

Privacy Notice for ams OSRAM Employees

This **Privacy Notice** describes how your personal data as employee, former employee or applicant of an **ams OSRAM company** (“ams OSRAM”) is processed. It describes how ams OSRAM uses your personal data, what measures are taken to protect your data and the rights you have concerning your personal data.

Introduction

The protection of personal data is a major concern for ams OSRAM. Therefore, ams OSRAM processes your personal data only in accordance with the provisions of the EU General Data Protection Regulation and other applicable legal requirements on the protection of personal data and data security.

A. The purpose of processing, data categories and the legal basis of the processing

ams OSRAM processes your personal data in order to fulfill and manage your existing, finished or future employment relationship. In this context, inter alia the following processing activities are executed:

- Recruiting and staffing, such as: conducting job interviews and selecting suitable persons;
- Management of salary payment, such as: payroll accounting;
- Personnel and organizational management, such as: administration and maintenance of the personnel file, performance assessments;
- Transfer and disclosure of information in the context of your professional activity, including inter alia towards other ams OSRAM group entities or business partners, ams OSRAM customers, interested parties and, where relevant, Internet users on corporate social media accounts (Facebook, LinkedIn, TikTok, etc.);
- Protection of the company’s assets, such as: appropriate access restrictions to the worksites and facilities;
- Compliance with legal obligations, such as: billing, accounting and auditing requirements, regular background checks for certain groups of employees based on their functions and position level (if legally required).
- Prevention, detection and investigation of compliance violations as well as subsequent damage control and mitigation, such as: preventive measures (e.g., trainings),

compliance controls and risk assessments, examination of incoming whistleblower reports and, if necessary, carrying out compliance investigations;

- Assignments (only affects employees who are delegated during their employment relationship) such as: application for a work permit to government and regulatory agencies;
- Detection of suspicious behaviour to prevent attackers from analysing or spreading through our network (preventive IT Security measures).

For the purposes named above, ams OSRAM processes personal data that you have provided yourself or which are collected in connection with your employment. These are the following data categories:

- Contact information;
- Application details;
- Payroll data;
- Employee identification numbers (e.g., tax identification number);
- Nature of the employment (e.g., temporary, full-time, party-time);
- Information regarding presence and absence;
- Information regarding employee assessment and training activities;
- Information regarding the health status (e.g., payment of sick benefits);
- Information on potential conflicts of interests, as reported by involved individuals or third parties;
- Where appropriate and to the extent permitted under applicable law, information on white-collar crime records necessary to assess on a regular basis reliability of employees in sensitive functions (e.g., Finance, Sales, Procurement) for money-laundering risks, so called “anti-money laundering employee background checks”;
- Where appropriate and to the extent permitted under applicable law, information necessary to detect and investigate compliance violations (e.g., e-discovery, that is, the process of identifying and delivering electronic information that can be used as evidence in the course of compliance internal investigations);
- Where relevant,
 - information regarding assigned assets (e.g., leased company vehicles);
 - information regarding the organization and implementation of business trips.

Processing for the purposes described above does not, as a rule, involve operations with sensitive personal information of any kind (“special categories of personal data”). Otherwise, stricter rules of handling of such personal information will apply.

ams OSRAM processes your personal data on the basis of the following legal grounds:

- for the performance of the employment contract;
- to fulfill legal obligations, or
- for the protection of legitimate interests of ams OSRAM (as the party to employment agreement) under consideration of the rights and interests of the employees;
- if you have explicitly declared your consent to the processing of your personal data in an individual case, this consent will be the legal basis for the agreement);
- based on work council agreements for specific cases.

B. Disclosure and transfer of personal data

ams OSRAM may transfer your personal data within the scope of a legitimate interest to:

- other group companies, in particular the group headquarters – ams-OSRAM AG;
- other recipients, such as tax- and legal advisors, courts, providers of insurance and pension benefits or business partners for whom the employee is involved in projects;
- IT-providers;
- in case of involvement of required service providers to any such service provider.

In case of a commissioned data processing by one of the service providers on behalf of ams OSRAM, appropriate contractual obligations are envisaged and duly implemented in accordance with the requirements of Art. 28 EU General Data Protection Regulation.

If data recipients are located in countries outside of the EU/EEA without adequate level of data protection, ams OSRAM undertakes measures to ensure appropriate and adequate guarantees for the protection of personal data in accordance with applicable legal requirements. If the data is transferred:

- to group companies in such countries, it will be ensured that these companies have signed and adhere to the binding company policy for the safety of the personal data (Binding Corporate Rules “BCR”). More information regarding the ams OSRAM BCR can be found on the Intranet or in our general Privacy Policy.
- to external recipients in such countries, the data will only be transferred, if they have signed the EU standard contractual clauses with ams OSRAM.

C. Retention periods

If the explicit storage period was not specified prior to the collection, your personal data will be deleted, (i) if it is not necessary anymore to meet the purpose of storage and (ii) there are no legal obligations (e.g., trading, tax or pension retention obligation) or no legitimate interest of ams OSRAM to further keep the data.

D. Withdrawal of consent

In case you have given ams OSRAM your consent to the processing of your personal data, you have the right to withdraw this consent at any time with effect for the future. This means that any processing based on your consent prior to the withdrawal will remain valid.

E. Your rights

If you are employed in an ams OSRAM company located in the EU, you have the right to demand from ams OSRAM:

- to obtain information regarding your personal data that is being processed,
- to request the correction of incorrect personal data,
- to request the deletion of your personal data,
- to demand the restriction of the processing of personal data,
- to receive a copy of your personal data and
- to object to the processing of personal data.

The ams Corporate Data Privacy Department will be pleased to inform you in detail about all your rights or discuss any of your concerns. To this end, please contact privacy@ams-osram.com or your local Data Protection Coordinator (DPC).

F. ams OSRAM Corporate Data Privacy

ams OSRAM Corporate Data Privacy will support you with all inquiries regarding data protection. Further information regarding the structure and tasks of the ams OSRAM Corporate Data Privacy, the local Data Protection Coordinators (DPC), or additional resources can be found on the intranet sites of the ams OSRAM Corporate Data Privacy Department.

In addition to the abovementioned right that can be exercised at ams-OSRAM, you also have the option to contacting the responsible data protection authorities at any time.

Responsible supervisory authority of ams OSRAM:

Bavarian State Office for Data Protection Supervision
Postbox 1349
91504 Ansbach
Germany

You can find an overview of all national data protection authorities in the EU at: https://edpb.europa.eu/about-edpb/about-edpb/members_en