

Privacy policy for employees and applicants

HAHN+KOLB has been a responsible employer for 120 years. Compliance with applicable laws and with other external and internal regulations is a fundamental component of our business activities and decisions. Data protection is a matter of trust and your trust is important to us. We respect your privacy and personal space. This means that lawful collection, processing, use and protection of your personal data is important to us.

During the time of your employment and thereafter, your personal data is processed to establish, conduct and terminate the contractual relationship. This privacy policy will inform you of the processing activities we carry out as part of your working relationship and/or your application.

1. Who is responsible for data processing?

The party responsible for collecting, processing and using your personal data and therefore also for adhering to data protection regulations is

HAHN+KOLB Werkzeuge GmbH
Schlieffenstraße 40
71636 Ludwigsburg, Germany
Telephone: +49 (0)7141 498-40
Email: info@hahn-kolb.de

2. Where do we obtain your personal data?

Personal information we receive directly from you (e.g. during the recruitment process, or during the employment relationship). There are circumstances in which, due to legal regulations, your personal data is also collected in other places. This particularly includes tax-related queries with respective financial authorities and information about periods of incapacity for work with the respective health insurance provider. In addition, we may receive data from third parties (e.g. employment agencies). We also process personal data that we have permissibly obtained from publicly accessible sources (e.g. professional networks).

As part of your employment, you must provide the personal data which is required to establish, conduct and terminate the employment relationship, to fulfil the contractual obligations associated with that relationship or that we are required to collect by law. Without such data, we will usually not be able to conduct the employment relationship with you, since we would not be able to meet our contractual and legal obligations. Disadvantages for you, e.g. in terms of wage payments, social insurance contributions etc. could not be ruled out in such a case.

3. Which of your personal data will we process?

HAHN+KOLB processes the following data categories or parts thereof. Please note that some items in the list may not apply to you. In concrete terms, the data we process depends mainly on the work you perform for HAHN+KOLB.

Please also note that the examples listed in each category are not exhaustive.

- **Applicant data:** e.g. first and last name, suffixes to your name, forms of address, title, academic degree, date and place of birth, age, gender, marital status, number of children, details of training and qualification, language skills, details of guardian status for minor applicants and employees, photo, analyses of potential, personal description, job title, preferred areas of work and activity, possible start date, salary expectations, willingness to travel, citizenship/work permit etc. for selection and recruitment procedures, entry and exit management as well as other personal data that arises in the course of the application process or is provided by you
- **Application documents:** e.g. letter of application, curriculum vitae, diplomas, certificates
- **Applicant visit details:** e.g. appointment (planned start and end), location, visitor's badge number, vehicle registration number, name of the HAHN+KOLB employee visited
- **Personal contact details:** Address, telephone number, mobile phone number, email address (for the purpose of making contact)
- **Work contact details:** e.g. telephone number, mobile phone number, email address, place of work, job title and other information required for addressing through modern communication technologies
- **Contract details:** Salary information, benefits in kind, allowances, lump sums, period of notice, type of employment relationship termination
- **Identification/payment details:** Identity card details, passport details or work permit for identification and establishment of the legitimacy of the relationship, staff number, tax identification number, pension number, health insurance membership, income tax class, social insurance details, tax exemptions, religious affiliation for deduction of church tax, bank details, any attachment of wages (for the purpose of calculating remuneration and meeting social insurance, tax and other obligations), administration of advance payments and loans, salary calculation details, details of capital-forming payments
- **Time tracking data:** Holiday periods, working hours, working time accounts, periods of incapacity, shift schedules, overtime, flexi-time, part-time, etc.
- **Data as part of personnel screening:** depending on the reason this is required, e.g. police certificate, the result of a sanctions list check
- **Data as part of suitability, performance and conduct checks:** Training and education information, data for the purpose of measuring the achievement of objectives, e.g. for variable remuneration components, data from employee interviews, data on breaches of road traffic regulations
- **Other data in the HR department:** Working years, entry and exit date, travel expense accounting data, business travel data, driving license data, driving logs, access monitoring data, maternity leave details, sickness periods, inventory information, data on personnel planning and control, data on occupational integration management, event attendance data, information about permissions and authorisations, data on safety training, data from training and education, any declarations of consent or agreement submitted by you personally
- **IT-related data:** data resulting from the use of IT systems, specifically log data, user data, user identification (login details, user ID), assigned Wi-Fi access data, hardware and software allocated to system users, text documents created and archived with the support of automated processes (e.g. email correspondence)
- **Location data:** Mobile device location services are only used in the event of loss or theft in order to find the device or remotely lock or erase it. HAHN+KOLB does not collect any data from mobile devices or navigation devices in company vehicles, nor does it create employee profiles.

- **Suggestions for improvement:** suggestions for improvement submitted as part of company suggestion scheme, rating of proposals and rating of awards.
- **Image data:**
 - Photo and video recordings as a result of participation in events, e.g. meetings, conferences, training, seminars, corporate events, trade fairs, anniversaries, employee and team events, customer events, etc. (Legitimate interest: to document the history and development of the company)
 - Photos on employee ID cards (legitimate interest: access control)
 - Possible recordings for company websites, print products and other promotional material (voluntary, based on consent)
 - Possible personal photo, e.g. as an avatar for Intranet and Outlook (voluntary, based on consent).

Before any publication of photo and video recordings, consent will be obtained from anyone featured during the recording (i.e. particularly highlighted).

Only in cases where there is a very large number of people or where people feature incidentally in images will consent for publication not be obtained. In these cases, publication will be supported by the legitimate interests of HAHN+KOLB (the legitimate interests in this case are: external representation and maintaining an image through marketing and public relations work).

- **Video surveillance data:** Monitoring of publicly accessible areas on the HAHN+KOLB premises such as customer parking, driveway and entrance areas: e.g. image data (appearance, behaviour), vehicle registration number, location where the recording took place (place, camera site), time of image recording (date, time, start/end of image recording), role of those concerned (e.g. perpetrator, victim, witness)
- **Clothing sizes:** where applicable, clothing and/or shoe sizes (e.g. for work clothes such as safety shoes, trade fair shirts, clothes for photo shoots, etc.)
- **Subject data** (where the rights of the subject are being asserted in accordance with the GDPR): e.g. the particular category, type and content of the request, proof of identity (if necessary), handling of the request, date contact is made and date of completion
- **Accident data** (in the case of a work accident): e.g. accident time, course of events leading to accident, location of accident, health details (e.g. type and severity of injury)
- **Health data:** In certain cases, health data may also be processed, e.g. data in the context of occupational healthcare and occupational health management (accidents at work, work-related illnesses, particular allergies, rehabilitation measures), occupational safety, the severity of any disability, disability ID card data

4. Purpose and legal basis for processing

Your personal data is processed in accordance with the provisions of the GDPR and the German Federal Data Protection Act (BDSG, latest version).

Your personal data will be processed for the following general purposes. Please note that some items in the list may not apply to you. The specific purposes for which we process your data depends mainly on the work you perform for HAHN+KOLB. Please also note that the examples listed for each purpose are not exhaustive.

If we use your personal data for any purpose not listed here, we will inform you of this in advance.

- **Based on your consent** (in accordance with art. 6 section 1 (a) of the GDPR in conjunction with § 26 section 2 of the BDSG, latest version):

If you have provided us with consent to process your personal data, each consent forms the legal basis for processing as specified in each case. This applies in particular to the processing of special categories (outside of contractual measures) or to a longer application storage period (at the express request of the applicant). Based on your consent, we also process your data, e.g. For

- the purpose of representing the company externally
(e.g. images on company websites and in print products)
- In internal IT-based communication systems
(e.g. portrait pictures as an avatar in internal communication platforms or email clients)
- In birthday lists
(so that management and direct supervisors can offer congratulations).

The purposes of processing personal data are derived from your consent – this can also be/have been implied. You can withdraw your consent at any time with effect for the future.

- **In order to fulfil contractual obligations** (in accordance with art. 6 section 1 (b) of the GDPR in conjunction with § 26 section 1 of the BDSG, latest version):

We process your data for the purpose of establishing, conducting and terminating the work or training contract agreed with you, in particular for time recording, capacity planning and calculation of salary and travel expenses (including the calculation and payment of social security contributions).

In addition, collective agreements (group-wide and applying to operations locally or in general, as well as labour agreements) in accordance with art. 88 section 1 of the GDPR in conjunction with § 26 section 4 of the BDSG, latest version, can also be used as legal permission in terms of data protection (e.g. operational agreement for the employee suggestion system).

- **Due to legal requirements** (in accordance with art. 6, section 1 (c) of the GDPR).

We process your data for the fulfilment of various legal obligations in the form of record keeping, reporting and alerting obligations:

- For the creation of commercial and tax reports in accordance with § 257 of the German Commercial Code (HGB), § 147 of the German Tax Code (AO), § 41 section 1 of the German Income Tax Act (EStG)
- For processing income tax in accordance with § 39b of the EStG
- For maintaining working time accounts in accordance with § 7d section 1 line 1 of the German Social Security Code (SGB IV)
- For the documentation of overtime in accordance with § 16 section 2 of the German Working Time Directive (ArbZG)
- For risk assessment in accordance with § 5 of the German Occupational Safety Directive (ArbSchG)
- For occupational health purposes in accordance with § 11 of the ArbSchG
- For health and safety training in accordance with § 12 section 1 line 1 of the ArbSchG



- For recording obligations in line with the German Minimum Wage Law (MiLoG) in accordance with § 17 of the MiLoG
- For documentation of residence permits in line with § 18 of the Residence Act (AufenthG)
- For data protection accounting obligations in accordance with art. 5 and 24 of the GDPR
- In addition, due to European anti-terror regulations 2580/2001 and 881/2002, we may be required to check your details against the "EU terrorist lists" to ensure that no money or other resources are provided for terrorist purposes.
- **To safeguard the legitimate interests of HAHN+KOLB** (in accordance with art. 6, section 1 (f) of the GDPR)
We process your data according to a balance of interests for different purposes such as:
 - Personnel planning, administration, development, management and care, as well as staff accounting (e.g. management of personnel files, training, staff development meetings, employee assessments)
 - In order to avoid unnecessary expenditure and to increase efficiency and effectiveness (e.g. budgeting, financial management, reporting, continuous improvement process)
 - For general business management and further development of services, service provision, product range and to ensure business continuity
 - For customer advice and care, as well as sales
 - For internal communication and for smooth business operation (e.g. the provision of address books and publication of your work contact details on the Intranet)
 - For the organisation and implementation of internal and external events (e.g. seminars, mandatory training, corporate events, department excursions, congresses, trade fairs)
 - For the organisation and implementation of business trips
 - For external representation and maintaining an image through marketing and public relations work, (e.g. standard trade fair clothing, staff magazine, advertising materials, catalogues, direct marketing, publication of photo and video recordings with a very large number of people or people who only appear incidentally in the pictures)
 - For documentation of company history and development, (e.g. photo and video shoots as a result of participation in events such as meetings, conferences, training sessions, seminars, corporate events, trade fairs, anniversaries, employee and team events, customer events, etc.)
 - For the provision and use of IT systems and IT-based communication systems (e.g. telephony, email, chat, video conferencing, appointment scheduling)
 - In order to take an inventory of the IT systems and software provided
 - To ensure IT security (including entry, access and input control) and IT operations
 - To ensure compliance with safety rules, regulations, industry standards and contractual obligations
 - To protect operational and business secrets and operational property
 - For the establishment, exercise or defence of legal claims
 - For protecting the security of premises, for preventive protection against unauthorised entry to the premises/building and for preventive protection of legal interests (e.g. through the use of visitor badges and access control systems or by video surveillance of the premises)
 - In order to avoid other regulatory requirements such as issuing logbooks
 - In order to avoid damage to the company and/or company liability
 - In addition, your data may be processed for the organisation of and participation in private or public events (e.g. sports events such as company runs or football tournaments). Participation in such events and disclosure of any personal data is always voluntary.

- **For the detection of crimes** (in accordance with § 26 section 1 line 2 of the BDSG in its new version):
We may process your personal data if documented evidence indicates that a crime has been committed and where processing is necessary to detect it. We may do this only when your interest in preventing processing for the protection of your personal data does not outweigh this purpose, and in particular when the nature and extent of processing is not disproportionate to the need.
- **Further information about special categories of personal data:**
Where special categories of personal data are processed in accordance with art. 9 section 1 of the GDPR, this takes place as part of the employment relationship for the purpose of exercising rights or meeting legal obligations under labour law, social security law and social protection (e.g. tax-related data on church memberships, health details in respect of health insurance organisations or recording disabilities due to additional leave and the disabled persons' levy). This is conducted on the basis of art. 9 section 2 (b) of the GDPR in conjunction with § 26 section 3 of the BDSG, latest version. In addition, it may be necessary to process health data to assess your ability to work in accordance with art. 9 section 2 (h) in conjunction with § 22 section 1 b) of the BDSG, latest version.
In addition, the processing of special categories of personal data may be based on consent in accordance with art. 9 section 2 (a) of the GDPR in conjunction with § 26 section 2 of the BDSG, latest version (e.g. operational health management).

5. Who receives your personal data?

Transfer of data only occurs if legal regulations allow or require the transfer, you have consented to the transfer or we are authorised to pass on the data for other reasons

- **Internal:** Employees, departments, the works council and the staff canteen all receive data within our company. This data is required for the purposes mentioned above and the parties are authorised to process this data.
- **Within the WÜRTH group of companies:** Within the WÜRTH Group, your data will be sent to specific companies if those companies conduct data processing tasks centrally for the Group (e.g. salary calculation, support and management of occupational pensions, recruiting platform, fleet management, cloud services, planning and implementation of events and business travel)
- **External:** Outside our company and the WÜRTH Group, regular recipients of your data are, for example, business partners (work contact details to suppliers, service providers, interested parties, customers, consultants and assessors), travel agencies, hotels and airlines (for business travel), vocational schools, universities and other education and training providers, job centres, auditors, legal representatives, patent attorneys, tax advisors, courts, supervisory authorities, banks, company doctors, external security specialists, classification bodies, certification bodies and auditors, funding bodies, health insurers, health, social and accident insurers as well as other insurance companies.
- **Data processors:** Beyond this, data processors engaged by us may, according to art. 28 of the GDPR, receive data in addition to other service providers (e.g. data centre service providers, IT partners, document shredders, printers and advertising service providers). These data processors are contractually bound by us to maintain corporate secrecy and to comply with the stipulations of the GDPR and the Federal Data Protection Act (BDSG) in its latest version. Data processors may be third parties or other companies within the WÜRTH Group.
- **Public bodies and institutions:** In certain cases, we also provide data to public bodies and institutions (e.g. supervisory authorities, financial authorities, social insurers, employment agencies, registrars, health authorities, road traffic authorities, research institutions, universities, patent offices, embassies and consulates), as well as to creditors, representatives of creditors, third-party debtors in the case of wage and salary garnishments, insolvency administrators in the event of a personal bankruptcy, to bodies in order to make capital-forming payments, and to bodies that manage claims arising from occupational pension provision.



6. Is your data transmitted to third countries or international organisations?

If, in order to process your data for an intended purpose, it is necessary in an individual case to transmit relevant data to a recipient outside the EU/EEA, the appropriate level of protection is generally determined by an adequacy decision of the European Commission, by inter-company or external agreements based on standard EU data protection clauses (in accordance with art. 46 section 2 (c) and (d) of the GDPR) or by the provision of a GDPR exception for that specific case (in accordance with art. 49 section 1 of the GDPR, e.g. the transfer is required for the fulfilment of the contract between you and HAHN+KOLB).

7. How long do we store this data?

Personal data is stored by us only as long as it is required for the fulfilment of the respective purposes or to meet our contractual or statutory obligations.

We are subject to various retention and documentation requirements. These arise from the German Commercial Code (HGB), the Tax Code (AO), the Money Laundering Act (GwG) and the Income Tax Act (EStG). The retention periods specified herein are usually up to 10 years. For some categories of data such as occupational retirement pensions, these can be 30 years or more. It is also possible that personal data is stored for the period during which claims may be brought against us (statutory limitation period of 3 or up to 30 years).

Assuming you consent, we store and process your personal contact details even after the employment relationship has ended in order to contact you during your retirement as a "HK pensioner" (e.g. to invite you to certain company events and send you our employee magazine).

8. Automated individual decisions

In certain areas, we use automated procedures for decision-making. Fully automated decision-making (including profiling) as defined in art. 22 of the GDPR does not take place, however. Should this become the case in the future, we will inform you separately.

9. Special conditions of the application process

9.1. Where do we obtain your personal data?

If you apply for a job with us, we will initially use the data you submit through the recruitment platform, though it can also be obtained in the course of the application or engagement process (e.g. through an assessment centre) or from publicly accessible sources (e.g. professional networks).

For the application process, we do not require any special categories of personal data from you ("sensitive data"). For this reason, please do not send us any such information, e.g. information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and no health details (e.g. illnesses, social insurance number).

9.2. Purpose and legal basis for processing

We use this data to carry out the application process (e.g. to evaluate and process incoming applications, conduct interviews, conduct candidate selection, agree an employment contract) and to contact you as part of this process. In particular, we also use it to check your suitability for the position you have applied for, or for other vacancies in our company where applicable.

You do not have to provide us with personal data. However, if you do not supply any data, we cannot process your application.

In addition to the legal bases mentioned above, processing is carried out to conduct pre-contractual activities in accordance with art. 6 section 1 (b) of the GDPR as well as for making a decision regarding the establishment of an employment relationship in accordance with § 26 para. 1 line 1 of the BDSG in its latest version. If you also

provide us with special categories of personal data (sensitive data), we process this on the basis of your explicit consent (art. 9, section 2 (a) of the GDPR).

These legal bases allow us to process the data required to make a decision regarding the establishment of an employment relationship. If data should be required after the application process for the purpose of legal action, this data processing occurs on the basis of legitimate interests in accordance with art. 6, section 1 (f) of the GDPR. Our legitimate interest in further processing is then the establishment or defence of claims.

9.3. How long do we store this data?

If your application leads to the formation of an employment relationship, your personal data will be processed further for the purpose of implementing that employment relationship and your application data will be held in our personnel files.

If your application does not lead to the formation of an employment relationship, the application documents will be deleted six months after notification of the decision not to employ you. This will occur only if the deletion does not contravene any other legitimate interests on the part of HAHN+KOLB or any statutory retention periods. Another legitimate interest in this sense would be, for example, the requirement to submit evidence to a proceeding under the General Act on Equal Treatment (AGG).

9.4. Who receives your personal data?

As part of the application procedure, access to your data is granted to those employees of our company involved in the application process. This includes employees of the HAHN+KOLB HR department. These employees will see and edit your application after submission. Managers of the department in which the vacancy is located will also have access to your application data.

As far as this is necessary to fulfil the processing purposes, personal data is sent to data processors (e.g. IT service providers). These may be third parties or other companies within the WÜRTH Group. No more data is ever passed on than is required. Where possible, your personal data will not be passed on.

10. Information about your rights

If you are dissatisfied with the data protection measures indicated here or if you have further questions regarding the collection, processing and/or use of your personal data, please contact us. We will answer your questions as quickly as possible and try to put your suggestions into practice. You have the right to access, rectify or erase your data or restrict the processing of your data, as well as the right to data portability and to lodge an objection. In order to do so, please contact our data protection officer:

HAHN+KOLB Werkzeuge GmbH
Data Protection Officer
Schlieffenstraße 40
71636 Ludwigsburg, Germany
Email: Datenschutz@hahn-kolb.de

However, please note that HAHN+KOLB may not always be obliged to meet a request for deletion, restriction or data portability, or to accommodate an objection. Each case will be evaluated individually based on the statutory obligations of HAHN+KOLB and any applicable exceptions. If we (also) process your data for advertising purposes, you can object to this processing for the purpose of direct marketing at any time. If this processing is conducted on the basis of your consent, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out on the basis of that consent before it is withdrawn.

If you believe that the processing of your personal data contravenes data protection laws or that your legal rights to data protection are not being met for another reason, please inform your contact person at HAHN+KOLB or contact our data protection officer directly so that we can resolve the issue. You also have the right to lodge a complaint with a data protection supervisory authority at your residence, place of work or at the location of the alleged infringement.

- **Right to information** (in accordance with art. 15 of the GDPR):
You have the right to request, free of charge, information on whether personal information is stored about you, what the data is and the purpose for which it is stored.
- **Right to rectification** (in accordance with art. 16 of the GDPR):
You have the right to request the immediate correction of any incorrect personal data held about you. Taking into account the purpose for which your personal data is processed, you have the right to request the completion of any incomplete data, including by means of a supplementary declaration.
- **Right to erasure – "right to be forgotten"** (in accordance with art. 17 of the GDPR):
You have the right to request that your data be erased immediately. HAHN+KOLB is obliged to immediately erase personal data where one of the following reasons applies:
 - Purposes for which the personal data was collected no longer apply
 - You revoke your consent for processing and there is no other legal basis for processing
 - You object to processing and there is no other legal basis for processing
 - The personal data has been processed unlawfully
 - Erasure of the personal data is necessary to fulfil a legal obligation in accordance with EU law or the law of the member states to which HAHN+KOLB is subject as the responsible party
- **Right to restriction of processing** (in accordance with art. 18 of the GDPR and § 35 of the BDSG in its latest version):
You have the right to request that processing of your data be restricted if any of the following conditions is met:
 - You are disputing the accuracy of your personal data
 - Processing is unlawful but you do not wish for your data to be erased
 - Personal data is no longer required for the purposes for which it was processed, but you require the data for the establishment, exercise or defence of legal claims
 - You have lodged an objection to the processing of your personal data in accordance with art. 21, section 1 of the GDPR. Processing will be restricted until it is determined whether the legitimate interests of HAHN+KOLB are sufficient.
- **Right to data portability** (in accordance with art. 20 of the GDPR):
You have the right to obtain your data from us in a structured, commonly used and machine-readable format. We must not prevent you from forwarding this to another responsible party.
- **Right to object** (in accordance with art. 21 of the GDPR):
At any time and for reasons relating to your own situation, you have the right to lodge an objection to the legitimate processing of your personal data. Where an objection is lodged, we will no longer process your personal data unless we can prove that there are urgent and compelling reasons to process it that outweigh your interests, rights and freedoms, or if its processing is required for the establishment, exercise or defence of legal claims.
- **The right to appeal to the supervisory authority** (in accordance with art. 13 section 2 (d), 77 of the GDPR in conjunction with § 19 of the BDSG in its latest version):
If you believe that the processing of your personal data contravenes data protection laws or that your legal rights to data protection are being infringed for any other reason, you may lodge a complaint with a data protection supervisory authority at your residence, place of work or at the location of the alleged infringement.
- **Withdrawal of consent** (in accordance with § 26 section 2 of the BDSG in its latest version):
Any consent can be withdrawn at any time and independently of any other consent. As a result, we will cease processing your data for the purposes mentioned above from the point you withdraw consent, and the respective rights, benefits etc. associated with this can no longer be asserted. We keep an record of your withdrawal for documentation and verification purposes.

11. Further information:

We hope that this privacy policy clarifies the personal data that HAHN+KOLB processes and its purposes in doing so.

From time to time, this privacy policy for employees of and applicants to HAHN+KOLB may be updated to reflect the current situation in respect of new technologies and continuous further development of procedures and data processing methods. We therefore recommend that you check the privacy policy at regular intervals for the latest version.