

## Information sheet on the processing of employee data

The purpose of this document is to inform you about the processing of your personal data and of your rights according to data protection regulations.

### Who is the data controller and who is the data protection officer?

The LWS UK Data Controller is your employer:

LEONI Wiring Systems UK Ltd  
Lower Milehouse Lane  
Newcastle  
Staffs ST5 9BT  
Tel No +44 (0) 1782 604200

LEONI AG Data Protection Officer is:

Corporate Data Protection  
Marienstraße 7, 90402 Nuremberg  
datenschutz@leoni.com  
Tel No +49 (0) 911-2023-390  
[data-protection@leoni.com](mailto:data-protection@leoni.com)

### Which of your personal data do we have and where do they originate from?

'Personal data' is information that could enable an individual to be identified.

As part of the employment relationship, we process the following personal data:

- Your master data (such as first name, surname, other names, date of birth, gender, where necessary work permit/residency permit (if applicable), driving licence information, passport details and employee number)
- Private contact details (such as home address, (mobile) telephone number, e-mail address, emergency contact)
- Business contact details and data on the organisation (cost centre, position, etc.)
- Incoming log data when using IT systems
- Attendance/Absence Data (including periods of leave, period of incapacity to work, etc.)
- Performance data and/or results of your work, evaluations including targets and bonus calculations
- Where necessary, data on disabilities
- If any, data on talent management, succession planning, training
- Data for the calculation of remuneration and payment (such as bank details, social security number, pension fund number, salary data, tax code, court orders)
- Special categories of personal data (such as health, disability)

Your personal data will generally be collected directly from you as part of the recruitment process or during the course of your employment relationship. In certain cases, we may collect personal data concerning you from other bodies on the basis of statutory provisions. These may include official government bodies, and external referees. During the period of your employment personal information will be processed between other third parties such as the external payroll provider, the healthcare providers, the occupational health provider and the pension scheme providers.

## For what purpose and on what legal basis are data processed?

We process your personal data in consideration of the provisions of the EU General Data Protection Regulation (GDPR), as well as to comply with other applicable laws and contractual requirements.

In the first instance, the data processing is for the purposes of establishing, performing and terminating your employment relationship.

We will also process your data in order to be able to meet our statutory obligations as an employer, particularly in the area of financial and social security law. For example, on the basis of the European anti-terror regulations, we are obliged to compare your data against the "EU terror lists" in order to ensure that no funds or other economic resources are provided for terrorism purposes.

Where required, we will also process your data within the LEONI Group in order to pursue our day to day business. This applies particularly for the purposes of Group controlling, internal communication, compliance, auditing and other administrative purposes.

Where special categories of personal data applicable to GDPR are processed, this is in order to exercise rights or to meet statutory obligations within the scope of the employment relationship under employment law, social security law and social protection (e.g. supplying/requesting information on employee health and fitness). The processing of special categories of personal data may require your consent.

Should we wish to process your personal data for a purpose not mentioned above, we will inform you thereof beforehand.

## How long will your data be stored?

We will delete your personal data once it is no longer required for the above purposes. After termination of the employment relationship, we shall continue storing personal data which we are obliged to retain by law. The storage and disposal periods will be in accordance with statutory law. It may also occur that personal data is retained for a period in which claims are made against us or could be made against us in accordance with statutory limits.

## Who receives your data?

Only company employees or third parties who require your data to meet our contractual and statutory obligations will receive your personal data.

Your data will also be transferred to certain companies within our LEONI Group of companies if these undertake data processing tasks for the companies affiliated to the Group on a centralised basis.

We also use various service providers in order to fulfil our contractual and statutory obligations for example Travel Management, Car Rental etc.

We may also transfer your personal data to other recipients outside the company insofar as this is required to meet our contractual and statutory obligations as an employer. In particular, these are:

- Authorities (e.g. pension provider, occupational pension schemes, social security institutions such as DWP and HMRC, finance authorities, courts)
- Employee's bank

## What rights can you assert as a data subject?

You have the right to:

- a copy of your personal data held
- have your data corrected if found to be inaccurate or incomplete
- have your data deleted or removed if it is no longer necessary
- restrict the processing of your data
- withdraw any consent you have given in respect of your personal data
- obtain and reuse your data for your own purposes.

To do this please contact:

Paula Davenport,  
Human Resources (Data Protection Co-ordinator),  
LEONI Wiring Systems UK Ltd,  
Lower Milehouse Lane,  
Newcastle under Lyme,  
Staffordshire  
ST5 9BT

Tel: 01782 604258

E-mail [paula.davenport@leoni.com](mailto:paula.davenport@leoni.com)

## Right to object

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If we process your data to pursue legitimate interests, you can object to this processing on grounds relating to your particular situation. We will then no longer process your personal data unless we can provide evidence of compelling legitimate grounds for the processing, which outweigh your interests, rights and freedoms or the processing serves to assert, exercise or defend legal claims.

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## Where can you lodge a complaint?

You may contact the above named data protection officer or a data protection supervisory authority if you wish to lodge a complaint. The data protection supervisory authority responsible for the UK is:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### Will your data be transferred to a third country?

We may transfer personal data to service providers or Group companies outside the European Economic Area in the following countries:

- Countries in which LEONI maintains facilities: Egypt, Brazil, China, India, Japan, Mexico, Morocco, Paraguay, Russia, Serbia, South Korea, Tunisia, Ukraine, USA, United Arab Emirates
- Countries with a level of data protection recognised by the EU Commission: Canada, Switzerland

The data protection level is then guaranteed by EU standard contractual clauses, which reflect European data protection law.

### Are you obliged to provide your data?

As part of your employment, you must provide the personal data which is required for the establishment, performance and termination of the employment relationship and the fulfilment of the associated contractual obligations, or which we are required to collect by law. Without this data, we will not be able to perform the employment contract with you.

### To what extent do automated individual decisions or measures for profiling take place?

We do not use any purely automated processing processes in order to make decisions.

### Updates to this notice

We may update or amend this privacy notice from time to time to comply with law or to meet changing business requirements. You will be notified of any changes.

This privacy notice was last updated in August 2020.

Issued by: Paula Davenport, Human Resources (LWS UK Data Protection Co-ordinator)

Date: 31st May, 2018 (Updated 12th August, 2020)