

### **Introduction**

The protection of your personal data is a matter of great importance to us and a high priority for our company. Adherence to these legal stipulations is a matter of course for us.

The following information provides an overview of how we process your personal data and your rights under data privacy law.

#### **1. Who is responsible for data processing?**

Particularly responsible for data processing is the Schaeffler Versicherungs-Vermittlungs GmbH and Schaeffler AG and all companies in which the Schaeffler AG directly or indirectly holds a majority stake (Schaeffler Group).

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You can contact our company's data protection officer at:

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Data Privacy Officer  
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91074 Herzogenaurach (Germany)

Tel.: +49 9132 82 1476

Fax: +49 9132 82-5901

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#### **2. For what purpose do we process your data (purpose of processing) and what is the legal basis for this?**

We process your personal data in accordance with the terms of the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG):

##### **Subject to your consent (article 6, paragraph 1a of the GDPR)**

If you have given your consent for us to process personal data for specific purposes, it is lawful for us to process these data based on your consent. A declaration of consent that has been made can be revoked at any time. Please note that this revocation only applies for the future. Data processing that took place prior to the revocation remains unaffected.

##### **In order to fulfill contractual obligations (article 6, paragraph 1b of the GDPR)**

Data is processed as part of the implementation of contracts or at your request for the purpose of carrying out pre-contractual measures.

The purpose of data processing is dependent on the respective contract documents and the object of the contract. The following types of contracts are relevant

- Employment contract
- Insurance Contract

### **Subject to legal regulations (article 6, paragraph 1c of the GDPR)**

The processing of your personal data is proscribed in the following legal standard:

- Insurance Contract Act

### **As part of the balancing of interests (article 6, paragraph 1f of the GDPR)**

If necessary, we will process your data for the purpose of protecting our own legitimate interests or those of third parties. Our legitimate interests include the following in particular:

- Interests of third persons (e.g. loss adjustment)
- Interests of Schaeffler (e.g. compliance with internal rules, insurance of the employees)

### **We only process special categories of personal data<sup>1</sup> under the following conditions:**

#### **Subject to your consent (article 9, paragraph 1a of the GDPR)**

If you have given your consent for us to process personal data for specific purposes, it is lawful for us to process these data based on this consent. A declaration of consent that has been made can be revoked at any time. Please note that this revocation only applies for the future. Data processing that took place prior to the revocation remains unaffected.

### **3. What data relating to me will be processed?**

We will process the following data or categories relating to you:

- Contract data (e.g. kind of work, payment, period of employment etc.)
- Personal data (e.g. family status, religion, maintenance obligation, indicated restraints etc.)
- Contact data
- Customer data
- Health data

### **4. From what sources do my data originate?**

We have received your data from you personally. [For employees]: Additionally, we receive data from third parties such as tax authorities (income tax class) or operational pension portal to enable us to fulfill our obligations arising from your employment contract. Furthermore, within Schaeffler we receive your data from the sources that include the following:

- Insurance company (by contract in the event of damage)
- HR Schaeffler (e.g. SAP/HP1)

### **5. Who can access my data?**

Within the Schaeffler Group, your data is accessible to those parties who require access to them according to the so-called "Least Privilege" principle (assignment of rights of use in the smallest possible

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<sup>1</sup> Racial and ethnic origin, political opinions, religious or ideological convictions, trade union memberships, genetic data, biometric data, health-related data, and data related to sex life or sexual orientation

scope) and the need-to-know principle (knowledge of data only when required). Service providers and vicarious agents employed by us may receive data from us for these purposes if this is necessary, it is required by law, you have given your consent, or processors commissioned by us requires that the specifications of the GDPR and the German Federal Data Protection Act (BDSG) will be observed. Under these conditions, recipients of personal data can include the following:

- HR department Schaeffler
- Insurance company
- Law firms

## **6. Is data transferred to third countries or international organizations?**

The transfer of data to countries outside of the EU/EEA (so-called “third countries”) only takes place when necessary or legally prescribed, when you have given to us your consent, or as part of the processing of an order. If service providers in third countries are employed, they are obliged to confirm that they will observe the European level of data security by agreeing in writing to the EU’s standard contractual clauses.

## **7. How long will my data be stored?**

We will process and store your personal data for as long as this is necessary for the respective purpose. If your data is no longer required, it will be deleted regularly, unless legal obligations to preserve records prevent this deletion.

Basically, we store your data for the duration of the employment or contract relationship and 3 years after the termination. In exceptional cases, a longer duration of storage in accordance with the legal requirements (e.g. in the course of the company pension) can take place.

## **8. Am I under obligation to provide data?**

As part of the conclusion of contracts, you are obliged to provide such personal data which is necessary to justify, to implement, and to terminate the contract and fulfill the obligations arising from it, or such personal data to which Schaeffler is legally bound to record. Without this data, no contracts can be concluded with Schaeffler.

## **9. What data protection rights do I have?**

You have the right to the following:

- Information regarding your personal data that has been processed in accordance with article 15 of the GDPR
- Correction of incorrect personal data according to article 16 of the GDPR
- Deletion of your personal data according to article 17 of the GDPR
- Restriction of data processing according to article 18 of the GDPR
- Objection according to article 21 of the GDPR
- Data portability according to article 20 of the GDPR

The restrictions specified in §§ 34 and 35 of the German Federal Data Protection Act / BDSG apply to the right of information and the right of deletion. Additionally, you have the right to complain to the supervisory authority for data protection according to article 77 of the GDPR in conjunction with § 19 of the German Federal Data Protection Act / BDSG.

## **10. To what extent are decisions made automatically?**

Automated decisions are decisions that are made exclusively by a machine, without evaluation by a natural person. We generally do not use any automated decision-making systems in accordance with article 22 of the GDPR. Should we use such systems in individual cases, we will inform you of this separately, provided that this is legally required and if necessary obtain your prior consent.

**11. Does “profiling” take place?**

“Profiling” refers to any kind of automated processing of personal data for the purpose of analyzing or predicting the working performance, economic status, health, personal preferences, interests, reliability, conduct, location, or relocation of a natural person. Schaeffler generally does not use “profiling”. Should we use such systems in individual cases, we will inform you of this separately, provided that this is legally required and if necessary obtain your prior consent.