

Data Protection Notice for Employees & Applicants of Schaffner EMV AG and Schaffner Holding AG

Version history

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Table of contents

- 1 Preamble 4**
- 2 Initial situation..... 4**
- 3 Your rights 4**
 - 3.1 Data issue and data transfer 4
 - 3.2 Information about the processing of your personal data 4
 - 3.3 Revocation of your consent 4
- 4 Description of the processing of your personal data 4**
- 5 Purposes of the processing and conditions 6**
 - 5.1 Purpose of the employment relationship 6
 - 5.2 Other purposes..... 7
 - 5.3 On the basis of the employee's consent..... 7
 - 5.4 Compliance with the legal obligations..... 7
- 6 Duration of the data storage 7**
- 7 Data transfer and use of order processors 8**
- 8 Transfer of personal data to third countries 8**
- 9 Transfer of personal data to third parties 8**
- 10 Amendment to this data protection notice 8**

1 Preamble

The company responsible for processing the personal data described below is:

Schaffner EMV AG & Schaffner Holding AG
Industrie Nord
Nordstrasse 11e
4542 Luterbach
Switzerland

E-mail: privacy@schaffner.com

(Hereinafter referred to as Schaffner)

2 Initial situation

In order to protect employees and in particular employees' data, SCHAFFNER has developed the HR Data Protection Notice, which lists, amongst other things, the requirements, purposes, rights and principles of processing, disclosure, publication and storage.

3 Your rights

3.1 Data issue and data transfer

You have the right to receive a copy of your personal data in a common electronic format, provided that we process the data automatically and that it is processed with your consent or in direct connection with the conclusion or processing of a contract between us.

3.2 Information about the processing of your personal data

You have the right to be informed whether SCHAFFNER processes your personal data and you have the right to receive the following information when your data is processed:

- The processed personal data as such;
- The processing purpose;
- The retention period of the personal data or, if this is not possible, the criteria for determining that duration;
- The information available on the origin of the personal data, unless it has been obtained from you;
- The existence, where appropriate, of an automated individual decision and the logic on which the decision is based;
- Where appropriate, the recipients or categories of recipients to whom the personal data is disclosed;
- States in which your personal data is transferred.

Your rights under 3.1 and 3.2 may be restricted in individual cases due to overriding interests of third parties or legal provisions. Unjustified (i.e. purposes violating data protection guidelines or blatantly awkward) requests can be rejected. In addition, there may be further restrictions in the event of an overriding interest of SCHAFFNER and a failure to pass it on to third parties.

3.3 Revocation of your consent

If we process your personal data on the basis of your consent, you have the right to revoke your consent at any time. This does not affect the legality of the data processing before the revocation.

4 Description of the processing of your personal data

Data source	Data	General purposes
Application documents and	All information provided in the application form, in the CV (curriculum vitae), in the cover letter or in other documents as well	Assessment of the suitability of an

<p>application communication including all accompanying documents and data as well as the data in the general application profile</p>	<p>as within the scope of further communication. In addition, all information for a direct job application and for the selection of the applicant to be included in the candidate pool.</p> <p>Personal information and identification data such as name, personal and business address, personal and business telephone number, personal and business e-mail address or other contact details, date and country of birth and place of birth.</p> <p>Personal data relating to the family and social circumstances such as gender, age and marital status.</p> <p>Personal data such as the country of residence, nationality, photo, work and residence permits, immigration status and information about residence status, current or desired salary.</p> <p>Qualifications and certificates, including current and previous positions, training and continuing education courses, CV, records of training and work results, in some cases: Contact details of reference persons and results of aptitude assessments and interview assessments/feedback.</p>	<p>applicant for a job (328b Code of Obligations).</p>
<p>Employment contract, introductory questionnaires and forms, data generated by the employee or about the employee during the employment relationship</p>	<p>Personal information and identification data such as name, personal and business address, personal and business telephone number, personal and business e-mail address or other contact details, date and country of birth.</p> <p>Personal data relating to family and social circumstances, such as gender, age, marital status (including the name and contact details of the emergency contact).</p> <p>Employment-related personal data such as employee number, signature, employment status, social security and tax number, insurance number, country of residence, nationalities, photo, emergency contacts and passport details, work and residence permits, immigration status and residence status information.</p> <p>Qualifications and certificates, including current and previous positions, training and continuing education courses, CV, records of training and work results, in some cases: Contact details of reference persons and results of aptitude assessments and interview assessments/feedback.</p> <p>Job information and work metrics such as position, title, employment contract, manager, job area, performance history, employment status, absence information, time and attendance, training documents, performance and development goals. In some cases, we may also record skill assessment results, safety reports and incidents and professional feedback.</p> <p>Payroll, allowance, benefit and expense data such as salary details, payroll data, pension plan number and contributions, fringe benefits, bonuses, severance payments, stock options, relatives, beneficiaries or information on health insurance benefits, account statements, expense claims and reports, bank account details, credit card details, telephone costs and insurance data.</p> <p>Electronic identification data and information (if the employee has access to or is affected by such systems or applications), such as access protocols, IT and Internet usage, device identifiers (mobile device ID, PC ID, etc.), registration and login data, IP address, tracking and analysis data, recordings (e.g. voicemail/call recordings), contributions to corporate platforms, password recovery data, information obtained through IT security tools.</p> <p>When using your own or business mobile devices connected to the SCHAFFNER applications, device data is collected to monitor technical security (including the apps installed on the devices as well as location data for emergencies or if the device is lost).</p>	<p>The data is processed as far as this is necessary within the scope of the employment relationship (328b Code of Obligations) and in order to enable efficient business operations. In certain cases, employee consent is obtained, such as the use and publication of photos/videos for business purposes.</p>

Financial and other details such as account information, credit checks, payment details and transactions, investigative information, and disciplinary history.

Other personal data, especially if the employee or others (e.g. colleagues) register this data on or in SCHAFFNER's systems, programs and applications, such as business documents that contain personal information (e.g. enquiries, questions, complaints, orders and related documents, e-mails, reports, contracts, presentations, records, work products), photos, images and/or videos.

Affiliation with a religious community (e.g., if required for tax purposes);

Health and medical information, including disability status, special working conditions (e.g. use of a standing desk) and medical equipment needed at the workplace, information on work-related injuries and illnesses, data for emergency assistance when travelling (blood type, medical history, allergies). This data is also processed within the scope of occupational health management;

Race or ethnicity (for example, when used for diversity purposes); and

In some very limited cases: Trade union membership, political opinions and sexuality or sexual orientation (e.g. when used to investigate inequality).

Data on criminal convictions and criminal offences in order to comply with legal and contractual requirements.

Regardless of this, there may always be circumstances in which we process personal data about you that are not mentioned here or whose purposes are not mentioned here. In such cases, we will inform you separately about the data protection associated with the respective processing, insofar as this is required by law.

5 Purposes of the processing and conditions

The following subsections describe why and under what conditions SCHAFFNER processes personal data.

Particularly sensitive personal data is processed by SCHAFFNER only in accordance with the applicable law:

- With the express consent of the employee for certain activities in accordance with the applicable law;
- If this is necessary to exercise rights under employment, social security or social protection laws or collective agreements or for preventive and occupational medicine or the assessment of an employee's fitness to work; or
- To the extent necessary for the establishment, exercise and defence of legal claims; and
- Personal data relating to criminal convictions and criminal offences will only be processed by SCHAFFNER if this is permitted by law. Other legal grounds for the processing of personal data may be contained in applicable Swiss and international primary and secondary laws, regulations or binding industry standards.

5.1 Purpose of the employment relationship

SCHAFFNER processes personal data for the decision on the establishment of an employment relationship or - after the establishment of the employment relationship - for its execution or termination. The specific purposes of the data processing depend on the respective company process and the phase of the employment relationship. The processing in this context is limited to what is required or required by law for the establishment and execution of the employment relationship.

5.2 Other purposes

SCHAFFNER may also use personal data to safeguard its interests or the interests of third parties, provided that the employee's own data protection interests do not prevail. This is done for example for the following purposes:

- Voluntary services (e.g. newsletter, company car/leasing);
- Internal publications (e.g. anniversaries, promotions, etc.); and
- Risk and compliance controls.

SCHAFFNER's interest in the specific processing of data is based on the above-mentioned purposes. These must be proportionate and are usually based on the employee's employment relationship, which includes additional legal and regulatory obligations that SCHAFFNER must fully comply with.

5.3 On the basis of the employee's consent

In exceptional cases, SCHAFFNER obtains the employee's consent to the processing of personal data. This applies in particular to any consent of the employee, e.g. regarding:

- Publication of employee photos/information on personal details/career history on the SCHAFFNER homepage;
- Processing of particularly sensitive personal data
- Storage of passport copies.

If SCHAFFNER asks employees for their consent to the use of personal data for a specific purpose, SCHAFFNER informs employees that they can revoke their consent at any time. Consent is voluntary.

5.4 Compliance with the legal obligations

SCHAFFNER is subject to various Swiss and international primary and secondary legal, regulatory or industry-specific requirements under which SCHAFFNER must process personal data. Retention, reporting and information obligations as well as independence rules are relevant here and relate to the employment relationship with the employee, insofar as these are imposed on SCHAFFNER by national authorities such as tax and employment offices, social security institutions as well as supervisory and control authorities. The aim is to comply with legal and regulatory obligations.

6 Duration of the data storage

Where necessary, SCHAFFNER processes personal data for the duration of the employment relationship, which may also refer to its establishment and termination. In addition, SCHAFFNER is subject to various retention, documentation and long-term archiving obligations, which arise in particular from the Swiss Code of Obligations, the relevant employment law, other applicable laws and regulations as well as from further secondary laws. The retention period is ultimately also determined by the statutory limitation periods and is usually ten years, whereby certain tax data must be archived for 10-20 years. At the same time, applicable data protection laws require that SCHAFFNER no longer stores personal data in an identifiable form than is required for the purpose for which the personal data is processed. By adapting IT applications and defining guidelines, SCHAFFNER ensures that personal data is deleted or anonymised when it is no longer needed. In the case of anonymisation, the data is only available to SCHAFFNER in the form of so-called metadata without direct personal reference for statistical evaluations (e.g. proportion of male and/or female applicants, number of applications in a certain period, etc.).

If you have agreed to be included in our talent pool (without applying for a specific job), we will retain your application and personal information for 12 months after creating the profile. After 12 months, we will inform you about the pending deletion and you have the option of agreeing to further storage. If this is not done, the data will be automatically deleted and the user account will be closed.

Upon expiry of an applicable retention period, SCHAFFNER will securely delete or anonymise personal data, unless there are special circumstances that require SCHAFFNER to retain the personal data, for example due to legal or regulatory obligations or to settle possible cases. For more information about the specific retention periods that apply to your personal data, please contact the Data Protection Officer.

7 Data transfer and use of order processors

SCHAFFNER has contracted the following categories of order processors to enable its business activities and processing operations as described above:

- Data centres and IT service providers;
- Providers of hosting, backup and database services;
- SaaS applications for management, communication and accounting;
- Communication service providers;
- HR, tax, financial, IT and accounting consultants

These service providers have access to your data only to the extent necessary for the performance of their tasks. These service providers are obliged to process your data within the scope of the order processing agreement concluded by SCHAFFNER and are subject to SCHAFFNER's instructions. The relevant IT applications are provided by Schaffner EMV AG in Switzerland as a shared service. Further shared services can be provided from other EU countries. The Inter-Group Data Transfer Agreement is used for the transfer of personal data and to ensure the appropriate level of data protection within the scope of the service delivery by Group companies. The Adequacy Decision of the Federal Council (Art. 16, para. 1 Swiss Data Protection Act) confirms that data processing in the EU fulfils an equivalent level of data protection as in Switzerland.

8 Transfer of personal data to third countries

For recipients in countries without adequate protection, SCHAFFNER applies EU standard contractual clauses (incl. FDPIC regulations (Federal Data Protection and Information Commissioner)), binding internal company regulations or other measures to ensure an "appropriate level of protection" in accordance with the statutory requirements. Data transfers can take place worldwide.

9 Transfer of personal data to third parties

In order to provide its services, SCHAFFNER may pass on personal data to third parties such as subsidiaries, Schaffner Group companies or other relevant third parties (TE Connectivity Ltd.). Such a transfer is strictly limited to the data required in each case. These parties will provide you with a separate data protection notice containing further information about the processing of their personal data. In most cases, such personal information is limited to business contact information or work products that contain such information. Data transfers to leasing partners may occur as part of the provision of company cars/leasing. In this case, the partner is an independent responsible company, i.e. the partners' data protection notices apply.

10 Amendment to this data protection notice

SCHAFFNER reserves the right to occasionally amend this data protection notice to comply with the current legal requirements at any time or to implement changes to SCHAFFNER services. The new data protection notice will then apply immediately after its publication.