

# DATA PRIVACY POLICY

## **Data Privacy Policy for Web sites and information for data subjects in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR)**

The company iwis and its associated subsidiaries (referred to jointly below as “the company”, “we”, “us”, “iwis” or “the iwis Group”) take the protection of your personal data extremely seriously. In this document, we wish to provide you with information about how we protect your personal data in our company.

Pursuant to Articles 13 and 14 of the General Data Protection Regulation (GDPR) we are obliged, insofar as we decide either alone or with others on the purposes and means of data processing, to inform you transparently about the nature, scope, purpose, and lawfulness of the processing and duration of the storage of the data.

The structure of this Data Privacy Policy is given in the table of contents below.

## Contents

<b>1.</b>	<b>General</b>	<b>4</b>
1.1	Controller and contract data	4
1.2	Data protection officer	4
1.3	Lawfulness for the processing of personal data	5
1.4	Retention period and data deletion	6
1.5	Data security	6
1.6	Collaboration with service providers	6
1.7	Transfer of personal data to third countries	6
1.8	No automated decision-making	7
1.9	Your rights	7
1.9.1	Your right to information	7
1.9.2	Right to rectification	7
1.9.3	Right of erasure	7
1.9.4	Right to restriction of processing	7
1.9.5	Right to data portability	8
1.9.6	Right to object	8
1.9.7	Revocation of consent	8
1.9.8	Right to lodge a complaint	8
1.10	Changes to the data privacy statement	8
<b>2.</b>	<b>Web sites and social media pages</b>	<b>9</b>
2.1	Categories of personal data affected, purposes and lawfulness of processing, retention period	9
2.2	Recipients and persons authorized to access the data	10
<b>3.</b>	<b>Use of cookies on the Web site</b>	<b>12</b>
<b>4.</b>	<b>Customers</b>	<b>13</b>
4.1	Categories of personal data affected / sources of data	13
4.2	Purposes and lawfulness of data processing	14
4.3	Retention period	14
4.4	Recipients and persons authorized to access the data	15
<b>5.</b>	<b>Business partners</b>	<b>16</b>
<b>6.</b>	<b>Employees</b>	<b>17</b>
6.1	Categories of personal data affected / sources of data	17

6.2	Purposes and lawfulness of data processing .....	18
6.3	Retention period .....	19
6.4	Recipients and persons authorized to access the data .....	20
7.	<b>Applicant</b> .....	<b>22</b>
7.1	Categories of personal data affected / sources of data .....	22
7.1.1	Direct application .....	22
7.1.2	Application via third parties (recruitment agencies, temporary employment agencies) .....	22
7.1.3	Application through a recruitment order with the Federal Employment Agency .....	22
7.2	Purposes and lawfulness of data processing .....	24
7.3	Retention period .....	24
7.4	Recipients and persons authorized to access the data .....	25
8.	<b>Data subject</b> .....	<b>26</b>
8.1	Purposes, categories, lawfulness, and retention periods .....	26
8.2	Recipients and persons authorized to access the data .....	27
9.	<b>Video surveillance at the locations</b> .....	<b>29</b>
9.1	Purposes and lawfulness of data processing .....	29
9.2	Retention period .....	30
9.3	Recipients and persons authorized to access the data .....	30

# 1. General

## 1.1 Controller and contract data

Companies	<p>This Data Privacy Policy is applicable to the following companies of the iwis Group:</p> <ul style="list-style-type: none"> <li>▪ iwis AG</li> <li>▪ iwis antriebssysteme GmbH</li> <li>▪ IWIS Antriebssysteme GmbH &amp; Co.KG</li> <li>▪ iwis antriebssysteme spol. s.r.o.</li> <li>▪ IWIS DRIVE SYSTEMS LIMITED</li> <li>▪ IWIS DRIVE SYSTEMS S.R.L.</li> <li>▪ iwis e-tec GmbH</li> <li>▪ iwis mechatronics GmbH &amp; Co. KG</li> <li>▪ IWIS MECHATRONICS S.R.L.</li> <li>▪ IWIS MOBILITY SYSTEMS S.R.L.</li> <li>▪ iwis mobility systems GmbH &amp; Co. KG</li> <li>▪ iwis mobility systems GmbH &amp; co. KG</li> <li>▪ iwis SE &amp; Co. KG</li> <li>▪ iwis mechatronics GmbH</li> <li>▪ iwis mechatronics international GmbH</li> </ul> <p>Further contact details regarding the named companies can be found here: <a href="https://www.iwis.com/de-de/iwis-weltweit">https://www.iwis.com/de-de/iwis-weltweit</a></p>
Legal representative:	<p>The controller for the processing of your personal data is</p> <p>iwis SE &amp; Co. KG</p> <p>Albert-Roßhaupter-Str. 53</p> <p>81369 Munich, Germany</p> <p>Chairman of the Board Johannes Winklhofer and the Managing Directors of each of the associated companies.</p>

## 1.2 Data protection officer

If you have any questions regarding data privacy, please contact our data protection officer, using the contact details below:

Postal address: ben digital services GmbH

Ben Hansen

Schlossstrasse 19

82031 Gruenwald, Germany

e-mail: [datenschutz@iwis.com](mailto:datenschutz@iwis.com)

### 1.3 Lawfulness for the processing of personal data

According to the provisions of data protection law, the processing of personal data is only permissible if it rests on a lawfulness. The following lawfulness is relevant with regard to the data processing operations that we perform:

- Article 6, paragraph 1, subparagraph 1, point a GDPR (“consent”):

The data subject may voluntarily, in an informed manner and unambiguously indicate by a declaration or other affirmative act that he or she consents to the processing of personal data relating to him or her for one or more specific purposes.

- Article 6, paragraph 1, subparagraph 1, point b GDPR:

Processing of personal data can be necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

- Article 6, paragraph 1, subparagraph 1, point c GDPR:

Processing of personal data can be necessary for compliance with a legal obligation to which we or another controller are subject (e.g. statutory retention period).

- Article 6, paragraph 1, subparagraph 1, point e GDPR:

Processing of personal data can be necessary for the performance of a task carried out in the public interest.

- Article 6, paragraph 1, subparagraph 1, point f GDPR (“legitimate interests”):

Processing of personal data can be necessary for the purposes of the legitimate interests, in particular legal or commercial interests, pursued by us or by a third party. However, processing is only permitted where such interests are not overridden by the interests or rights of the data subject.

In the following, we indicate in each case the applicable lawfulness for the data processing that we perform. Processing may also rest on multiple legal bases.

## 1.4 Retention period and data deletion

We indicate below how long we will store the data and when it will be deleted or locked. Unless we have specified an explicit retention period below, the personal data processed will be deleted or locked as soon as the purpose or lawfulness for the storage of the data no longer applies.

In the event of an (impending) legal dispute with you or of other legal proceedings or if storage is provided for by statutory regulations, in particular by retention obligations to which we are subject (e.g., § 257 or § 147 of the German Commercial Code), we will store the personal data beyond the specified period. When the statutory retention period has expired, we will delete the personal data unless it is necessary for us to continue to store the data and there is a lawfulness for further data processing.

## 1.5 Data security

We employ appropriate technical and organizational security measures to protect the data we process against accidental or intentional manipulation, partial or complete loss, destruction and against unauthorized access by third parties. When selecting and applying the security measures, we take into account the current state of the art, the existing risks of a data security breach as well as the probability of such a breach and its effects for the data subjects. We are constantly improving our security measures in line with technological developments. We will be happy to provide you with more detailed information on our security measures. Please contact our data protection officer (for contact details, see section 1.2).

## 1.6 Collaboration with service providers

In pursuing our business activities, we collaborate with a large number of domestic and foreign external service providers (e.g. for IT, telecommunications, customer service, maintenance). These service providers only act on our instructions and have been contractually obliged to comply with data protection regulations in accordance with Article 28 GDPR.

Insofar as personal data is transmitted by us to our subsidiaries or by our subsidiaries to us, this is also done on the basis of existing subcontracted processing relationships, for which agreements have also been concluded in accordance with Article 28 GDPR.

## 1.7 Transfer of personal data to third countries

In the course of our business relationships, your personal data may be transferred to service providers located outside the European Economic Area, i.e. in third countries. Such a transfer of data is only carried out in order to fulfil contractual and business obligations. We will inform you about the details of such transfer at the relevant points below.

## 1.8 No automated decision-making

Your personal data will not be used for any automated decision-making process (including profiling).

## 1.9 Your rights

The provisions of data protection law (GDPR, German Federal Data Protection Act (BDSG)) grant you, as a data subject, the rights described below. You can exercise these rights by addressing a notification (in person, by email or by post) to the contact addresses of the company given in Section 1.1 or the contact addresses of the data protection officer given in section 1.2. These rights, with the exception of the right to withdraw consent, are not absolute, but may depend on the circumstances of the individual case.

### 1.9.1 Your right to information

You have the right to request information as to whether personal data about you is being processed. If this is the case, you may request information about the personal data, such as the purposes of the processing, the categories of personal data concerned and the recipients or categories of recipients to whom the personal data is disclosed. You have a right to receive a copy of the personal data that is undergoing processing.

### 1.9.2 Right to rectification

You have the right to request us to correct inaccurate personal data about you. Depending on the purpose of the processing, you have the right to request the completion of incomplete personal data by means of a supplementary declaration.

### 1.9.3 Right of erasure

In certain circumstances, you have the right to request that we erase your personal data and we may be obliged to erase your personal data in individual cases.

### 1.9.4 Right to restriction of processing

Under certain circumstances, you have the right to request us to restrict the processing of your personal data. In this event, we will flag the relevant data accordingly and only process it for specific purposes.

### **1.9.5 Right to data portability**

In certain circumstances, you have the right to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format. If this right applies, you also have the right to transfer this personal data to another controller without hindrance by us.

### **1.9.6 Right to object**

You have the right to object to the processing of your personal data by us at any time for reasons arising from your particular situation, insofar as the processing of your personal data is based on Article 6 (1) point e or f of the GDPR. We may be obliged to stop processing your personal data.

### **1.9.7 Revocation of consent**

Insofar as you have given us your consent for certain processing activities, you may revoke this consent at any time with future effect. However, such revocation does not affect the lawfulness of the data processing that took place up to the time of the revocation. If you wish to revoke the consent you have granted us, notify us using the channels above.

### **1.9.8 Right to lodge a complaint**

Furthermore, you have the right to contact the competent data protection authority, the Bavarian State Office for Data Protection Supervision (BayLDA), in the event of complaints regarding the processing of your personal data.

## **1.10 Changes to the data privacy statement**

We regularly review the data privacy statement and adapt it as necessary in order to keep it up to date, taking into account developments in data protection legislation and technological or organizational changes. Details regarding the version can be found in the footer.



## 2. Web sites and social media pages

At [www.iwis.com](http://www.iwis.com) and other web sites of iwis, including the associated subpages (hereinafter collectively referred to as “the Web site”), you will find information about our company and the services we offer. In this section of the Data Privacy Policy, we explain how your personal data is processed in connection with the use of our Web site.

### 2.1 Categories of personal data affected, purposes and lawfulness of processing, retention period

In connection with the use of the Web site, we only process personal data from users that is directly generated in the course of use of the site. The purposes and lawfulness of data processing are determined by the relevant functionality of the Web site. The processing of your personal data in connection with the use of the Web site is described in more detail in the following sections:

Purposes of processing	Categories of personal information	Lawfulness for processing	Duration of storage
Logging of Web site accesses in log files to allow analysis of user messages as well as analysis of attacks and their prevention	<ul style="list-style-type: none"> <li>▪ Time of access</li> <li>▪ IP address of the user</li> </ul>	Protection of overriding legitimate interests (Article 6, para. 1, point f GDPR).	30 days
Communication with you regarding iwis services, by means of email, telephone, or newsletter	<ul style="list-style-type: none"> <li>▪ Name details</li> <li>▪ Email address</li> <li>▪ Company information</li> </ul> <p>You actively provide us with this data when registering for the newsletter.</p>	The email newsletter will only be sent with your consent (Article 6, para. 1, point a GDPR).	Your data will remain stored for as long as you are subscribed to the newsletter. Your data will be deleted as soon as you unsubscribe from the newsletter.
Communication with you in webinars as part of product training courses	<ul style="list-style-type: none"> <li>▪ Name details</li> <li>▪ Email address</li> <li>▪ Company information</li> </ul> <p>You actively provide us with this data when registering for the newsletter.</p>	Registration for the webinar only takes place with your consent (Article 6, para. 1, point a GDPR).	Your data will be stored until the event is held.

Your personal data will only be processed for other purposes insofar as we are obliged to do so based on legal requirements (e.g., transmission of personal data to courts or law enforcement authorities), if you have consented to the processing or insofar as the processing is permitted for other reasons under applicable law.

You may choose not to provide us with certain categories of personal data.

If you choose not to provide us with certain categories of personal data, this may result in us not being able to offer you certain features and content on this Web site, or to being able to do so only to a limited extent, and your use of the Web site and its features may be restricted.

## **2.2 Recipients and persons authorized to access the data**

We only pass on your personal data within our company to the departments and persons who need this data in order to analyse user messages, attacks and their prevention and to send the newsletter (e.g., IT employees, communications department).

Otherwise, data will only be passed on to recipients outside the company insofar as this is permitted or required by law, if it is necessary to pass on the data in order to analyse user messages, attacks and their prevention and to send the newsletter, if we have your consent as necessary, if we are authorized to provide information or if the transfer of data is made to protect the legitimate interests of the company. We do not transfer your personal data to service providers outside the European Union.

Furthermore, we work together with internal and external service providers in order to be able to offer you the Web site and the functions it provides. In order for these service providers to be able to provide their services to iwis, they may have access to your personal data to the extent necessary in each case. Collaboration with the service providers takes place based on subcontracted processing agreements in accordance with Article 28 of the GDPR. In this way, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR, in particular that the data is only processed within the scope of our instructions for the corresponding processing purposes and that appropriate measures are taken to protect your personal data.

This means that the categories of recipients can be as follows:

Recipient	Purpose of data processing	What safeguards are in place for international data transfer if the recipient is located outside the European Economic Area?
Service providers for operation of the online portal and the processing of data stored or transmitted by the systems (e.g. for data centre services, payment processing, IT security).	Processing is carried out to guarantee operation of the online portal and to ensure the IT security of iwis, in particular to protect against attacks from the network.	Data is not transmitted to recipients outside the European Economic Area.
Service providers for the support of customers and partners in connection with the use of the online shop.	Processing is carried out to guarantee that the online shop can be used, to receive error messages and to answer questions in connection with the use of the online shop.	Data is not transmitted to recipients outside the European Economic Area.

We may also transmit your personal data to government authorities, courts, external consultants and other third parties as required or permitted by law in order to:

- ensure compliance with applicable law,
- respond to requests from public authorities,
- comply with applicable legal process,
- protect and enforce the rights, safety, privacy or property of iwis, visitors to the Web site, iwis' customers, our employees, or the public,
- enable us to pursue any existing legal remedies or mitigate any damage we may suffer,
- enforce the terms of use for the online services we provide, and
- respond to emergencies.

Such transmission is permissible as per Article 6, paragraph 1, point c and/or Article 6, paragraph 1, point f GDPR.

### 3. Use of cookies on the Web site

We use cookies on our Web site. Cookies are data records that are sent from the Web server to the user's browser and stored there. We use both session cookies and persistent cookies. A session cookie ceases to exist after you close your browser. A persistent cookie remains in existence after you close your browser and can be used by your browser on subsequent visits to our Web site. Your Web browser may offer you a number of options regarding cookies. Please note that if you delete or do not accept cookies, you may not be able to use the full feature set of the Web site. Some of the cookies we use are necessary to allow the Web site to be presented in a user-friendly manner. We use other cookies for the purpose of analysis to collect information about the behaviour of the users of the Web site and their end devices. This information helps us to design the Web site to meet the needs of the users.

Unless the use of cookies is technically necessary, cookies will only be used with your express consent. To this end, when you first access the Web site, you will be asked whether you agree to the use of the relevant cookies.

A precise overview of the cookies used is generated dynamically each time you visit the Web site and presented to you in tabular form.

You can access the current list here:

<https://www.iwis.com/en-gb/data-protection#CookieDeclarationChangeConsentChange>

The list shows the name, the purpose and the retention period. The cookies are also divided into categories. The category "Necessary" cannot be deselected and is technically necessary for the operation of this Web site.

All other categories can be deselected and are thus disabled, which means that no data is collected.

## 4. Customers

If you are one of our customers, then we process your data.

In this section, we explain how we process your personal data in connection with our contractual relationship.

### 4.1 Categories of personal data affected / sources of data

We only process data that is relevant to the initiation and conclusion of a contract, as well as for the billing, delivery and execution of such a contract. This is data relating to your person, your company and the goods and services you require.

We process personal data provided by you for the purpose of initiating and concluding a contract or created by us in the course of fulfilling the contract.

What data is processed?

Type of personal data	How do we obtain the data?	Are these special categories of personal data? (Y/N)
Details about you and your company and contact data – name of company, name of contact person, address, telephone number and email address, Web address.	You provide this data for the purpose of initiating or concluding an order or contract, or we obtain this data from service providers or partners.	No
Special information about your company and your person – your account details, tax number, affiliation to a general contractor, name and contact details of a holder of power of attorney	You provide this data when concluding a contract	No
Your customer data – customer number, invoice numbers, order number, etc.	This data is assigned to you when you conclude the contract and when each invoice / demand is issued.	No
Information on the subject of the contract - type, quantities, scopes, place and time of goods, persons and services.	You provide this data when initiating or concluding a contract.	No

## 4.2 Purposes and lawfulness of data processing

We process the personal data listed above insofar as it is necessary for the initiation, conclusion, and fulfilment of the contract. The lawfulness for this is:

- GDPR Article 6, paragraph 1, point a based on consent from you, although no consent is in principle required for the conclusion of a contract or the continuation of an existing contract,
- GDPR Article 6, paragraph 1, point b for the establishment, fulfilment, and termination of a contractual relationship,
- GDPR Article 6, paragraph 1, point c for the fulfilment of a legal obligation,
- GDPR Article 6, paragraph 1, point f to protect a legitimate interest.

We only process your personal data within the scope permitted by law.

The following table lists the purposes and lawfulness for the processing of your personal data:

Purpose of data processing	Lawfulness of processing	Duration of storage
Management of the business relationship: Conclusion of the contract, establishing contact, answering enquiries, managing the customer account, general customer information, handling complaints.	<p>The lawfulness for processing may be:</p> <ul style="list-style-type: none"> <li>▪ the fulfilment of a contract (Article 6, paragraph 1, point b GDPR),</li> <li>▪ the protection of the legitimate interest of the company (business operations and licensee management, Article 6, paragraph 1, point f GDPR)</li> </ul>	Up to 10 years after the end of the contract

## 4.3 Retention period

We store your personal data in accordance with applicable data protection laws only for as long as is necessary to fulfil our obligations, in particular those arising from the contract, and only for as long as is necessary to achieve the purposes for which your personal data was collected.

Commercial and tax law may oblige us to store your personal data for longer than is necessary for the stated purposes. The table presented in Section 4.2 shows the regular storage duration for each of the purposes for which we process your personal data. If we determine that there is no longer a need or requirement for us to retain your personal data, we will no longer process that data and will delete it from our systems and/or take steps to properly anonymize it in accordance with applicable laws or internal policies, unless we need to retain your data to comply with statutory or regulatory requirements to which we are subject.

## 4.4 Recipients and persons authorized to access the data

We only pass on your personal data within our company to the departments and persons who need this data for the initiation, conclusion and fulfilment of the contract or the assertion or defence of claims (e.g. staff of the dispatch department, legal department, finance and accounting department, etc.).

Otherwise, data will only be passed on to recipients outside the company insofar as this is permitted or required by law, if it is necessary to pass on the data in order to initiate, conclude and fulfil the contract, if we have your consent as necessary, if we are authorized to provide information or if the transfer of data is made to protect the legitimate interests of the company. Your personal data will not be transmitted to service providers outside the European Union unless fulfilment of the contract makes this necessary.

Furthermore, your personal data is also processed on our behalf on the basis of subcontracted processing agreements in accordance with Article 28 of the GDPR. In such cases, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR.

Recipient	Purpose of data processing	What safeguards are in place for international data transfer if the recipient is located outside the European Economic Area?
Service providers such as financial service providers, IT service providers, postal service providers, call centres, consultants, data analysts, auditors, legal advisers, security officers, temporary employment agencies.	Processing is carried out to comply with legal regulations and/or if the legitimate interest of the company (business operations, financial management, business field development) pertains.	Data is not transmitted to recipients outside the European Economic Area

## 5. Business partners

In the context of business relationships, we process the personal data of our business partners as follows:

<b>Affected data:</b>	Data provided for the purposes of contract execution; any data going beyond that required for this purpose will be processed only following your express consent.
<b>Purpose of processing:</b>	Execution of contract, including requests, purchasing, quality assurance
<b>Categories of recipients:</b>	<p>Public authorities in the presence of overriding legal requirements, including tax authorities</p> <p>External service providers or other contractors, including for data processing and hosting, accounting services, payment services.</p> <p>Other external bodies provided that the data subject has given consent for this or transfer is permitted due to an overriding interest.</p>
<b>Transfer to third countries:</b>	During the execution of a contract, processors from outside of the European Union may also be called on.
<b>Period of storage of the data:</b>	The period for which the data is stored depends on the statutory retention periods and is usually equal to 10 years



## 6. Employees

If you are an employee, we process some of your personal data over the course of your employment. There is a dedicated section covering the initiation of an employment relationship, see Section 7.

### 6.1 Categories of personal data affected / sources of data

We only process data that is related to your employment. This may be general personal data (name, address, contact details, etc.), details of your professional qualifications and school education, details of further professional training and, where applicable, other data required to fulfil legal obligations in respect of the contract, accounting and taxation (bank details, health insurance, social security, tax data, etc.).

The following personal data is processed:

Type of personal data	How do we obtain the data?	Are these special categories of personal data (Y/N)?
Your private contact details, e.g. address, place of residence, telephone number.	You provide us with this data when you start employment.	No
Your work contact data, e.g. telephone number, place of work, email address.	This data is assigned to you when you take up employment.	No
Identification/payment data; identity card data or work permit for identifying and determining the legitimacy of employment, place of birth, marital status, tax identification number, health insurance provider, income tax class, tax-free allowances	You provide us with this data when you start employment.	Yes
Timesheet data, holiday dates, working time accounts, shift schedules if applicable.	This data is created jointly in a dialogue.	No
Data suitable for monitoring performance/behaviour; training and further training information, data for the purpose of measuring achievement of targets, e.g.	This data is created jointly in a dialogue.	No

for variable remuneration component.		
Other HR data, e.g. company anniversary, occupational health and safety, possession of driving licence.	This data is created jointly in a dialogue.	No
Photo or video recordings	This data is created jointly in a dialogue.	No

## 6.2 Purposes and lawfulness of data processing

We process your personal data insofar as this is necessary for agreeing and maintaining the employment relationship. The lawfulness for this is:

- GDPR Article 6, paragraph 1, point a on the basis of consent from you, although no consent is in principle required for the conclusion of a contract or the continuation of an existing contract,
- GDPR Article 6, paragraph 1, point b for the establishment, fulfilment and termination of a contractual relationship,
- GDPR Article 6, paragraph 1, point c for the fulfilment of a legal obligation,
- GDPR Article 6, paragraph 1, point f to protect a legitimate interest.

We only process your personal data within the scope permitted by law.

The following table lists the purposes and lawfulness for the processing of your personal data:

Purpose of data processing	Lawfulness of processing	Duration of storage
Management of the employment relationship (incl. additional benefits such as non-cash benefits), professional support and deployment of employees to an appropriate job, duty of care, complying with the requirements of company agreements, employee surveys to improve employment relations, Execution of orders within the business purpose of the organisation	<p>The lawfulness for processing may be:</p> <ul style="list-style-type: none"> <li>▪ the fulfilment of a contract (Article 6, paragraph 1, point b GDPR),</li> <li>▪ the protection of the legitimate interest of the company (business operations and licensee management, Article 6, paragraph 1, point f GDPR)</li> </ul>	Up to 10 years after the end of the contract concerned

Internal communication, team building, marketing	<p>The lawfulness for processing may be:</p> <ul style="list-style-type: none"> <li>▪ the protection of the legitimate interest of the company (Article 6, paragraph 1, point f GDPR)</li> </ul>	Up to 3 years
Fulfilment of the tasks of the works council (or election committee)	<p>The lawfulness for processing may be:</p> <ul style="list-style-type: none"> <li>▪ to fulfil a legal obligation of the company (Article 6, paragraph 1, point c GDPR)</li> <li>▪ Receipts and proofs of entitled cost claims: § 40 BetrVG, § 146 AO</li> <li>▪ Works council election: § 126 BetrVG in conjunction with §§ 2 para. 1, 6 para. 3 WO</li> <li>▪ Minutes of meetings of works council, § 34 para. 1 sentence 1 BetrVG</li> </ul>	<p>Receipts up to 10 years after the end of the calendar year in which the accounting receipt was created (§ 147 para. 1 point 4, para. 4 AO, § 257 para. 4 HGB)</p> <p>Proofs of entitled cost claims: three years from the end of the year in which the claim arose (§ 195 BGB)</p> <p>Election files: at least until the end of the relevant term of office (§ 19 WO); longer if necessary (e.g. in the event of an election appeal)</p> <p>Minutes of meetings: for as long as their content is of legal significance, if necessary, also beyond the respective term of office</p>

### 6.3 Retention period

We process your personal data as long as this is necessary for the establishment, conduct or management of the employment relationship or for the exercise or fulfilment of the rights and obligations resulting from the employment contract or for the exercise or fulfilment of the rights and obligations associated with representing the interests of the employee resulting from a law or a collective agreement, a company or service agreement (collective agreement).

In addition, we are subject to various retention and documentation obligations, which result, among other things, from the German Commercial Code (HGB) and the German Fiscal Code (AO). The table presented in Section 6.2 shows the regular storage duration for each of the purposes for which we process your personal data. If we determine that there is no longer a need or requirement for us to retain your personal data, we will no longer process that data and will delete

it from our systems and/or take steps to properly anonymize it in accordance with applicable laws or internal policies.

Ultimately, the retention period also depends on the statutory limitation periods, which, for example, according to the German Civil Code (BGB), are usually three years, but in certain cases can be up to thirty years.

## 6.4 Recipients and persons authorized to access the data

Otherwise, data will only be passed on to recipients outside the company insofar as this is permitted or required by law, if it is necessary to pass on the data in order to initiate, conclude and fulfil the contract, if we have your consent as necessary, if we are authorized to provide information or if the transfer of data is made to protect the legitimate interests of the company. Your personal data will not be transmitted to service providers outside the European Union unless fulfilment of the contract makes this necessary.

Furthermore, your personal data is also processed on our behalf on the basis of subcontracted processing agreements in accordance with Article 28 of the GDPR. In such cases, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR.

We only pass on your personal data within our company to those departments and persons who need this data to fulfil contractual and legal obligations or to pursue our legitimate interests (e.g., internal accounting).

We may transmit your personal data to companies that are affiliated to us insofar as this is permissible in the context of the purposes and lawfulness set out in the following table.

Your personal data is processed on our behalf on the basis of subcontracted processing agreements in accordance with Article 28 of the GDPR. In such cases, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR. The categories of recipients in this case are providers of internet services and providers of employee management systems / employee task systems and software (e.g., travel expense accounting, electronic personnel files).

Beyond this, data is only passed on to recipients outside the company if this is permitted or required by law, if the transmission of data is necessary for processing and thus fulfilling the employment contract, if we have your consent or if we are authorised to provide information. Under these conditions, recipients of personal data can be, for example:

Recipient	Purpose of data processing	What safeguards are in place for international data transfer if the recipient is located outside the European Economic Area?
Service providers such as financial service providers, IT service providers, postal	Processing is carried out to comply with legal regulations and/or if the legitimate interest	Mainly transfer of data to recipients within the European Economic Area.

<p>service providers, call centres, consultants, data analysts, auditors, legal advisers, security officers, temporary employment agencies, Trade portals (e.g. for bidding), Press agency and media, Works Council (election committee)</p>	<p>of the company (business operations, financial management, business field development) pertains.</p>	<p>Transfers to third countries only if the standard contractual clauses (version of 2021) have been agreed with the service provider.</p>
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## 7. Applicant

If you apply for a job with us, we will process certain data about you as part of the application process. In this section, we explain how we process your personal data in connection with your application.

### 7.1 Categories of personal data affected / sources of data

#### 7.1.1 Direct application

If you apply directly to us, we will only process the data that you provide to us as part of your application. This includes, in particular, information about you, such as your name, contact details (address, email address and telephone number), marital status, information about your school education and professional qualifications, information about further professional training and, where applicable, information about your previous employers and positions.

We also understand this to include applications received through a job fair or university fair or similar event of the nature of a trade fair in which we take part.

#### 7.1.2 Application via third parties (recruitment agencies, temporary employment agencies)

If you apply to us through a recruitment agency or a temporary employment agency proposes you for a job with us, we will only process the data that you have provided to that recruitment agency or temporary employment agency. This includes, in particular, information about you, such as your name, contact details (address, email address and telephone number), marital status, information about your school education and professional qualifications, information about further professional training and, where applicable, information about your previous employers and positions.

#### 7.1.3 Application through a recruitment order with the Federal Employment Agency

We can place a recruitment order with the Federal Employment Agency in the case of vacancies. As part of the recruitment order process, we are granted access to data on applicants in the database of the Federal Employment Agency. If you have registered for placement in this database, we will have access to the personal data you have entered in the database. This data may in particular include: Your name, contact details (address, email address and telephone number), marital status, information about your school education and professional qualifications, information about further professional training and, where applicable, information about your previous employers and positions.

How is the data processed?

Type of personal data	Where is the personal data obtained from?	Are these special categories of personal data? (Y/N)
Your personal details and contact data – name, address, telephone number and email address.	<p>You provide these details as part of your application for the job. In the case of an application through a recruitment agency or a proposal from a temporary employment agency, this data will be provided to us by the recruitment agency or temporary employment agency.</p> <p>In the case of a recruitment order with the Federal Employment Agency, we will have access to this data if you have stored it in the database of the Federal Employment Agency.</p>	No
Travel data, bank details	You provide this data as part of the application process if you apply for reimbursement of expenses incurred in travelling to the job interview.	No
Information on date and place of birth, nationality, religious affiliation, gender, marital status, and disability, to the extent permitted by law.	<p>You may provide these details as part of your application for the job. In the case of an application through a recruitment agency or a proposal from a temporary employment agency, this data will be provided to us by the recruitment agency or temporary employment agency.</p> <p>In the case of a recruitment order with the Federal Employment Agency, we will have access to this data if you have stored it in the database of the Federal Employment Agency.</p>	Yes
Information on your academic and professional qualifications – information on education and degrees, further training, professional qualifications, information on job-related knowledge, information in letters of application and CVs, as well as references and testimonials.	<p>You provide these details as part of your application for the job. In the case of an application through a recruitment agency or a proposal from a temporary employment agency, this data will be provided to us by the recruitment agency or temporary employment agency.</p> <p>In the case of a recruitment order with the Federal Employment Agency, we will have access to this data if you have</p>	No

	stored it in the database of the Federal Employment Agency.	
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## 7.2 Purposes and lawfulness of data processing

We process the personal data listed only for the purpose of conducting the application process. We use the data to contact you in order to arrange a personal interview with you, to assess your suitability for the job and to inform you of our decision and the conclusion of the application process. If you apply for reimbursement of your travel expenses, we also need data from you in order to settle your claim.

In the event of legal disputes in connection with the application process, the data will also serve as evidence for us to assert or defend claims. The possibility of defending or asserting claims constitutes a legitimate interest for us.

If your application is successful, we will use your data to contact you in order to establish the employment relationship.

The lawfulness for the processing of your personal data is given by Article 88 GDPR in conjunction with Section 26 (1) of the German Federal Data Protection Act (BDSG) and Article 6 (1) points b and f of the GDPR. With regard to the special categories of personal data processed (see 3.), the processing of the data is based on Article 88 GDPR in conjunction with Section 26 (3) of the German Federal Data Protection Act (BDSG).

## 7.3 Retention period

We store your personal data in accordance with the applicable data protection legislation only for as long as is necessary to conduct the application process. Since there is a possibility of litigation after the conclusion of an application process, we retain the data even after the application process has ended for the purpose of preserving evidence. Your personal data will then generally be deleted 6 months after the conclusion of the application process.

If your application is successful, we will continue to process the data required to conclude the employment contract. In this regard, the retention obligations that we have put in place for the personal data of employees will then apply. You will be informed of these periods when the employment contract is concluded. Data that is not required for the conclusion of the employment contract will also be deleted 6 months after the conclusion of the application procedure in accordance with the reasons listed above.



## 7.4 Recipients and persons authorized to access the data

We only pass on your personal data within our group of companies to the departments and persons who need this data to conduct the application process (HR department, relevant specialist department).

Otherwise, data will only be passed on to recipients outside the group of companies insofar as this is permitted or required by law, if it is necessary to pass on the data in order to conduct the application process, if we have your consent as necessary, if we are authorized to provide information or if the transfer of data is made to protect the legitimate interests of the company. Your personal data will not be transmitted to service providers outside the European Union unless the application process requires you to travel to one of our subsidiaries outside of the European Union.

Furthermore, your personal data is also processed on our behalf on the basis of subcontracted processing agreements in accordance with Article 28 of the GDPR. In such cases, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR.

## 8. Data subject

At [www.iwis.com/dataprotection](http://www.iwis.com/dataprotection), we offer the option of submitting data subject requests in accordance with Art. 15 - 22 GDPR directly to our data protection management system via a web form. In this section of the privacy policy, we explain how your personal data is processed in association with the use of this web form.

### 8.1 Purposes, categories, lawfulness, and retention periods

In relation to the use of this web form, we only process personal data from the users that directly arise in the context of the use. The purposes and lawfulness of data processing are determined by the relevant functionality of the underlying website. The processing of your personal data in connection with the use of the web form for data subject enquiries is described in more detail below:

Processing purposes	Categories of personal data	Lawfulness	Retention period
Logging of website accesses within the scope of log files for the analysis of user messages as well as attack and defence analysis	<ul style="list-style-type: none"> <li>▪ Time of the access</li> <li>▪ IP address of the user</li> </ul>	processing is necessary for the purposes of the legitimate interests (Art. 6 Para. 1 lit. f) GDPR).	30 days
Inclusion of your data in the data protection management system via a web form for the purpose of processing your enquiry as a data subject within the meaning of the GDPR.	<ul style="list-style-type: none"> <li>▪ Name details</li> <li>▪ E-mail address</li> <li>▪ Enquiry details</li> <li>▪ Content of the enquiry</li> </ul> <p>You actively provide us with these data when filling out the request.</p>	processing is necessary for compliance with a legal obligation Art. 12 Para. 2 Sentence 1 GDPR (Art. 6 Para. 1 lit. c) GDPR).	Your data will be stored for as long as is necessary to process your enquiry within the specified time limits. After the request has been completed, your request data will be stored for another 3 years to avoid legal claims under the OWiG, after which they will be deleted.

Your personal data will only be processed for other purposes if we are obliged to do so on the basis of legal requirements (e.g., transfer of personal data to courts or law enforcement authorities).

You may choose not to provide us with certain categories of personal data.

If you choose not to provide us with certain personal data, this may result in us not being able to process your request properly.

## 8.2 Recipients and persons authorized to access the data

We only share your personal data within our company with the departments and persons who need this data for the analysis of user messages, attack and defence analysis and for processing data protection enquiries (e.g., employees of the IT, communications department, specialist departments with processing of your data).

Otherwise, data will only be transferred to recipients outside the company if this is permitted or required by law, the transfer is necessary for the analysis of user reports, attack and defence analysis and - if necessary - your consent has been given, we are authorised to provide information, or the transfer is made to protect the legitimate interests of the company. Your personal data is not transferred to service providers outside the European Union.

In addition, we work together with internal and external service providers in order to be able to offer you the web form and the features offered through it. In order for these service providers to be able to provide their services to iwis, they may have access to your personal data to the extent necessary in each case. The cooperation with the service providers takes place on the basis of order processing contracts in accordance with Art. 28 GDPR. In this way, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR, in particular that the data is only processed within the scope of our instructions for the respective processing purposes and that appropriate measures are taken to protect your personal data.

The categories of recipients may thus be:

Recipients	Purpose of the processing	What security measures are in place for international transfers if the recipient is located outside the European Economic Area?
Service providers for the operation of the DSMS portal and the processing of the data stored or transmitted by the systems (e.g., for data centre services, payment processing, IT security)	The processing is carried out to ensure the operation of the DSMS portal with provision of the web form as well as to ensure IT security, in particular to protect against attacks from the Internet.	No transfer of data to recipients outside the European Economic Area.
Service provider for the support of the DSMS in connection with the use of the web form and other data protection activities (e.g.,	The processing is intended to ensure the processing of requests from data subjects, to receive error messages and to	No transfer of data to recipients outside the European Economic Area.

external data protection officer, data protection coordinator).	answer questions in relation to the use of the web form.	
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We may also transfer your personal data to government agencies, courts, outside counsel and other third parties as required or permitted by law to:

- ensure compliance with applicable law,
- respond to requests from government authorities,
- comply with applicable legal procedures,
- protect and enforce the rights, safety, privacy or property of iwis, website visitors, iwis' customers, our employees, or the public,
- to enable us to pursue any existing legal remedies or to limit any harm we may suffer,
- enforce the terms and conditions of use for the use of the online services we provide; and
- to respond to emergencies.

These transfer operations are permissible according to Art. 6 para. 1 lit. c) and/or Art. 6 para. 1 lit. f) GDPR.

## 9. Video surveillance at the locations

In the explanations below, we inform you of the processing of personal data by the iwis Group in cases where individual persons can be recognised on the basis of recorded images within the framework of video surveillance.

iwis monitors security-sensitive areas inside and outside its buildings and premises by means of video transmission (livestreams). In some cases, video recording is also triggered by motion detectors.

Some cameras protect the iwis premises and the associated building. This makes it possible to quickly assess the perimeter fencing, including the immediate surroundings, at any time without endangering the company's own staff. In principle, general video surveillance of public space is not conducted .

As soon as you are within the detection range of the cameras, you become a subject of this data processing. Camera systems are installed, in particular, in the entrance areas to our business premises, at the barrier and gate systems for the site, at emergency exits, on the outer walls of the business premises as well as at the staff entrance installations. Only static camera systems with a fixed angle setting and without audio recording are used. Signs clearly indicate the presence of all camera systems.

### 9.1 Purposes and lawfulness of data processing

iwis has a legitimate interest in the use of video surveillance (Article 6, paragraph 1, point f GDPR). It makes a significant contribution to ensuring the greatest possible security of buildings and persons in a personnel-friendly manner.

We use video surveillance to pursue the following objectives depending on the circumstances pertaining to the respective locations:

- protection of the premises / the exterior of the buildings against vandalism
- the (necessary) surveillance of alarm-secured doors
- detection of illegal attempts to gain access
- identification of blocked emergency exits
- detection of tampering in relation to production materials or products

Video surveillance makes it possible to initiate immediate countermeasures in the event of infringement of one of the points listed. It serves not only to protect the building, but also to ensure your personal safety.

Local or national regulations also contractually oblige us to conduct video surveillance of specific areas at individual iwis locations. The lawfulness for this surveillance would then be additional to the legitimate interest of iwis.

## 9.2 Retention period

The retention period for the data from the cameras is a maximum of 72 hours.

The recordings are deleted automatically. In the event of an incident, the video recording may be stored separately. A longer retention period will only apply if this is necessary for the pursuance of legal claims or the prosecution of criminal offences in a specific individual case.

## 9.3 Recipients and persons authorized to access the data

Video data is only evaluated on an ad hoc basis. iwis may commission external service providers to evaluate the video surveillance data. In addition to the livestream, these service providers will also have access to recordings from the video cameras in the relevant contractually defined area of responsibility.

In the event of a breach of the company's house rules, the commission of a crime or if required by law, the recordings can or must be handed over to security authorities.