

Data protection notice
for the processing of personal data in the context of the
MAHLE Microsoft 365 Business Standard Applications
in accordance with Art. 13 GDPR

1. The controller for the purposes of the EU General Data Protection Regulation (GDPR) is:

MAHLE International GmbH
Pragstr. 26 - 46
70376 Stuttgart

2. Data protection officer:

MAHLE GmbH
Corporate Data Protection Officer
Dr. Alexander Deicke
70376 Stuttgart
Germany
e-Mail: cdpo@mahle.com

3. MAHLE Microsoft 365 Business Standard Applications

We hereby inform you about the processing of your personal data within the scope of your activity as an employee of the MAHLE Group by the following products ("MAHLE Microsoft 365 Business Standard Applications") of Microsoft Corporation, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland ("Microsoft").

Purposes of data processing

The processing of your personal data by the MAHLE Microsoft 365 Business Standard applications takes place in order to enable you to perform your daily work (e.g., writing/receiving e-mails, work planning, task processing, documentation, etc.) to facilitate and promote collaborative work with other employees and external persons (e.g., (video) telephony, virtual meetings, chat, data exchange and data exchange and editing, etc.), creating and participating in surveys and making video recordings.

Legal basis of data processing

In principle, we process the following personal data for the execution of your employment contract with your MAHLE employer acc. Article 6 I b) GDPR. If further personal data are processed that go beyond the extent necessary for the execution of the employment relationship, the legal basis is:

- In the case of your consent, Article 6 I a) GDPR and
- In the case of the overriding legitimate interests of the MAHLE Group (for example, to ensure network security) on Article 6 I f) GDPR.

If we are legally obliged to process your personal data, the processing takes place on the basis of Article 6 I lit. c) GDPR.

The following personal data are the subject of each processing of the MAHLE Microsoft 365 Business Standard applications:

- The business MAHLE e-mail address
- First and last name
- IP address

In addition, you have the option of voluntarily and independently entering the following personal data in your personal Microsoft MyAccount:

- Contact information
- "About me"-Description
- Projects
- Qualification and expertise
- Schools and training
- Interest and hobbies

3.1 Microsoft Outlook

Microsoft Outlook also processes the following personal data:

- Contact details such as the business phone number
- Job description or job title
- Date of birth
- Business unit, company and company location
- Personal data elements that are part of email correspondence

3.2 Microsoft Teams

Microsoft Teams also processes the following personal data:

- Job description or job title
- Business unit, company and company location
- User information: Display name ("Display name"), profile picture (optional), preferred language
- Meeting metadata: such as date, time, meeting ID, phone numbers, location
- Text, audio and video data: You may be able to use the chat function in an online meeting. In this respect, the text entries you make are processed to display them in the "online meeting". In order to enable the display of video and the playback of audio, the data from the microphone of your end device and from any video camera of the device are processed accordingly during the duration of the meeting. You can turn off or mute the camera or microphone at any time using the Microsoft Teams applications.

3.3 Microsoft Word, Excel, PowerPoint, Visio

Microsoft Word, Excel, PowerPoint, Visio also processes the following personal data:

- Contact details such as phone number
- Personal data elements that you submit as part of the creation of files

3.4 Microsoft Forms

Microsoft Forms also processes the following personal data of survey participants, unless the survey is conducted anonymously:

- Time of survey start and duration of participation
- Personal data elements that are queried in the survey and filled by the survey participant (answers)

3.5 Microsoft Whiteboard

Microsoft Whiteboard also processes the following personal data:

- Personal data elements that you submit as part of the creation of files

3.6 Microsoft Bookings

Microsoft Bookings also processes the following personal data if requested:

- Contact details, such as the phone number
- The user ID of the account in the MAHLE Active Directory
- The appointment booking

3.7 Microsoft Stream

Microsoft Stream also processes the following personal data:

- Audio and video data: In order to enable the display of video and the playback of audio, the data is processed accordingly during the duration of the meeting from the microphone of your end device and from any video camera of the end device, recorded and saved for later playback. You can turn off or mute the camera or microphone at any time using the Microsoft Teams applications.
- The user ID of the account in the MAHLE Active Directory
- The name of the creator (the person who started recording the meeting or uploaded the video file)
- Sharing the file will show the meeting participants or change it with additional people or delete some people (see version history)
- A version history is saved in OneDrive or SharePoint to show who made what change and when
- Comments

7. Data processing by affiliated companies of the MAHLE Group, third parties & processors

7.1 Data processing by Microsoft

The data processing by the MAHLE Microsoft 365 Business Standard applications takes place on servers in data centers in the European Union in Ireland and the Netherlands of Microsoft. For this purpose, we have concluded a data processing agreement with Microsoft in accordance with Article 28 GDPR. Accordingly, we have agreed extensive technical and organizational measures with Microsoft for the MAHLE Microsoft 365 Business Standard applications, which comply with the current state of the art in IT security, for example with regard to access authorization and end-to-end encryption concepts for data lines, databases and servers.

Furthermore, we have implemented the "Customer Log Box" functionality in the MAHLE Microsoft 365 Business Standard applications. This means that Microsoft has no access to our data and can request access for the purpose of remote maintenance. This access will then be checked by us in individual cases and granted upon approval. In this case, such access may also be provided by affiliated companies of Microsoft from outside the European Union. Exclusively for this case of access from outside the European Union in the case approved by us, we have concluded EU standard contracts (EU standard data protection clauses) with Microsoft. In order to guarantee an adequate level of data protection when transferring personal data to a third country such as the USA in this specific case, we have, as described above, Additional measures implemented in the form of state-of-the-art technical and organizational measures such as access authorization and encryption concepts for data lines, databases and servers.

Microsoft reserves the right to process customer data for its own legitimate business purposes. We have no influence on these data processing by Microsoft. To the extent that Microsoft processes personal data in connection with legitimate business purposes, Microsoft is an independent data controller for these data processing activities and as such is responsible for compliance with all applicable data protection regulations. If you require information about the processing by Microsoft, please consult the corresponding declaration from Microsoft.

7.2 Data processing by SoftwareONE AG, Richtstrasse 7, 8304 Wallisellen, Switzerland ("SWO")

SWO supports the MAHLE Group in the introduction of the MAHLE Microsoft 365 Business Standard applications. For this purpose, we have concluded a data processing agreement with SWO in accordance with Article 28 GDPR. Accordingly, we have agreed extensive technical and organizational measures with SWO for the MAHLE Microsoft 365 Business Standard applications, which comply with the current state of the art in IT security, for example with regard to access authorization and end-to-end encryption concepts for data lines, databases and servers.

The processing of your personal data by SWO takes place exclusively on the instruction of MAHLE International GmbH.

7.3 Data processing by affiliated companies of the MAHLE Group

MAHLE International GmbH has your personal data processed in whole or in part by other companies of the MAHLE Group. For this purpose, the MAHLE Group has concluded the MAHLE Intragroup Data Transfer Agreement. For further information on this contract, please contact Corporate Data Privacy (CY; corporate.data.privacy@mahle.com).

Except in the cases indicated separately, we only pass on your personal data to third parties if

- you have consented in accordance with Article 6 para.1 a) GDPR,

- this is required in accordance with Article 6 para.1 b) GDPR for the performance of a contract with you,
- in the event that there is a legal obligation for the disclosure pursuant to Article 6 para.1 c) GDPR; or
- this is done in accordance with Article 6. para 1 f) GDPR to safeguard the legitimate interests of the controller.

8. Transfer of personal data to a third country

Data processing outside the European Union (EU) does not take place, as we have limited our storage location to data centers in the European Union. However, we cannot rule out the possibility of routing data via Internet servers located outside the EU. This can particularly be the case if you use the MAHLE Microsoft 365 Business Standard applications, for example to communicate with people outside the EU, collaborate or share files. However, the data is encrypted during transport over the Internet and thus protected against unauthorized access by third parties.

9. Security

Through organizational and technical measures, we ensure that your data processed by us is protected against manipulation, loss, destruction and access by unauthorized persons. We always adapt our security measures to the current state of technology.

10. Deletion of your personal data

We will delete your personal data as soon as the purpose for which we collected and processed the data no longer applies. Beyond this date, storage will only take place if this is necessary in accordance with the laws, regulations or other legal provisions of the European Union or a Member State of the European Union to which we are subject.

11. Rights of the data subject

As a data subject, you have the following rights in connection with the processing of your personal data:

- Right to information pursuant to Article 15 GDPR
- Right to rectification pursuant to Article 16 GDPR
- Right to erasure pursuant to Article 17 GDPR
- Right to restriction of processing pursuant to Article 18 GDPR
- Data portability in accordance with Article 20 GDPR

If you have consented to the processing of your personal data by us, you are at any time free to revoke your consent to the processing of your personal data.

Finally, you have the right to object at any time to the processing of your personal data, or Art. 6 paragraph 1 f) GDPR (data processing on the basis of a balancing of interests) takes place to file an objection. If you object, we will only process your personal data if we can prove compelling legitimate reasons that outweigh your interests, rights and freedoms, or if the processing of the assertion, exercise or defend legal claims.

The lawfulness of the processing of your personal data until revocation is not affected by the revocation. Further processing of this data on the basis of another legal basis, for example for the fulfilment of legal obligations (see section "Legal basis of processing") shall also remain unaffected.

If you believe that the processing of your personal data violates legal requirements, you have the right to lodge a complaint with a competent data protection supervisory authority in accordance with Art. 77 GDPR.

12. Contact person

If you have any questions regarding data protection at MAHLE or wish to exercise your right of access to information or to make declarations as a data subject, please contact our company's Corporate Data Privacy (CY) department. You can reach this department by e-mail at **corporate.data.privacy@mahle.com** or use the official address of MAHLE International GmbH, Pragstraße 26-46, 70376 Stuttgart, Germany.

You can also reach our corporate data protection officer at the above address or cdpo@mahle.com.