

Privacy policy for employees and applicants

HAHN+KOLB has been a responsible employer for 125 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.

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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?

We receive personal data directly from you (e.g. during the selection and recruitment process or during the employment relationship). Your data will inevitably be present in many corporate documents and records that you create while performing your tasks and the business activities of the company. This includes manager assessments that are saved.

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. We may also collect data from third parties (e.g. employment agencies). In addition, we process personal data that we collect 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 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.

- **Application details:** 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 and emergency contact details:** Address, telephone number, mobile phone number, email address (for the purpose of communication e.g. in case of emergencies or in case of operational changes to reduce the risk of infection in the event of pandemics/epidemics)
- **Work contact details:** E.g. telephone number, mobile phone number, email address, place of work, job title and other information required for contact via 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 recording data:** Holiday periods, working hours, periods of absence, 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 further education information, data for measuring target achievement, e.g. for variable remuneration, data from personal development interviews and assessments by managers, data on violations of road traffic regulations
- **Other data in the HR department:** Working years, entry and exit date, travel expense accounting data, business travel data and data required here for visa or travel registrations, driving licence data, driving logs, access monitoring data, maternity leave details, sickness periods, inventory information, data on personnel planning and management, data on occupational integration management, event attendance data, information about permissions and authorisations, data on safety training, data from training, instruction, e-learning modules and training courses, data from occupational potential analyses (BIP), declarations of consent and approval given by you personally
- **IT-related data:** Data resulting from the use of IT systems, specifically log data, user identification (login details, user ID), assigned Wi-Fi access data, hardware and software allocated to system users, documents created and archived with the support of automated processes (e.g. email correspondence)
- **Data from online meetings, telephone and video conferences:** Depending on the type and extent of use of the conference service, the following personal data may be processed:
User information: First and last name, user name, display name, contact information (e.g. telephone number, email address), login, profile picture, preferred language
Meeting metadata: Meeting ID, IP addresses, telephone numbers, location
Text, audio and video data: Live voice and audio transmission, live motion picture, text from chat, question or survey functions, shared screen content. In the case of video conferences attended from home, live images of private premises may also be transmitted when the camera is enabled.
The camera or microphone of the device used can be switched off or muted at any time within the respective application (e.g. MS Teams or TeamViewer Meeting).
- **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 profiles of employees.
- **Suggestions for improvement:** Suggestions for improvement submitted as part of company suggestion scheme, rating of proposals and rating of awards
- **Image data:**
 - Photo and film shoots as a result of participation in events such as meetings, conferences, training sessions, seminars, corporate events, trade fairs, anniversaries, team events, customer events etc. (legitimate interest: documentation of company history and development)
 - Photos on company ID cards (legitimate interest: access control)
 - If applicable, internal publication of photos, for example in company magazines and on the Intranet (legitimate interest: information for employees, strengthening the sense of community)
 - If applicable, publication of photos for advertising purposes, e.g. on the company website, in press reports or on social media (voluntary - only on a consensual basis)
 - If applicable, personal photo, for example as an avatar for the Intranet and Outlook (voluntary on a consensual basis)

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

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 company premises such as parking lots, driveways and entrance areas: E.g. image data (appearance, behaviour), vehicle registration number, location of the image recording (space, location of the camera), time of the image recording (date, time, start/end of the image recording), role of the affected person (e.g. perpetrator, witness or victim)
- **Clothing sizes:** If applicable, clothing and/or shoe sizes (e.g. for workwear such as safety shoes, trade fair shirts, clothing for photo shoots etc.)
- **Subject data** (where the rights of the subject are being asserted in accordance with the GDPR): E.g. the category of data subject, 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 accidents at work): E.g. time of accident, description of accident history and location, health data (e.g. type and severity of injury)
- **Health data:** In certain cases, health data may also be collected, e.g. data on compliance with occupational health and safety requirements for individual employees and also for employees collectively; data on occupational health provision and health management (occupational accidents, occupational illnesses, particular allergies, occupational integration management, rehabilitation measures); data on occupational safety; degree of any serious disability; data on the disability card; data on the control of pandemics/epidemics (possible infections and symptoms, visits to risk areas after holidays or business trips, possible contacts, if applicable, data from body temperature measurements)
- **Information about relatives:** As an employer, we process information about relatives as proof for legal or company benefits (e.g. name and, if applicable, address and age of any dependants to the extent relevant for social benefits, proof of special marriage leave (marriage certificate), proof of special leave for nursing care or company respite grant for the care of relatives (certificate of need for care))

4. Purpose and legal basis for processing

Your personal data is processed in accordance with the provisions of the European General Data Protection Regulation (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.

4.1. Based on your consent

according to Article 6(1)(a) GDPR in conjunction with Paragraph 26(2) 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 occupational health management
(e.g. implementation of measures arising from occupational integration management (BEM) or carrying out body temperature measurements for entry control in the case of pandemics/epidemics)
- For the purpose of occupational potential promotion
(e.g. implementation of occupational potential analyses (BIP))
- For the purpose of promoting the company externally
(e.g. image data on the company website, in press reports, in social media and print products)

- For the purpose of voluntary questionnaires and surveys
- In internal IT-supported communication systems
(e.g. portrait pictures as an avatar in internal communication platforms or email clients)

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.

4.2. For the fulfilment of contractual obligations

according to Article 6(1)(b) GDPR

The processing of your personal data takes place primarily in the context of employment, i.e. we process your data for the purpose of establishing, carrying out and terminating the employment or training contract concluded with you:

- For the implementation of the application and orientation process
- For payroll, salary, travel expenses and pension payments (including the calculation and settlement of social security contributions)
- For time recording and time management (e.g. management of working hours and absences due to holidays, sickness, maternity, work accidents)
- For the processing of remuneration and benefits (e.g. personnel discount, occupational pension, public transport cards, canteen allowance, bonus calculation)
- For company car management (including driving licence checks among other things)
- For the organisation and implementation of business trips, including billing of company credit card use, reimbursement of travel expenses, visa procurement, application for A1 certificate

Part of our company culture is maintaining birthday lists in order for your manager to congratulate you on your birthday as a sign of appreciation. This also takes place for the implementation of your employment relationship.

In addition, collective agreements (group, general and local company agreements as well as collective agreements) according to Article 88(1) GDPR in conjunction with Paragraph 26(4) BDSG, latest version, can be used as legal permission in terms of data protection (e.g. company agreement for the company suggestion scheme).

For orders from our product range for private use, your data will be processed to fulfil contractual obligations. Please also note the general privacy policy on our website

► www.hahn-kolb.net/Data-protection-declaration

4.3. Due to legal requirements

according to Article 6(1)(c) 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 Paragraph 257 of the German Commercial Code (HGB), Paragraph 147 of the German Tax Code (AO), Paragraph 41 section 1 of the German Income Tax Act (EStG)
- For the processing of income tax data according to Paragraph 39 section 8 and 9 of the German Income Tax Act (EStG)
- For maintaining working time accounts in accordance with Paragraph 7d section 1 line 1 of the German Social Security Code (SGB IV)
- For the documentation of overtime in accordance with Paragraph 16 section 2 of the German Working Time Directive (ArbZG)
- For compliance with the duty of care towards individual employees and towards employees as a whole (to protect against threats to life and health) in accordance with Paragraph 618 BGB and Paragraph 3 of the German Occupational Safety Directive (ArbSchG)

- For compliance with quarantine regulations and bans on activities in accordance with Paragraphs 30, 31 and Paragraph 16 section 1 and section 2 of the Infection Control Act (IfsG)
- For risk assessment in accordance with Paragraph 5 of the German Occupational Safety Directive (ArbSchG)
- For occupational health purposes in accordance with Paragraph 11 of the ArbSchG
- For the implementation of measures arising from company integration management (BEM) according to Paragraph 167 section 2 of the SGB IX. Additional declarations of consent shall be obtained from the employees concerned as not all data processing required for BEM can be supported by the aforementioned legal basis.
- For health and safety training in accordance with Paragraph 12 section 1 line 1 of the ArbSchG
- For recording obligations in accordance with Paragraph 17 of the German Minimum Wage Law (MiLoG)
- For documentation of residence permits in accordance with Paragraph 18 of the Residence Act (AufenthG)
- For processing data for the purpose of obtaining visas (according to the respective laws of the destination countries)
- For processing data for the purpose of applying for an A1 certificate for travel to other EU countries in accordance with Regulation (EC) no. 883/2004 and 987/2009
- For the implementation and documentation of legally necessary legal, technical or economic tests (e.g. audits, reliability tests according to the Money Laundering Act (GwG) etc.)
- For accountability in data protection in accordance with Article 5 and 24 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

4.4. To safeguard the legitimate interests of HAHN+KOLB according to Article 6(1)(f) GDPR

We process your data to protect our legitimate interests or those of third parties for various purposes, such as:

- For personnel planning, administration, development, management and care, as well as staff accounting (e.g. management of personnel files, training, staff development meetings, personnel and performance assessments)
- For avoiding unnecessary expenses and increasing efficiency and effectiveness (e.g. budgeting, finance management, reporting, continuous improvement process)
- For general business management and further development of services, service provision, product range and to ensure business continuity (e.g. by qualifying employees and thereby increasing satisfaction)
- For customer advice and support as well as sales (e.g. forwarding names and contact details to suppliers for optimised customer service)
- For internal and external communication and smooth business processes (e.g. for providing address books and for publishing your professional contact information on the Intranet)
- For organisation and implementation of internal and external events (e.g. name tags, participant lists and confirmation of participation in seminars, compulsory training courses, company celebrations, department trips, congresses, trade fairs)
- For documentation of company history and development (e.g. creation of photo and video recordings for permanent archival as a result of participation in events such as meetings, conferences, training sessions, seminars, corporate events, trade fairs, anniversaries, team events, customer events etc.)
- For informing employees and strengthening the sense of community (e.g. internal publication of photos and films in company magazines and on the Intranet)

- For external representation and image enhancement through marketing and public relations (e.g. standard trade fair clothing, company magazine, advertising materials, catalogues, direct marketing. Publication of photo and film recordings with a very large number of people or with people who are not regarded as the main subject of the pictures. Publication of contact information on the Internet if employees are to act as direct contacts.)
- For provision and use of IT systems and IT-supported communication systems (e.g. licence management, contact data maintenance, scheduling, communication data for telephony, email, chat, online meetings, video conferencing or other modern communication technologies)
- For taking an inventory of the IT systems and software provided
- For ensuring IT security (including entry, access and input control) and IT operations (e.g. management of network and application access rights using individual user IDs and passwords)
- For ensuring compliance with security regulations, requirements, industry standards and contractual obligations
- For protecting 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)
- For quickly contacting family members, e.g. in case of accidents at work (emergency contacts)
- For avoiding other regulatory requirements such as the need to keep a driver's logbook
- For avoiding 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 races or football tournaments). Participation in such events and disclosure of any personal data is always voluntary.

4.5. To detect criminal offences

according to Paragraph 26(1)(2) BDSG, latest 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.

4.6. Further information about special categories of personal data:

Where special categories of personal data according to Article 9(1) GDPR are processed, this takes place as part of the employment relationship for the purpose of exercising rights or meeting legal obligations under labour law (e.g. for compliance with the company's duty of care toward employees - see also point 4.3), 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 Article 9(2)(b) GDPR in conjunction with Paragraph 26(3) BDSG, latest version. In addition, it may be necessary to process health data to assess your ability to work in accordance with Article 9(2)(h) in conjunction with Paragraph 22(1)(b) BDSG, latest version. Or it can be legally prescribed e.g. for the containment of pandemics/epidemics.

In addition, the processing of special categories of personal data may be subject to consent according to Article 9(2)(a) GDPR in conjunction with Paragraph 26(2) BDSG, latest version (e.g. occupational health management).

5. Who receives your personal data?

In order to process your data for an intended purpose, it may be necessary in individual cases to transmit relevant data to other companies within the HAHN+KOLB Group or to third parties, potentially those outside the EU/EEA. If we disclose data to other persons and companies (data processors, jointly responsible persons or third parties) within the scope of our data processing, transfer it to them or otherwise grant them access to the data, this is only done on the basis of a legal permission (e.g. if a transfer of the data to third parties, such as payment service providers, is necessary for the fulfilment of the contract), users have consented to it, a legal obligation provides for it or on the basis of our legitimate interests (e.g. when using commissioned web hosts etc.). The recipients may be:

5.1. Internal

Within our company, only employees, managers, departments or works council members who need to process your data for the above-mentioned purposes and who are authorised to process this data will have access to your data.

5.2. Within the WÜRTH Group

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 handling of occupational pensions, recruiting platform, fleet management, cloud services, planning and implementation of events and business travel, hospitality at the staff canteen). If we disclose, transmit or otherwise grant access to other companies within our group of companies, this is done in particular on the basis of a group-wide data transfer agreement according to Article 26 and 28 GDPR.

5.3. External

Outside of our company and the WÜRTH Group, regular recipients of your data are, for example:

- Business partners (work contact details to customers, suppliers, service providers, interested persons, consultants or experts)
- Travel agencies, hotels, airlines and billing services (for business travel)
- Vocational schools, universities and other education and training providers, external trainers and lecturers, online presentation providers, conference hotels, event partners, caterers (e.g. for training sessions, e-learning, seminars, conferences and events)
- Job centres and recruitment agencies
- Tax consulting firms, law firms and auditing firms
- Payroll banks, corporate credit card companies and sponsors
- Company doctors, external safety specialists and occupational health and safety service providers for the provision of services under the occupational health and safety laws
- Car dealerships and car leasing companies within the scope of company car orders, financing, issue and return as well as service appointments
- Classification societies and certification and auditing bodies
- Health insurance companies, occupational pension providers, health, social and accident insurers as well as other insurance companies (e.g. for capital-forming payments)
- Company ticket providers for the management of company tickets in local public transport
- Mail and courier services

5.4. Data processors

Beyond this, data processors engaged by us may receive data according to Article 28 GDPR. These data processors are contractually bound by us to maintain corporate secrecy and to comply with the stipulations of the GDPR and the BDSG in its latest version. Data processors may be third parties or other companies within the WÜRTH Group.

These are service providers in the following areas:

- IT services (e.g. data centres, providers of online meeting tools)
- External project service providers
- Logistics, external service providers involved in processes
- Record and data destruction companies
- Printing companies and marketing and advertising agencies
- Plant protection/reception/general administration

5.5. Public bodies and institutions

In certain cases, we also provide data to public bodies and institutions (e.g. supervisory authorities, financial authorities, social insurers, courts, employment agencies, registrars, 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. As part of the containment of pandemics/epidemics, recipients can also be regulatory and health authorities.

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

Data is transmitted to third countries (countries outside the European Economic Area - EEA) as we work with internationally active business partners. The transfer of personal data to third countries may also be necessary in the case of employee dispatches and for the organisation and handling of travel abroad. This applies in particular to hotel reservations, flight bookings, rental vehicles, visas etc.

If it is necessary in individual cases to transmit the relevant data to recipient bodies outside of the EU/EEA in order to fulfil the purpose, the appropriate level of protection usually comes from the presence of an adequacy decision by the European Commission, the use of inter-company or external agreements based on EU standard data protection clauses (according to Article 46(2)(c) and (d) GDPR) or the presence of an exception provided by the GDPR for the specific case (according to Article 49(1) GDPR, e.g. the transmission 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 for 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, for example, 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 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 in accordance with sec. 195 BGB of 3 or up to 30 years).

Photographs and film recordings for the documentation of the company's history and development are stored for permanent archiving for an indefinite period.

Provided we receive your 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 company magazine).

8. Automated individual decisions

In certain areas, we use automated procedures for decision-making. However, fully automated decision-making (including profiling) according to Article 22 GDPR does not take place. 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 applicant portal, though it can also be obtained in the course of the application and recruitment process

(e.g. through an assessment centre) or from publicly accessible sources (e.g. from 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 or trade union membership, and do not send us any health data (e.g. illnesses, social security number).

When accessing our applicant portal, we also process usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, details of times, identification numbers, consent status); content data (e.g. entries in online forms). For further information, please refer to our general privacy policy on our website:

► www.hahn-kolb.net/Data-protection-declaration

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 are not obliged 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 and to make a decision regarding the establishment of an employment relationship according to Article 6(1)(b) GDPR. If you also provide us with special categories of personal data (sensitive data), we process this on the basis of your explicit consent (Article 9(2)(a) 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 according to Article 6(1)(f) 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 establishment of an employment relationship, it will be deleted after the expiry of a period of six months following the announcement of the decision not to establish the relationship, so that we can answer any follow-up questions to the application and comply with our obligations to provide proof under the General Act on Equal Treatment (AGG). This deletion shall take place provided that no other legitimate interests of HAHN+KOLB or legal retention periods stand in the way of deletion. 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).

Applicants' data will also be deleted if an application is withdrawn, which applicants are entitled to do at any time.

9.4. Consideration for future vacancies

If the applicant's profile is also considered for future vacancies, this will only occur with the applicant's consent. In this case, the legal basis for further storage and processing of the applicant data is Article 6(1)(a) GDPR. The application documents will be processed solely in the context of future job advertisements and personnel searches and will be deleted at the latest when the agreed deadline has expired. The applicants are informed that their consent is voluntary,

has no influence on the current application procedure and that they may revoke this consent at any time for the future as well as lodge an objection within the meaning of Article 21 GDPR.

9.5. 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.

If necessary for the fulfilment of 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. If the legal requirements are met, you are entitled to information, rectification, deletion, restriction, data portability and 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 being infringed for any other 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** (according to Article 15 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** (according to Article 16 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"** (according to Article 17 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** (according to Article 18 GDPR and Paragraph 35 BDSG, 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 according to Article 21(1) GDPR. Processing will be restricted until it is determined whether the legitimate interests of HAHN+KOLB are sufficient
- **Right to data portability** (according to Article 20 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** (according to Article 21 GDPR):
You have the right, at any time and for reasons relating to your own particular situation, to lodge an objection to the processing of your personal data, based on legitimate interest; this also applies to profiling based on these provisions.
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.
- **Right to lodge a complaint with the supervisory authority**
(according to Article 13(2)(d) and Article 77 GDPR in conjunction with Paragraph 19 BDSG, 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** (according to Article 7(3) GDPR in conjunction with Paragraph 26(2) BDSG, 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 a 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.

11.1. Modification of this privacy policy

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, continuous further development of procedures and data processing methods and to meet new legal requirements. We therefore recommend that you check the privacy policy at regular intervals for the latest version.