. Your personal data is retained for 3 years after the closure of the investigation/starting from the communication of the outcome of the SpeakUp procedure.

In the event applicable law or other regulations require a longer retention period or in the event personal data is required for claim or litigation purposes or because of competent authorities' requests, we will apply the longer retention period to fulfill our legal obligations.

6. Your legal rights

Within the framework of the collection and processing of your personal data, and as per applicable law, you may have the right to request access, rectification, erasure of your personal data, or restriction of processing. In addition, you may object to the processing, request data portability, and withdraw your consent at any time. According to your country, you may have other rights such as providing instructions for how your personal data should be processed posthumously. Under HIPAA you may also have the right to request an accounting of disclosures of your personal data, and the right to receive a paper copy of this notice upon written request.

Please note that the exercise of such rights is subject to the limitations provided by applicable law.

You may exercise your rights by contact us at privacy@sonova.com.

If you consider that the processing of your personal data infringes applicable law, then you may also lodge a complaint with the local supervisory authority or the competent regulator.

7. How to contact us

In the event of questions about this Privacy Notice, or the processing of your Personal Data, please contact our Data Privacy Team at privacy@sonova.com.