

Privacy Agreement LWSUK Updated: September 2022

Aims and Objectives

With this notice, we would like to inform you about the processing of your personal data by LEONI within the employment relationship and give you an overview of your rights in accordance with data protection laws.

Scope

This data protection notice is addressed to all employees as well as other persons working on behalf of LEONI Wiring Systems UK Ltd. ("LEONI", "we", "us").

Table of Contents

1	Responsible for Data Processing.....	3
2	Description of Data Processing, Relevance and Source of Data.....	3
3	Processes for Legal Basis for Data Processing.....	3
4	Recipient for Data.....	4
5	Data Transfer to a Third Country.....	5
6	Your Rights.....	5

Responsible for data processing

Responsible for data processing is:

LEONI Wiring Systems UK Ltd.
Lower Milehouse Lane Newcastle-under-Lyme
Staffordshire ST5 9 BT
United Kingdom
Telephone +441782604200

Description of data processing, relevant data and sources of data

LEONI processes personal data which it receives from you or has obtained when establishing the employment relationship. In addition, LEONI processes – to the extent necessary for the employment relationship – personal data from publicly accessible sources (e.g. professional networks on the Internet) or data received from third parties (e.g. authorities, institutions based on legal provisions as well as LEONI AG). The following (categories of) data may be processed: contact data (e.g. name, address, telephone number, e-mail address etc.), health data, employment data (employment contract, level of employment, function), social security data, bank data, salary data, absences (e.g. holidays, leave, etc.), education and qualification data, pension data, IT data (e.g. employee identifier, hard- and software, access rights etc.), participation in internal meetings, internal investigation files and reported complaints, previous employer data, performance evaluations data, life insurance data, work schedule, travel expenses and reports and travel details as well as reimbursement of travel expenses.

Purposes and legal bases for data processing

LEONI processes your personal data for *inter alia* the following purposes and bases its processing on legal grounds in accordance with the United Kingdom General Data Protection Regulation (UK GDPR) and other applicable data protection laws.

Performance of contractual obligations

(Art. 6 para. 1 lit. b UK GDPR)

- Performance of pre-contractual measures during application procedure;
- Establishment, performance or termination of the employment relationship, which includes processing of absences, vacations and leaves;
- Processing required for payroll, including reimbursement of expense;
- Administration of documents relating to the employment relationship (personnel file);
- Evaluation and performance reviews;
- Provision and administration of IT equipment and systems necessary to perform your daily tasks;
- Travel management

Legitimate interests of LEONI

(Art. 6 para. 1 lit. f UK GDPR)

- Measures relating to personnel development planning;
- Measures relating to organisational changes;
- Establishment, exercise and defence of legal claims;
- Ensuring the IT security and operation of IT systems;
- Prevention and investigation of criminal offences or serious breaches of duty;
- Measures for site security and access control;
- Personnel measures required in the context of a (partial) sale of a company;

- Measures in connection with a change of job within the group of companies or leaving the company.

If LEONI processes your data according to its legitimate interest, you have the right to object according to Art. 21 UK GDPR. For more details, see below section 7 “Your rights”.

Based on consent (Art. 6 para. 1 lit. a UK GDPR)

For certain purposes, LEONI will process your data, based on your consent. You can withdraw your given consent at any time for the future without a reason by contacting your Human Resource Department.

Based on legal requirements (Art. 6 para. 1 lit. c UK GDPR)

- Tax related processing;
- Other legal obligations deriving from social security contributions

Special categories of personal data (Art. 9 UK GDPR)

To the extent required, LEONI may process special categories of personal data (e.g. health data) within the context of the employment relationship (e.g. the processing of health data may be necessary for assessing your ability to work) as well as for the exercise of rights or the fulfilment of legal obligations on the basis of Art. 9 para. 2 lit. b UK GDPR.

Recipient of data

Within LEONI, certain departments and persons require to process employee personal data on a need-to-know basis, in order to fulfil LEONI’s contractual and legal obligations. Furthermore, trusted third party service providers contracted by LEONI may also receive data for the aforementioned purpose. In particular, these are *inter alia*, service providers for payroll, accounting, occupational healthcare, pension, audits, time recording, insurance, training, IT services, logistics, printing services, advisory and consulting services as well as other entities of the LEONI Group if applicable. Our parent company, LEONI AG, acts as an IT service provider for us and processes employee data on our behalf, in particular to give you access to our IT systems. Furthermore, your personal data may be transferred within the LEONI Group to other countries (third countries) for purposes of group management, internal communication, compliance, audit and other administrative purposes. LEONI only shares your data to recipients outside LEONI if there is a legal basis for the data transfer and appropriate data transfer mechanisms are implemented. If we cooperate with certain institutions (e.g. universities) we will pass on your data to them. These institutions have been contractually obligated to comply with data protection.

If you have any questions concerning the recipients of your data, please reach out to your HR.
Duration of data storage

All data collected by us will be destroyed or deleted as soon as it is no longer required for the establishment, implementation or termination of the employment relationship or our legitimate interest in processing no longer outweighs your interests worthy of protection. We also delete data if you have revoked your consent to the processing of your data and legal retention periods do not prevent the deletion.

Legal retention and documentation obligations may arise from commercial law and fiscal law, among other things, and may last 6 to 10 years. In addition, we may have to observe statutory periods of limitation for the storage period. Further storage of your data is also permissible insofar as further contractual obligations such as the preparation of references or letters of reference are to be fulfilled or the further processing is necessary for the assertion, exercise or defence of legal claims after we have weighed up the interests.

Data transfer to a third country

LEONI transfers data to third countries only and insofar as appropriate data transfer mechanisms according to Art. 44 ff. UK GDPR are implemented.

Your rights

You have the right to:

- **access your data as well as receive a copy of your data** (Art. 15 UK GDPR);
- **rectification** (Art. 16 UK GDPR) and **erasure** (Art. 17 UK GDPR);
- **restriction of processing** (Art. 18 UK GDPR);
- **data portability** (Art. 20 UK GDPR);
- **object** (Art. 21 UK GDPR), if the data is processed pursuant to Art. 6 para. 1 lit. f UK GDPR;
- **lodge a complaint** (Art. 77 UK GDPR) with a supervisory authority if you believe that the processing of your personal data infringes applicable data protection regulations. Your right to lodge a complaint may be enforced in the member state of your habitual residence, place of work or the place of the alleged infringement.