

EMPLOYEE DATA PRIVACY POLICY

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A. Weidmann's Commitment to Data Privacy

The Policy set forth below outlines the Personal Data that Weidmann (hereinafter referred to as Weidmann or we) may collect, how Weidmann uses and safeguards that data, and with whom we may share it. This Policy is intended to provide notice to individuals regarding Personal Data in an effort to be compliant with the data privacy laws and regulations of the jurisdictions in which Weidmann operates, as well as compliance with its own data privacy compliance processes.

B. Definitions

Data Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of your personal data, while the purposes and means of such processing are determined by legislature.

Data Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Data Subject: you, the Employee.

Personal Data: any information relating to you, the employee, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Personal Data is also commonly referred to as "personal information" or "personally-identifiable information" (PII).

Processing of Personal Data ("processing"): any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Sensitive Personal Data: Personal Data that, if lost, compromised, or disclosed, could result in substantial harm, embarrassment, inconvenience, or unfairness to a Data Subject. Specific examples of sensitive personal data collected by Weidmann are provided in Section [E](#).

Third Party: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

C. Scope

This Policy applies throughout the Weidmann Group, including its wholly owned or controlled subsidiaries and affiliates. Unless otherwise required by a local law or provided for in a subsequent or different notice, this Policy is intended to apply to all Weidmann employees in all operating units of Weidmann globally. Unless otherwise required by a local jurisdiction or provided for in a subsequent or different notice, this Policy applies to all the processing of Personal Data by the Weidmann organization, including its wholly owned subsidiaries, affiliates, and any Third Parties.

While global in scope, elements of this Policy specific to compliance with the European Union's General Data Protection Regulation (GDPR) are provided below.

D. Application of Local Law

This Policy and the corresponding data privacy compliance procedures are designed to set a uniform minimum standard for every Weidmann entity with respect to its protection of Weidmann Employees' Personal Data. Weidmann recognizes that certain laws may impose additional requirements than those described in this Policy. Weidmann will endeavor to collect and process Employees' Personal Data in accordance with local law applicable at the location where such employee Personal Data is collected and processed.

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E. Employee Data Collected

The types of employee data Weidmann collects (directly from you, from public or third party information sources) and shares depends on the nature and location of your position and role within Weidmann and the requirements of applicable laws in the relevant jurisdiction. Examples of this information may include, among other things:

- contact information (e.g., name, home and business addresses, telephone numbers, e-mail addresses, emergency contact information);
- personal information (e.g., date of birth, marital status, birthplace, ID number, nationality, gender, preferred language);
- employment, performance, compensation, and benefits (e.g., hire date, Weidmann identification number, job title, position/grade, attendance, department, business unit, supervisor, site, objectives, projects, performance reviews, performance and leadership ratings, salary, bonus, incentives, awards, retirement, family member/dependents names and dates of birth);
- education and training (e.g., education level, field and institution; competency assessments; professional licenses and certifications; training courses);
- social security number or other national identification number, passport number;
- driver's license number, vehicle license plate number;
- bank account information;
- employment history and letters of recommendation;
- work restrictions and accommodations;
- industrial hygiene exposure assessment and monitoring information;
- agreements that you enter into with Weidmann;
- computer or facilities access and authentication information;
- technical information or log data (e.g. IP address; network connection information);
- grievance resolutions; and
- photographs and other visual images of you.

The examples provided are not all-inclusive, and Weidmann also may collect similar or related information.

Sensitive data: (e.g., data that reveal race, ethnic origin, religious or philosophical beliefs, health, sexual orientation, political opinions, or trade union membership) are collected only where allowed by law and are used and disclosed only to fulfil legal requirements unless employee provides consent for such collection or disclosure.

Certain information collected is required to establish the employment relationship. You may inquire at the time of collection as to whether certain information is required or optional to establish the employment relationship. Further, where permissible, you may inquire about rectification or erasure of any information initially provided.

Weidmann will retain your Personal Data for the length of your employment, plus at least an additional year following termination of the employment relationship. In certain jurisdictions, the length of time following termination may vary depending on local law or can even require permanent retention. You can request the specific time period of retention by contacting your HR manager or using the contact information in this Policy.

F. Purposes of Collecting Personal Data

The collected personal information is processed for Weidmann's business purposes, including establishing, managing, or terminating your employment relationship with Weidmann. Such uses include:

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- determining eligibility for initial employment, including the verification of references and qualifications;
- administering pay and benefits;
- processing employee work-related claims (e.g. worker compensation, insurance claims, etc.);
- establishing training and/or development requirements;
- conducting performance reviews and determining performance requirements;
- assessing qualifications for a particular job or task;
- gathering evidence for disciplinary action or termination;
- establishing a contact point in the event of an emergency (such as next of kin);
- complying with applicable labour or employment statutes;
- compiling directories;
- ensuring the security of company-held information; and
- such other purposes as are reasonably required by Weidmann.

The uses provided are not all-inclusive, and Weidmann also may collect similar or related information consistent with laws and regulations of a particular jurisdiction, and subsequent notice provided or posted as consistent with applicable legal requirements.

G. Disclosure of Personal Data

Weidmann may share your Personal Data with our employees, contractors, consultants, and other parties who require such information to assist us with establishing, managing, or terminating our employment relationship with you, including parties that (a) provide products or services to us or on our behalf or (b) collaborate with us in the provisioning of products or services to you. In some instances, such parties may also provide certain information technology and data processing services to us so that we may operate our business. We may share Personal Data with such parties both in and outside of your home country, and, as a result, your Personal Data may be collected, used, processed, stored, or disclosed in jurisdictions outside of your home country.

When Weidmann shares Personal Data with such parties, our policy is to require that they only use or disclose such Personal Data in a manner consistent with the use and disclosure provisions of this Policy and consistent with the laws and regulations of the relevant country

Further, your Personal Data may be disclosed:

- as permitted or required by applicable law or regulatory requirements. In such a case, we will endeavour to not disclose more personal information than is required under the circumstances;
- to comply with valid legal processes such as court orders;
- as part of Weidmann's regular reporting activities to other parts of Weidmann Group;
- to protect the rights and property of Weidmann;
- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available; or
- with your consent where such consent is required by law.

To a limited extent, Weidmann may need to collect Sensitive Personal Data, Weidmann will ensure that the Data Subject is informed of such collection and processing through notice provided at the outset of the employee's employment with Weidmann and at other times where required by law.

Where required by law, the Data Subject's explicit consent to the processing and particularly to the transfer of such Sensitive Personal Data to Third Parties will be obtained. Appropriate security and protection measures will be provided depending on the nature of the information and the risks associated with the intended uses.

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H. Security and Data Integrity

Weidmann will take reasonable precautions to protect Personal Data in its possession against the risk of loss, misuse, unauthorized access, disclosure, alteration and destruction. Weidmann periodically reviews its security measures in an effort to ensure the privacy of Personal Data.

Weidmann will take reasonable precautions to ensure Personal Data is used only in ways that are compatible with the purposes for which the data was collected or subsequently authorized by the individual. While Weidmann will take reasonable steps to ensure that Personal Data is relevant to its intended use, accurate, complete, and current, Weidmann also relies upon you to assist in providing accurate updates of your Personal Data.

I. EU Data Privacy Rights

If your personal data is processed in the EU or you are a resident of the EU, the EU General Data Protection Regulation (GDPR) grants you certain rights under the law. In particular, the right to access, correct, or delete the personal data Weidmann holds about you.

To the extent required by local law, upon request, Weidmann will grant individuals reasonable access to Personal Data that it holds about them. In addition, at an employee's request, Weidmann will take reasonable steps to permit individuals to correct, amend, or delete information it holds about them. Weidmann will rely on you to assist in providing timely updates to Personal Data held by Weidmann you know to be incorrect.

The data Weidmann collects about employees is required in order to maintain the employment relationships. If you inquire about deletion of certain data needed to maintain the employment relationship, Weidmann may be unable to delete that data in order to continue the employment relationship.

As required by the laws and regulations of the relevant jurisdiction, Weidmann will provide a Data Subject access to the following information related to the Data Subject's Personal Data:

- the purposes of any processing;
- the categories of Personal Data processed;
- the recipients or categories of recipients to whom the Personal Data are to be or have been disclosed, in particular Third Parties;
- the period for which the Personal Data will be stored;
- the existence of the right to request from Weidmann rectification or erasure of Personal Data concerning the Data Subject or to object to the processing of such Personal Data;
- the right to lodge a complaint to the Data Privacy Officer and the contact details of such a person;
- the right to lodge a complaint with the national Data protection Authority (DPA);
- communication of the Personal Data undergoing processing and of any available information as to their source;
- the significance and envisaged consequences of such processing.

To the extent allowed by law Data Subjects can request access to correct, amend, or delete Personal Data by contacting the following: dpo@weidmann-group.com

Legal Basis for Data Processing under the GDPR

Weidmann's processing of personal data is lawful under GDPR because it is necessary for the performance of the employment contract between you, the employee, and Weidmann. Further, Weidmann's processing of personal data is lawful due to the legitimate interest of Weidmann as a controller. In order to operate and have employees to facilitate that operation, Weidmann must collect certain personal data from employee for the purposes already outlined in this Policy.

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J. Swiss Data Privacy Rights

If you are a Swiss resident, the Federal Act on Data protection (FADP) grants you certain rights under the law. In particular, the right to access, rectify, or erase the Personal Data Weidmann holds about you, as well as the right to restrict processing and to object, while specific limitations to these rights may apply due to legal obligations or overriding public interests as defined in the FADP.

To the extent required by local law, upon request, Weidmann will grant individuals access to Personal Data that it holds about them. In addition, at an employee's request, Weidmann will take reasonable steps to permit individuals to rectify or erase information it holds about them. Weidmann will rely on you to assist in providing timely updates to Personal Data held by Weidmann you know to be incorrect.

Weidmann collects data about employees based on Article 13 Paragraph 2 letter b of the FADP i.e. the legal basis is fulfilling the employment contract, including maintaining the employment relationship. If you inquire about erasure of certain data needed to fulfil the employment contract, Weidmann may be unable to erase that data in order to continue the employment relationship. Weidmann may also process your data based on its legitimate interests as an employer. These interests include ensuring a safe and productive work environment and complying with legal and regulatory requirements.

As required by the laws and regulations of Switzerland, Weidmann will provide a data subject access to the following information related to the data subject's Personal Data:

- the purposes of any processing and legal basis;
- the categories of Personal Data processed;
- the (categories of) recipients to whom the Personal Data are to be or have been disclosed;
- the period for which the Personal Data will be stored;
- the existence of the right to request from Weidmann rectification or erasure of Personal Data concerning the data subject or to object to the processing of such Personal Data;
- the right to lodge a complaint to the Data Privacy Officer and the contact details of such a person;
- the right to lodge a complaint with the federal Data Protection and Information Commissioner (FDPIC);
- the source of Personal Data, if available;
- the significance and envisaged consequences of such processing.

Weidmann will only store your Personal Data for as long as necessary for the purpose it was collected. The retention period will depend on various factors, such as legal requirements, contractual obligations, and business needs. To the extent allowed by law Data Subjects can request access to rectify, amend, or erase Personal Data by contacting the following: dpo@weidmann-group.com

Legal Basis for Processing under FADP

Weidmann's processing of personal data is lawful under FADP because it is necessary for the performance of the employment contract between you, the employee, and Weidmann. Further, Weidmann's processing of Personal Data is lawful due to the legitimate interest of Weidmann as an employer and controller (managing the employment relationship, ensuring workplace safety, fulfilling administrative requirement, etc.). Also, Weidmann's processing of Personal Data is lawful because it is necessary for the fulfilment of legal obligations. In order to operate and have employees to facilitate that operation, Weidmann must collect certain Personal Data from employee for the purposes already outlined in this Policy.

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K. United States (US) Data Privacy Rights

There is currently no single comprehensive data protection regulation, but fragmented data privacy regulations across different federal and state laws. If your Personal Data is processed in the US or you are a US resident, data privacy laws or legal requirements applicable in a certain state shall apply and grant you certain rights. In particular, the right to access, correct, opt-out or delete the Personal Data Weidmann holds about you, unless the relevant legislation proscribes any limitations or exceptions based on legal obligations or overriding interests.

To the extent required by local law, upon request, Weidmann will grant individuals reasonable access to Personal Data that it holds about them. In addition, at an employee's request, Weidmann will take reasonable steps to permit individuals to correct, amend, or delete information it holds about them. Weidmann will rely on you to assist in providing timely updates to Personal Data held by Weidmann you know to be incorrect.

Weidmann collects data about employees due to its business purpose of maintaining the employment relationships. If you inquire about deletion of certain data needed for such a business purpose, Weidmann may be unable to delete that data in order to continue the employment relationship. Additionally, Weidmann's data collection is aligned with legitimate business interests, as permitted by applicable US laws, and the collection is minimized to what is strictly necessary for fulfilling job roles or complying with legal requirements.

As may be required by the laws and regulations of the relevant jurisdiction, Weidmann will provide an employee access to the following information related to his/her Personal Data:

- the purposes of any processing;
- the categories of Personal Data processed;
- the (categories of) recipients to whom the Personal Data are to be or have been disclosed;
- the period for which the Personal Data will be stored;
- the existence of the right to request from Weidmann rectification or erasure of Personal Data concerning the employee or to object to the processing of such Personal Data;
- the right to lodge a complaint to the Data Privacy Officer and the contact details of such a person;
- depending on location, the right to lodge a complaint with state Attorneys General, industry regulators or federal agencies;
- the categories of sources of the data;
- whether the data is sold or disclosed;
- the significance and envisaged consequences of such processing.

To the extent allowed by law employees can request access to correct, amend, or delete Personal Data by contacting the following: dpo@weidmann-group.com

Legal Basis for Processing Under Various US States' Privacy Laws

Weidmann's processing of personal data is lawful under relevant US data privacy laws and regulations because it is necessary due to business purposes and legitimate business interests, particularly for the performance of the employment contract between you, the employee, and Weidmann. Further, Weidmann's processing of personal data is lawful due to the legitimate interest of Weidmann as a controller, as well as based on legal obligations, fulfilling contractual obligations or complying with legal requirements. In order to operate and have employees to facilitate that operation, Weidmann must collect certain personal data from employee for the purposes already outlined in this Policy.

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L. People's Republic of China (PRC) Data Privacy Rights

If your Personal Data is processed within China or you are a Chinese citizen outside of China whose Personal Data is being processed, the Chinese Personal Information protection Law (PIPL) and the Data Security Law (DSL) grant you certain rights under the law. In particular, the right to access, rectify, or delete the Personal Data Weidmann holds about you, whereby specific limitations to these rights may apply based on national security, public interest or other legal requirements.

To the extent required by local law, upon request, Weidmann will grant individuals reasonable access to Personal Data that it holds about them. In addition, at an employee's request, Weidmann will take reasonable steps to permit individuals to rectify, amend, or delete information it holds about them. Weidmann will rely on you to assist in providing timely updates to Personal Data held by Weidmann you know to be incorrect.

The data about employees is collected by Weidmann due to a legal basis for collecting and processing (PIPL and the relevant labour laws), particularly in order to maintain the employment relationships i.e. fulfilling contractual obligations. If you inquire about deletion of certain data needed to maintain the employment relationship, Weidmann may be unable to delete that data in order to continue the employment relationship. Furthermore, Weidmann only collects data necessary for the specific employment purpose, thus supporting the principle of minimal processing.

As required by the laws and regulations of the relevant jurisdiction, Weidmann will provide the individual access to the following information related to the individual's Personal Data:

- the purposes and methods of any processing;
- the type of Personal Data collected;
- the recipients to whom the Personal Data are to be or have been disclosed, in particular Third Parties;
- the period for which the Personal Data will be retained;
- the existence of the right to request from Weidmann rectification or erasure of Personal Data concerning the individual or to object to the processing of such Personal Data;
- the right to lodge a complaint to the Data Protection Officer and the contact details of such a person;
- the right to lodge a complaint with the Cyberspace Administration of China (CAC), Personal Information Protection Bureau (PIPB);
- the significance and envisaged consequences of such processing.

To the extent allowed by law individuals can request access to correct, amend, or delete Personal Data by contacting the following: dpo@weidmann-group.com

Legal Basis for Processing under PIPL

Weidmann's processing of Personal Data is lawful under PIPL because it is necessary for the performance of the employment contract between you, the employee, and Weidmann (fulfilling contractual obligations). Further, Weidmann's processing of Personal Data is lawful due to the legitimate business interest of Weidmann as a controller, but only to the extent necessary and not overridden by the individual's rights. In order to operate and have employees to facilitate that operation, Weidmann must collect certain Personal Data from employee for the purposes already outlined in this Policy (e.g. payroll processing, performance evaluation). Finally, complying with legal and regulatory requirements (labor laws, tax regulations) is a common legal basis, whereas the collection of sensitive personal information will require consent.

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M. United Kingdom (UK) Data Privacy Rights

If your personal data is processed in the UK or you are a resident of the UK, the UK General Data Protection Regulation (UK GDPR) grants you certain rights under the law. In particular, the right to access, rectify, erase, restrict processing or object to processing of the personal data Weidmann holds about you, with a response period of one month.

To the extent required by UK GDPR, upon request, Weidmann will grant individuals reasonable access to specific information on the Personal Data that it holds about them. In addition, at an employee's request, Weidmann will take reasonable steps to permit individuals to rectify, amend, or erase information it holds about them. Weidmann will rely on you to assist in providing timely updates to Personal Data held by Weidmann you know to be incorrect.

The data Weidmann collects about employees is necessary in order to fulfil the employment contract or comply with legal obligations, while maintaining the minimization principle. If you inquire about deletion of certain data needed to maintain the employment relationship, Weidmann may be unable to delete that data in order to continue the employment relationship.

Weidmann will provide a Data Subject (as defined in the UK GDPR) access to the following information related to the Data Subject's Personal Data:

- Identity and contact details of the controller;
- the purposes of any processing and the legal base for it;
- the categories of Personal Data processed;
- the recipients or categories of recipients of the Personal Data;
- the period for which the Personal Data will be stored or the criteria used to determine that period;
- the existence of the right to request from Weidmann rectification or erasure or restriction of processing of Personal Data concerning the Data Subject, or to object to the processing of such Personal Data;
- the right to lodge a complaint to the Data Privacy Officer and the contact details of such a person;
- the right to lodge a complaint with the Information Commissioner's Office (ICO);
- the source of the Personal Data, if not obtained from the Data Subject;
- the significance and envisaged consequences of such processing.

To the extent allowed by law Data Subjects can request access to rectify, amend, or erase Personal Data by contacting the following: dpo@weidmann-group.com

Legal Basis for Processing under the UK GDPR

Weidmann's processing of Personal Data is lawful under the UK GDPR because it is necessary for the performance of the employment contract between you, the employee, and Weidmann (contractual necessity and legal obligation, as well as vital interests). Further, Weidmann's processing of Personal Data is lawful due to the legitimate interest of Weidmann as a controller. In order to operate and have employees to facilitate that operation, Weidmann must collect certain personal data from employee for the purposes already outlined in this Policy.

N. Ukrainian Data Privacy Rights

If your personal data is processed in Ukraine or you are a resident of Ukraine, the Law of Ukraine on Personal Data Protection grants you certain rights. These rights are similar to those under the EU GDPR.

Specifically, you will have the right to:

- request confirmation from Weidmann whether your personal data is being processed, and, if so, access the data and certain other information;

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- request that Weidmann correct any inaccurate or incomplete Personal Data it holds about you;
- request that Weidmann delete your personal data, subject to certain exceptions, such as when the data is necessary for Weidmann to fulfil its legal obligations or maintain the employment relationship.

Weidmann will grant you reasonable access to your Personal Data upon request. However, similar to the EU GDPR requirement, Weidmann may be unable to delete certain data needed to maintain the employment relationship.

The information Weidmann will provide you about your personal data includes:

- the purpose for which your data is being processed;
- the categories of data being processed;
- who your data is being disclosed to;
- how long your data will be stored;
- your right to request rectification, amendment, or erasure of your data, to object to its processing;
- your right to lodge a complaint with Weidmann's Data Protection Officer or the Ukrainian Data Protection Ombudsman;
- the source of your data and the potential consequences of its processing;
- the potential consequences of data processing.

You can exercise your rights by contacting dpo@weidmann-group.com.

Legal Basis for Processing under the Law of Ukraine on Personal Data Protection

Weidmann's processing of your Personal Data is lawful under this Law because it is necessary for the performance of your employment contract with Weidmann. Additionally, Weidmann's processing may be legitimate due to its justified interest as an employer, which allows it to collect and process data necessary for its operation and management.

O. Turkish Data privacy Rights

If your personal data is processed in Turkey or you are a resident of Turkey, the Turkish Personal Data Protection Law (KVKK) grants you certain rights. These rights are similar to those provided by the EU GDPR.

Specifically, you will have the right to:

- access your Personal Data held by Weidmann;
- rectify any inaccurate or incomplete Personal Data;
- request erasure of your Personal Data, subject to certain limitations

Weidmann will grant you reasonable access to your Personal Data upon request. You are also entitled to request the rectification or erasure of your data. However, Weidmann may not be able to delete data essential for fulfilling legal obligations or fulfilling the employment relationship.

In accordance with the KVKK, Weidmann will provide you with the following information about your Personal Data:

- the purposes for which your data is processed;
- the categories of data processed;
- the recipients of your data (including any third parties);
- the retention period for your data;
- your right to request rectification, erasure, or objection to the processing of your data;
- your right to lodge a complaint with the Turkish Data Protection Authority (KVKK Kurumu);
- the source of your data and its intended use;
- the potential consequences of data processing.

You can exercise your rights by contacting dpo@weidmann-group.com.

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Legal Basis for Processing under KVKK

Weidmann's processing of your Personal Data is lawful under the KVKK because it is necessary for the performance of your employment contract with Weidmann. Additionally, Weidmann's processing may be based on its legitimate interest as an employer, such as the need to manage its workforce effectively and comply with legal obligations.

P. Mexican Data Privacy Rights

If your Personal Data is processed in Mexico or you are a resident of Mexico, the Federal Law on the Protection of Personal Data Held by Private Parties (LFPDPPP) grants you certain rights under the law. In particular, the right to access, rectify or erase the personal data Weidmann holds about you.

To the extent required by local law, upon request, Weidmann will grant individuals reasonable access to Personal Data that it holds about them. In addition, at an employee's request, Weidmann will take reasonable steps to permit individuals to rectify, amend, or erase information it holds about them, subject to specific limitations based on legal obligations or public interest defined in the LFPDPPP. Weidmann will rely on you to assist in providing timely updates to Personal Data held by Weidmann you know to be incorrect.

The data Weidmann collects about employees is required in order to maintain the employment relationships. If you inquire about deletion of certain data needed to maintain the employment relationship, Weidmann may be unable to delete that data in order to continue the employment relationship.

As required by the laws and regulations of the relevant jurisdiction, Weidmann will provide a Rightsholder (i.e. Data Owner) access to the following information related to the Rightsholder's Personal Data:

- identity and contact details of the controller;
- the purposes and legal basis of any processing;
- the categories of Personal Data processed;
- the recipients or categories of recipients;
- the retention period;
- the Rightsholder's (Data Owner's) rights under the LFPDPPP;
- procedure for exercising Rightsholder's (Data Owner's) rights;
- the right to lodge a complaint to the Data Privacy Officer and the contact details of such a person;
- the right to lodge a complaint with the Mexican Institute for Transparency, Access to Information and Data Protection (INAI).

To the extent allowed by law Rightsholder can request access to rectify, amend, or erase Personal Data by contacting the following: dpo@weidmann-group.com

Legal Basis for Processing under the LFPDPPP

Weidmann's processing of personal data is lawful under LFPDPPP because it is necessary for the performance of the employment contract between you, the employee, and Weidmann (processing based on consent, contract performance and compliance with legal obligations). Further, Weidmann's processing of personal data is lawful due to the legitimate interest of Weidmann as a controller, but only if these interests do not outweigh the rights and freedoms of the Rightsholder (Data Owner). In order to operate and have employees to facilitate that operation, Weidmann must collect certain personal data from employee for the purposes already outlined in this Policy, always focusing on the data minimization principle.

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Q. Brazilian Data Privacy Rights

If your personal data is processed in Brazil or you are a resident of Brazil, the Brazilian General Data Protection Law (LGPD) grants you certain rights under the law. In particular, the right to access, rectify or erase the personal data Weidmann holds about you.

To the extent required by local law, upon request, Weidmann will grant individuals reasonable access to Personal Data that it holds about them. In addition, at an employee's request, Weidmann will take reasonable steps to permit individuals to rectify, amend, or erase information it holds about them, subject to specific limitations based on legal obligations or public interest defined in the LGPD. Weidmann will rely on you to assist in providing timely updates to Personal Data held by Weidmann you know to be incorrect.

The data Weidmann collects about employees is required in order to maintain the employment relationships. If you inquire about deletion of certain data needed to maintain the employment relationship, Weidmann may be unable to delete that data in order to continue the employment relationship.

As required by the laws and regulations of the relevant jurisdiction, Weidmann will provide a Data Subject (titular) access to the following information related to the Rightsholder's Personal Data:

- identity and contact details of the controller;
- the purposes and legal basis of any processing;
- the categories of Personal Data processed;
- the data transfer recipients, if any;
- the retention period;
- the Data Subject's rights under the LGPD;
- procedure for exercising Data Subject's rights;
- the right to lodge a complaint to the Data Privacy Officer and the contact details of such a person;
- the right to lodge a complaint with the National Data Protection Authority (ANPD).

To the extent allowed by law, Data Subject can request access to rectify, amend, or erase Personal Data by contacting the following: dpo@weidmann-group.com

Legal Basis for Processing under the LGPD

Weidmann's processing of Personal Data is lawful under LGPD because it is necessary for the performance of the employment contract between you, the employee, and Weidmann (processing based on consent, contract performance and compliance with legal obligations or legitimate interest). Further, Weidmann's processing of Personal Data is lawful due to the legitimate interest of Weidmann as a controller, but only if these interests do not outweigh the rights and freedoms of the Rightsholder (Data Owner). In order to operate and have employees to facilitate that operation, Weidmann must collect certain personal data from employee for the purposes already outlined in this Policy, always focusing on the data minimization principle.

R. Changes to this Privacy Policy

Weidmann reserves the right to modify this policy from time to time in order that it accurately reflects the regulatory environment and our data collection principles. When material changes are made to this Policy, Weidmann will post the revised Privacy Statement on our website and provide employees subsequent notice where consistent with local laws or regulations.

S. Questions and Comments

If you have any other questions or comments about this Policy as applicable to your Personal Data, please contact: dpo@weidmann-group.com

Date	Author	Approval/Release	Revision	Page
28.03.2024	Vlatka Jukić LL.M.	Stefan Truniger	1.0	12 / 12