

# Privacy Notice for OSRAM Employees

This Privacy Notice describes how your personal data as employee, former employee or applicant of an OSRAM company (“OSRAM”) is processed. It describes how 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 of OSRAM. This is why OSRAM processes your personal data in accordance with the provisions of the EU General Data Protection Regulation and other applicable legal obligations on the protection of personal data and data security.

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

OSRAM processes your personal data in order to fulfill and manage your existing, finished or future employment relationship. In this context, a large number of processing activities are executed that are listed below:

- 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
- Transfer of information in the context of your professional activity
- 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
- Assignments (only affects employees who are delegated during their employment relationship) such as: application for a work permit to government and regulatory agencies

For the purposes named above, OSRAM processes personal data that you have provided yourself or that it collects 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, part-time)
- Information regarding presence and absence
- Information regarding employee assessment and training activities
- Information regarding the health status (e.g. payment of sick benefits)
- if applicable:
  - Information regarding assigned assets (e.g. leased vehicles)
  - Information regarding the organization and implementation of business trips

OSRAM processes your personal data on the basis of the following regulations:

- for the performance of the employment contract,
- to fulfill legal obligations, or
- for the protection of legitimate interests of OSRAM (here the employment contract) 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 company agreements pursuant.

## 2. Disclosure and transfer of personal data

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

- other group companies in particular its headquarter the OSRAM GmbH
- 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 the case the recipients are located in countries without adequate level of data protection, OSRAM has taken measures to ensure appropriate and adequate guarantees for the protection of personal data. 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 OSRAM BCR can be found on the Intranet.
- to external recipients in such countries, the data will only be transferred (i) if they have signed the EU standard contractual clauses with OSRAM or (ii) - for recipients in the USA - if they are certified under the EU/US Privacy Shield

### 3. 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 to keep the data (e.g. trading, tax or pension retention obligation).

### 4. Withdrawal of consent

In case you have given 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.

### 5. Your rights

If you are employed in an OSRAM company located in the EU you have the right to demand from 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 OSRAM Privacy Office will be pleased to inform you in detail about all your rights. Just contact [privacy@osram.com](mailto:privacy@osram.com) or your local Data Protection Coordinator.

### 6. OSRAM Privacy Office

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

In addition to the abovementioned contacts at OSRAM, you also have the option to contacting the responsible data protection authorities at any time.

You can find an overview of the national and international data protection authorities here: [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).