



Data Protection Notice
*regarding the ADA Whistleblowing
System*

Vienna, 2026



Introduction

This notice provides information on how the Austrian Development Agency, a company with limited liability, registered in the Companies` Register at the Commercial Court Vienna under FN 243529g, having its registered office in Vienna and its business address at Zelinkagasse 2, 1010 Vienna, Austria ('ADA'), will process your personal data within its Whistleblowing System.

Purposes for which ADA processes your personal data, data categories processed and legal basis

Purposes

Corruption, misuse of funds and other unlawful acts are harmful for Development Cooperation - particularly in relation to grants and services. The Whistleblowing System allows the reporting of perceived serious violations. ADA processes your personal data to prevent, deter and/or investigate such violations.

ADA requires your data to effectively operate the Whistleblowing System.

The provision of personal data – unless agreed otherwise – is entirely voluntary. However, if you do not provide this data

- the effective investigation of the reported violation may be impeded or forestalled;
- further communication with you may be impossible.

Data categories processed

ADA processes the following data categories:

- Identifying data (name, date of birth);
- Contact details (address, e-mail address, telephone number);
- Professional function within and outside the company;
- Description of the facts of the case and relevant data relating to the facts of the case, including, if applicable, special categories of personal data and data on criminal convictions and offences;
- Description of the relationship between the persons involved and the alleged facts;
- Correspondence with the persons investigated, whistleblowers, and other persons involved;
- Data on any follow-up measures (e.g. investigations).

Legal basis for processing

ADA processes your personal data on the basis of

- Article 6(1)(c) GDPR (compliance with a legal obligation to which the controller is subject);
- Article 6(1)(e) GDPR (performance of a task carried out in the public interest), namely interest in the fulfilment of the tasks and duties under Sections 8 and 9 of the Federal Act on Development Cooperation (EZA-G);
- Article 6(1)(f) GDPR and Section 4 Para 3 Nr 2 DSG (legitimate interests pursued by ADA or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject), namely the interest in preventing, deterring and/or investigating serious violations, particularly in the context of grants and services, and the interest in the lawful use of funds; and
- if special categories of personal data are concerned, also on the basis of Article 9(2)(f) GDPR (establishment, exercise or defence of legal claims) and Article 9(2)(g) GDPR (processing for reasons of substantial public interest on the basis of Member State law),

in each case, in conjunction with Section 8 HSchG and Section 8 and 9 (1) Federal Act on Development Cooperation (EZA-G), and, as far as personal data of ADA employees are concerned, also Article 88 GDPR and the relevant company agreement.

Recipients or categories of recipients of personal data, including transfer to third countries or international organisations

ADA transfers personal data to:

- External Ombudsperson: Paulitsch Rechtsanwalts GmbH, Hoher Markt 8-9/2/10, 1010 Vienna, Austria, www.paulitsch.law/ombudsperson-ada/en.
- third parties engaged by the ADA or the Ombudsperson on the basis of their professional expertise;
- whistleblowers and witnesses, if necessary for the clarification of the facts;
- courts and public authorities;
- EQS Group GmbH, Siebensterngasse 31/8, 1070 Vienna, Austria, as the processor for the operation of the electronic whistleblowing portal, and its subcontractors;
- Reisswolf Österreich GmbH as processor for the destruction of physical documents;
- Microsoft Corporation as processor when using of e-mail.

If, in individual cases, personal data is transferred to recipients outside the European Union/European Economic Area or to international organisations (in particular when legal advice and representation on site is sought), appropriate guarantees as defined in Articles 44 et seq. GDPR will be respected, unless the transfer is not based on an exceptional case in accordance with Article 49 GDPR.

Data source

Personal data is transferred to ADA by the whistleblower. Any relevant information which is provided will be followed up by an investigation of the case circumstances by the ADA Integrity Team or the External Ombudsperson. If necessary, the Integrity Team or the Ombudsperson may also call upon the technical expertise of other ADA employees or external third parties; reporting persons and witnesses may also be questioned. These persons may also be sources of the personal data processed by ADA within the Whistleblowing System.

Retention period

Personal data collected under the Whistleblowing System will only be kept for as long as necessary in the specific case. If a report is classified as not relevant, further processing is prohibited. Personal data that are not required for the processing of a report are not collected or are deleted immediately if they were collected unintentionally.

Personal data will be stored for five years from the last time it was processed or transmitted, and beyond that for as long as is necessary to pursue administrative or judicial proceedings that have already been initiated or investigative proceedings pursuant to the Austrian Code of Criminal Procedure (StPO). After the obligation to retain data has expired, personal data will be deleted.

Rights of data subjects

Data subjects have the following rights under the GDPR:

- You have the right to receive information about what kind of data about you is being processed (Art. 15 GDPR);
- If inaccurate personal data is being processed or processing is not in accordance with the law, you have the right to demand rectification (Art. 16 GDPR);
- Provided the legal conditions are met, you can request erasure or restriction of processing of your personal data, or object to processing on the grounds of legitimate reasons (Art. 17, 18 and 21 GDPR);
- You can withdraw previously granted consent at any time with effect for the future. Such withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal;
- Provided the legal conditions are met, you have the right to request data portability (Art. 20 GDPR).
- You have the right to file a complaint with the competent authority (Art. 77 GDPR).

If you claim any of your rights under the GDPR, ADA will assess whether the legal conditions for such claim are met. A more detailed information about the rights of data subjects can be found in the ADA Data Protection Declaration under "XII Rights of the Data Subject" (www.entwicklung.at/en/privacy-notice).

Within the scope of the HSchG these rights are not applicable if the conditions of Section 8 paragraph 9 HSchG are met and if invoked by a person who is referred to in a whistleblower report as a person to whom a breach is attributed or with whom that person is associated.

Contact details

If you have any questions or issues concerning the processing of your personal data, please contact:

Name and contact details of the controller

Austrian Development Agency, Zelinkagasse 2, 1010 Vienna, Austria Tel: + 43 (0)1 90399 - 0
Fax: + 43 (0)1 90399 - 2290
Email: office@ada.gv.at Website: entwicklung.at

Contact details of the data protection officer

Austrian Development Agency, Data Protection Officer, Zelinkagasse 2, 1010 Vienna, Austria Email: dpo@ada.gv.at

