

Data protection information for applicants and employees (m/f/d)

Version 3 dated June 14th 2023

Hello,

At the dormakaba Group we take the protection of your personal data very seriously and will always process your personal data in compliance with the legal data protection regulations. In the following, terms such as "applicant", "employee", etc. will be used in a gender-neutral manner.

Regardless of whether you are an applicant or an employee, we want to provide you with an overview of how we process your personal data and information regarding what your rights are according to provisions of article 13, 14 and 21 of European General Data Protection Regulation (GDPR). The term "employee" also includes interns, diploma students, student trainees, seasonal workers, and temporary employees.

A. Responsible authority and data protection officer

a. Responsible for the processing of your personal data is the

dormakaba International Holding GmbH
DORMA Platz 1
58256 Ennepetal
Germany
Phone: +49 2333 793 0
Mail: info.de@dormakaba.com

b. You can reach out Data Protection Officer via

dormakaba International Holding GmbH
attn. Data Protection Officer
DORMA Platz 1
58256 Ennepetal
Germany
Mail: data.protection@dormakaba.com

The responsibility for the data processing of your personal data changes, depending on a possible employment with a dormakaba company other than above. Detailed information can be found in annex "Responsible persons and data protection officers". Please find the responsible Data Protection Officer in annex "Responsible persons and data protection officers" as well.

B. How do we collect your personal data?

We process personal data, which we receive from you when you contact us.

With regards to applicants, this takes place during a job application, when a recruitment service provider provides us with your contact details or application documents, or if you apply directly to us via e-mail. Even if you hand your application to us in person, data collection still takes place.

After collection, this personal data is processed further as described below in the course of the employment relationship.

We also process personal data retrieved with your consent from publicly accessible sources (e.g. social networks such as monster.com, Facebook, LinkedIn or XING), or that is transferred to us with your consent from other companies in the dormakaba Group or other third parties.

Personal data required for the purposes of your employment at a German dormakaba entity include for example:

- Personal identification (passport photo for company ID) and contact information (e.g. title, name, address, date of birth, religious denomination, nationality, sex, marital status, whether you have children, e-mail address, telephone and mobile number);
- Payment details (e.g. your IBAN and BIC);
- Information about your work or residence permit;
- Data about your personal qualifications, e.g. school leaving certificate, vocational qualifications, language skills, certifications;
- CV (former employers and roles);
- Health insurance status, VAT ID number, tax information;
- Former work references;
- Insurance (e.g. direct insurance, occupational pension schemes, insolvency insurance, etc.);
- If applicable: Disability status; maternity and parental leave; phased retirement, DEÜV information, employers' liability insurance association classification;
- Organizational allocation, supervisor, cost center, working hours model;
- Pay (basic pay, recurring payments and deductions, one-off payments, occupational and survivor's pensions); seizures; company car (non-cash benefits, own shares);
- If applicable: Enrolment or internship certificate;
- If applicable: Powers of attorney, assignments, secondary employment;
- Assessments (probationary period assessment, performance assessment, etc.), cautions, warnings;
- If applicable: Work and commuting accidents;
- Entry date; transfer and departure date; reason for departure;
- Clock-in and clock-out bookings, holiday, special holidays, time balance, notice periods;
- If applicable, your car registration plate.
- Travel information for purposes of travel expense accounting

If you are employed on the basis of a temporary contract, this data has already been received and will be transferred to the respective dormakaba entity in Germany by the hirer for the purpose of the initiation or fulfilment of the contract.

C. Purpose and legal basis of data processing

We process your personal data in accordance with EU-GDPR and for the purpose of establishing, fulfilling, and terminating your employment relationship according to Art. 88 EU-GDPR in conjunction with Art. 26 BDSG-Neu (New German Federal Data Protection Law as well as eventually Art. 6 (1) EU-GDPR).

1. Performance of contractual measures (Art. 6 (1) (b) GDPR)

Processing of data is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract.

2. Compliance with a legal obligation (Art. 6 (1) (c) GDPR)

Furthermore, personal data can be processed if processing is necessary for compliance with a legal obligation or defense and assertion of legal claims from the responsibility relationship. Legal basis is here Art. 6 (1) (f) EU-GDPR. Justified interest for example could be burden of proof in legal proceedings according to the German General Equal Treatment Act (AGG).

3. Consent (Art. 6 (1) (a) GDPR)

If you give your consent to processing your personal data for designated purposes, the legality of such processing is given according to Art. 6 (1) (a) EU-GDPR. Given consent can be revoked with future effect any time (see chapter one of this data protection information).

4. Establishing, fulfilling, and terminating the contract (§ 26 I S1 BDSG-Neu)

Initially, the purpose of processing the data is to select suitable candidates. As early as the contract initiation stage, we are legally obliged to subject your data to an "anti-terror screening".

If we enter into an employment contract with you, the storage and usage of your personal data is required in order to uphold our obligations, i.e. the payment of your salary or provision of other salary components, such as company cars and other services.

We also require your data in order to be able to train you as an employee, and to develop tailored training activities and career opportunities together with you.

If we do not enter into an employment contract with you, further processing is required in the event of any claims arising from the German General Equal Treatment Act (AGG).

The Human Resources department will create a personnel file for the management of your personal details. This contains both your applicant details, and any documents and contract amendments resulting from your ongoing employment with dormakaba.

Depending on your individual role, it is possible that a reliability or security check of your background is required before we can assign you to certain customers or areas (e.g. aviation security).

Within the course of human resources development activities (workshops, team training, coaching, management training, individual development measures), personal data is regularly processed in accordance with the objective, purpose and progress of the activity. Generally, this includes the name of the participants, their professional contact details, and the results of workshops or individual activities.

If you are contractually entitled to a company car, we are legally obliged to carry out regular checks that you are in possession of a valid driver's license.

Operating data is collected in all our factory buildings for the purpose of process optimization and identification of training requirements, including working hours.

5. For the investigation of criminal offences (§ 26 I S2 BDSG-Neu)

We reserve the right to process personal data of employees for the purpose of investigating criminal offences according to § 26 I S2 BDSG-Neu. This requires clear, documentable indications to support the suspicion that the person concerned has committed a criminal offence within the scope of their employment relationship and that the processing of this data is necessary for the investigation and has undergone a balancing of interests.

D. Recipients of personal data

Within our company, your data can be accessed by those individuals or offices who require them to perform their respective role in the company, or to fulfill our contractual or legal obligations.

- The works council or alternatively the representative body for executive staff, eventually the representative for severely disabled persons will receive any necessary data within the scope of its legal duties and rights according to the Works Constitution Act (BetrVG).
- Your personal data can be passed to companies associated with the dormakaba Group as far as this is in accordance with the purposes and legal bases stated in chapter C of this data protection information.
- Human resources development information will be shared between the Human Resources department and the accompanying trainers, coaches, or other human resources development service providers. These service providers are contractually bound to a non-disclosure agreement and an order processing contract and are also obligated to comply with the legal data protection regulations on their part.
- Under certain conditions, personal data may also be transferred to public institutions (e.g. tax authorities, job centers, integration offices), social insurance agencies, judicial and law enforcement authorities (e.g. police, prosecution offices, courts), lawyers and notaries, as well as accountants.
- We will also transfer your data to a travel agency for the purpose of organizing your business trip.
- If you are contractually entitled to a company car, the lessor will receive your contact details.
- Internal Audit will receive the data for examination purposes.
- dormakaba employees when there will be an announcement due to your entry (the announcement will be posted in reconciliation with you)

Specifically, the following recipients may receive your personal data:

- Trade associations;
- Financial authorities;

- Social insurance agencies, e.g. health insurance providers, pension insurance companies, etc.;
- Aviation security authority;
- Integration office;
- Insurance companies;
- Accountants;
- Social security and tax auditors;
- ISO auditors;
- Authorities (within the scope of assignments);
- Chamber of industry and commerce, universities, training workshop (in the case of apprentices);
- Centre for Occupational Healthcare and Work Safety (ZAA);
- Leasing companies

E. Transfers to third countries or international organizations

As a rule, we only transfer your personal data to recipients within the European Economic Area as well as Switzerland. Expatriations to non-European countries are an exception. If your personal data is transmitted to third countries outside the European Economic Area, which might not provide an appropriate data protection level, we will take all necessary measures for such data transmissions according to EU-GDPR. We use adequate technical and organizational measures (TOMs) to protect your personal data from unauthorized access or usage as well as unintentional, accidental loss or destruction.

F. Duration of storage

We will always delete your personal data, once the purpose of processing has expired, all mutual obligations have been fulfilled and no other legal obligations or justifications for the storage of your data exist to the contrary.

Data are stored according to the principle of storage limitation. This means that data are only stored for as long as it is necessary for the respective purpose. Legal deletion and retention periods are also taken into account in accordance with the country regulations. Please refer to annex C for the country specific retention periods.

G. Your data protection rights

You have the following rights to data protection in accordance with the legal provisions:

1. the right to information about the personal data stored by the respective dormakaba entity (article 15 EU-GDPR) as well as

2. the right to rectification of your data (article 16 EU-GDPR),
3. the right to deletion of your data (article 17 EU-GDPR),
4. the right to restrict the processing of your data (article 18 EU-GDPR),
5. the right to the portability of your data (article 20 EU-GDPR),
6. and the right to object (article 21 EU-GDPR)

In addition, you have the right to address an inquiry or complaint to the responsible supervisory authority. For North Rhine-Westphalia, for example, this would be the responsibility of the Representative for Data Protection and Freedom of Information for North Rhine-Westphalia (LDI NRW) (<https://www.ldi.nrw.de>).

H. Am I required to provide you with my personal data?

As part of the employment relationship, you must provide the personal data that is required for the initiation, fulfillment and termination of the employment relationship and for the fulfillment of the associated contractual obligations, or that we are legally obliged to process. Without this data, we are generally unable to enter into or fulfill an employment contract with you.

In our contract forms and on our website, it is clearly marked which information is voluntary and which is compulsory.

I. Right of objection

1. The right of objection in individual cases

You have the right to object to the processing of your personal data at any time, for reasons arising from your particular personal situation, if processing takes place on the legal basis outlined in article 6 para. 1 point e EU-GDPR (processing in the public interest) and art. 6 para. 1 point f EU-GDPR (data processing for the purpose of balancing of interests). This also applies to profiling that is supported by this condition.

If you file an objection, we will refrain from processing your personal data, unless we can demonstrate mandatory, legitimate reasons for processing such data that outweigh your interests, rights and freedoms, or serve the purpose of enforcing, exercising or defending legal claims.

2. Recipient of your objection

You can send your objection in any format with the subject line "Objection", stating your name, address and date of birth, to us (see annex).

J. Video conferences, online meetings, webinars and screen sharing

We use platforms and applications of other providers (hereinafter referred to as "Third-Party Providers") for the purpose of conducting video and audio conferences, webinars and other types of video and audio meetings. When selecting third-party providers and their services, we comply with any associated legal requirements. See annex B for an overview of used providers.

In this context, any communications facilitated on the platform of a third-party provider will have participant data processed by and stored on the servers of those third-party providers. This data can in particular include registration and contact data, visual and vocal contributions, as well as entries in chats and shared screen contents.

If dormakaba invites a user to use a third-party provider, utilizing that platform or software to facilitate business operations, communication, or other forms of a relationship between the user and dormakaba, that third-party provider will have the ability to process the data and metadata used in that exchange for security, service optimization, or marketing purposes. We therefore ask that users review the data protection information of the third-party providers being utilized.

Notes on the legal basis: If we ask users for their consent to use the third-party providers or certain functions (e.g. consent to a recording of conversations), the legal basis for processing is the consent. Furthermore, their use can be a component of our (pre)contractual services, insofar as the use of third-party providers has been agreed in this context. Otherwise, user data is processed on the basis of our legitimate interest in efficient and secure communication with our communication partners. In this context, users may refer to the following information on the use of cookies in this privacy policy.

- **Processed Types of Data:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text entries, photographs, videos), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Persons concerned:** communication partners, users (e.g. website visitors, users of online services).
- **Purposes of processing:** contractual services and support, contact requests and communication, office and organizational procedures.
- **Legal bases:** Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), contract performance and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO)

The above written data privacy statement is valid for all below listed legal entities. For some countries additional information is available. Please follow [this link](#) for additional local information. For the United Kingdom and Ireland, deviating Data Privacy Statements are in place. Please follow [this link](#) to access the United Kingdom Data Privacy Statement and [this link](#) to access the Ireland Data Privacy Statement.

Thank you for taking the time to read our data protection information for applicants and employees.

Annex:

Annex A: Responsible persons and data protection officers

Aluminum Services, Inc
480 South Main Street
Randolph, MA 02368
data.protection@dormakaba.com

Alvarado Inc.
12660 Colony Ct.
Chino, CA 91710

data.protection@dormakaba.com

dormakaba Access Solutions LLC
Al Emadi Business Centre Doha, Qatar
PO Box 40619

data.protection@dormakaba.com

Dorma Arabia Automatic Doors Co. LTD
Sultan Bin Abdel Aziz Road
Al Olaya, Riyadh 12331

data.protection@dormakaba.com

dormakaba Austria GmbH
Urbanek Lind Schmied Reisch Rechtsanwälte OG
Domgasse 2
3100 St. Pölten

dsgvo.at@dormakaba.com

dormakaba Bulgaria EOOD
r.d. Druzhiba 2, Heidelberg 15 Str.
Sofia, 1582

personaldata.BG@dormakaba.com

dormakaba business services Bulgaria EOOD
bul. Tsarigradsko shose 90, Capital fort, vh B, et 5,
Sofia, 1582

personaldata.BG@dormakaba.com

dormakaba Canada Inc.
7301 Decarie Blvd,
Montreal, QC H4P 2G7
data.protection@dormakaba.com

dormakaba Deutschland GmbH
attn. Data Protection Officer
DORMA Platz 1
58256 Ennepetal
norbert.hermkes@dormakaba.com

dormakaba España S.A.U

Maria Tubau, 4
28050 Madrid
protecciondedatos@dormakaba.com

dormakaba France

attn. Délégué à la Protection des Données
3 rue Descartes
78320 Le Mesnil Saint-Denis
data.protection.fr@dormakaba.com

dormakaba Holding GmbH + Co. KGaA

attn. Data Protection Officer
DORMA Platz 1
58256 Ennepetal
data.protection@dormakaba.com

DORMA-Glas GmbH

attn. Data Protection Officer
Max-Planck-Str. 33-45
32107 Bad Salzuflen
claus.frohwitter@dormakaba.com

DORMA Hüppe Raumtrennsysteme GmbH + Co. KG

Industriestraße 5
26655 Westerstede / Ocholt

dormakaba International Holding AG

attn. Data Protection Officer
Hofwissenstrasse 24
8153 Rümlang
data.protection@dormakaba.com

External attn. Data Protection Officer: MERENTIS DataSec GmbH

Fachbereich Datenschutz
Rechtsanwalt Tobias K. Eicke
Kurfürstenallee 130
28211 Bremen
teicke@merentis.com

dormakaba EAD GmbH

attn. Data Protection Officer
Albertstraße 1
78056 Villingen-Schwenningen
data.protection.vs.de@dormakaba.com

dormakaba Gulf FZE
Plot No. S20135 P.O.Box: 17268 Jebel Ali.
Dubai United Arab Emirates Zone: Jebel Ali Free Zone
data.protection@dormakaba.com

dormakaba Kuwait Ready Made Doors and Windows Co.
Block-1 Street-12 Building B-71 Office No#11
Shuwaikh Industrial Area P.O. Box 42294
data.protection@dormakaba.com

dormakaba Norge AS
Graterudveien 16
3036 Drammen
anders.birkeland@dormakaba.com

dormakaba Middle East LLC
Al Qusais' Industrial area 1
Warehouse no 242-162 P.O. Box 121732
data.protection@dormakaba.com

dormakaba Schweiz AG
attn. Data Protection Officer
Mühlebühlstrasse 23, Kempten
8623 Wetzikon ZH
data.protection@dormakaba.com

dormakaba Singapore Pte Ltd
12 Tukang Innovation Drive #04-01
Singapore 618303
data.protection@dormakaba.com

dormakaba South Africa (Pty) Ltd
2 Gravel Drive, Kya Sands Business Park, Kya Sands

2169 Johannesburg
data.protection@dormakaba.com

dormakaba Sverige AB
FO Petersons gata 28
421 31 Vastra Frolanda
anders.birkeland@dormakaba.com

dormakaba USA Inc.
attn. Data Protection Officer
Dorma Drive,
Reamstown, PA 17567
data.protection@dormakaba.com

Farpointe Data Inc.
attn. Data Protection Officer
2195 Zanker Road
San Jose, CA 95131
data.protection@dormakaba.com

Kaba Ilco Corp.
attn. Data Protection Officer
400 Jeffreys Rd.
Rocky Mount, NC 27804
data.protection@dormakaba.com

Kaba Mas LLC
attn. Data Protection Officer
749 W Short St
Lexington, KY 40508
data.protection@dormakaba.com

Kaba Workforce Solutions, LLC
attn. Data Protection Officer
749 W Short St
Lexington, KY 40508
data.protection@dormakaba.com

LEGIC Identsystems AG

Binzackerstrasse 41
8620 Wetzikon
data.protection@dormakaba.com

Modernfold Inc.
attn. Data Protection Officer
Greenfield, Indiana (Headquarters)
215 W New Road
Greenfield, IN 46140
data.protection@dormakaba.com

Modernfold Inc.
attn. Data Protection Officer
Dyersville, Iowa (Manufacturing facility)
512 5th Street NW
Dyersville, IA 52040
data.protection@dormakaba.com

Skyfold Inc.
325 Avenue Lee
Montréal
H9X 3S3
data.protection@dormakaba.com

Smart Access Solutions Co. Ltd
Prince Mohammad Bin Abdul Aziz Street,
Al Jawharah Building, Riyadh
data.protection@dormakaba.com

dormakaba Pacific
12-13 Dansu Court
Hallam, VIC
Australia 3803
data.protection@dormakaba.com

dormakaba Malaysia Sdn Bhd
3, Jalan TP 6
Taman Perindustrian UEP
47600 Subang Jaya Selangor Darul Ehsan Malaysia
data.protection@dormakaba.com

Annex B: Used services and service providers

Microsoft Teams and Skype:

Messenger and conferencing software; service providers: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA;

Website Skype:<https://www.skype.com/de/>;

Website Teams:<https://www.microsoft.com/de-de/microsoft-365/microsoft-teams/group-chat-software/>

Privacy policy:<https://privacy.microsoft.com/de-de/privacystatement>, safety instructions:<https://www.microsoft.com/de-de/trustcenter>.

Annex C: Data retention periods

Country	Candidate Profile	Job Application
Austria	6 Months	6 Months
Australia	6 Months	6 Months
Bulgaria	6 Months	6 Months
Canada	3 Years	3 Years
Denmark	12 Months	12 Months
Finland	12 Months	12 Months
France	2 Years	2 Years
Germany	6 Months	6 Months
Kuwait	5 Years	5 Years
Malaysia	2 Years	2 Years
New Zealand	6 Months	6 Months
Norway	12 Months	12 Months
Qatar	5 Years	5 Years
Saudi Arabia	5 Years	5 Years
Singapore	2 Years	2 Years
Spain	12 Months	12 Months
Switzerland	2 Years	2 Years
Sweden	12 Months	12 Months
UAE	5 Years	5 Years
USA	4 Years	4 Years
Remaining Countries	6 Months	6 Months