

**Data protection information for employees
in the context of the use of Microsoft Office 365
at Brose**

We would like to inform you comprehensively and transparently about the processing of your personal data in the context of the use of Microsoft Office 365 ("Office 365") at Brose. This data protection information is permanently available in the "Info Point O365" of the Teams application.

Office 365 is a cloud-based collaboration solution. Brose wants to use it to promote cooperation within the Brose Group. Besides the known Office products (e.g. Word, Excel, PowerPoint), it also includes other cloud products (e.g. SharePoint-Online, Exchange-Online) and collaboration tools (e.g. Microsoft Teams).

1. Responsibility

The company where you are employed ("Brose", "We") is the data controller within the meaning of the applicable data protection laws and regulations.

2. Data origin and data processing

Your personal data ("data") will be processed exclusively to the extent that is in accordance with the principles of data protection law and we are permitted or obliged to do so on the basis of applicable legal requirements, in particular the GDPR.

In the course of using Office 365, we usually collect and process the following data from you:

- Master data (e.g. name, username, organizational data)
- Professional contact data (e.g. E-mail, phone number, mobile number)
- Data on the use of IT-systems (Log files, telemetry data, diagnostic data)
- Metadata (Data that accrue in the course of communication)
- Interaction data (e.g. likes, comments)
- Photo and filming (e.g. videos)
- File content data

The master and professional contact details are transferred from Brose-internal user directory to Office 365 as part of the account creation process. The other data are collected in the course of system usage.

3. Purpose of processing and legal basis

The primary legal basis according to the GDPR for the processing of your data are:

- Contractual obligations
- The legitimate interests of Brose and third parties (Microsoft as provider of the system)
- Your consent, unless another legal basis can be applied and we ask for your explicit consent to process your data.

3.1. Contractual obligations

Your data will be processed on the basis of this legal basis for the following purposes:

- Provision of suitable work equipment for the daily office routine (e.g. company e-mail account, telephone system, file storage)
- Film recordings of you as a trainer of an online course

3.2. Legitimate interests of our company

Your data will be processed on the basis of this legal basis for the following purposes:

- System administration (e.g. Registration in systems, user administration)
- IT Security (e.g. by detecting attacks by external or internal attackers)
- Securing the operation
- Improvement of the collaboration platform
- Project specific collaboration

3.3. Consent

Your data will be processed on the basis of this legal basis for the following purposes:

- Records:
In individual cases, meetings may be recorded. In this case, the meeting organizer will ask for your consent before recording. Thereby you will be informed about the further use of the recording.

4. Data Sharing

Within our company, only those persons and offices receive your data that require it to fulfill our contractual and legal obligations. The responsible entity is part of the Brose Group of Companies ("Brose"). In addition, since Brose is a globally operating group of companies, it may also be necessary to transfer your data to another company of the Brose group of companies, including those outside the EU/EEA, in order to fulfill the above purposes. The existence of binding internal data protection regulations and the agreement of the EU standard contractual clauses ensure a uniform level of data protection.

We may also transfer your data to external entities (e.g. authorities, courts or legal advisors) if this is necessary for the assertion, exercise or defense of legal claims. If you are in contact with external parties (e.g. business partners) in the course of your business, parts of your Office 365 profile will be accessible to these external parties. This includes professional contact data as well as the profile photo.

In addition, we use order processors. The transfer of your data to them is carried out in strict compliance with the obligation to maintain confidentiality and the requirements pursuant to Art. 28 DSGVO. In the context of Office 365, these processors include in particular Microsoft Corporation Inc. as the provider for this cloud system. The Office 365 environment is configured by Brose in such a way that data is stored exclusively in the European Union and the smallest possible amount of data is passed on to Microsoft for the purpose of ensuring operation and product improvements. However, so-called log and telemetry data in particular may also be processed by Microsoft in the USA in order to improve its products. Brose has secured this data transfer with the so-called EU standard contractual clauses. For more information from Microsoft about privacy, see <https://www.microsoft.com/de-de/trust-center/privacy>.

5. Storage period and retention periods

All data is treated confidentially and stored in compliance with the applicable legal regulations. Your data will only be stored as long as we need it to fulfill contractual, legal or internal process obligations. As soon as these obligations cease to apply, we will delete your data, unless legal retention obligations (e.g. commercial and tax retention obligations) prevent deletion.

6. More information for data processing in selected applications

The information below refers to Office 365 applications, which go beyond the usually available office software.

6.1. Teams

Microsoft Teams is a collaboration platform with the possibility to perform 1-to-1 chats and calls and conferences. In addition, the platform offers the possibility to manage and share documents, information and tasks within the respective group as part of project and group work. We use teams to collaborate within the Brose Group and also with external partners in order to make communication and collaboration faster and more transparent. In order to comply with the privacy by default principle, certain functions have been deactivated by means of corresponding default settings (e.g. deactivating the recording of meetings).

6.2. Delve

In Delve, you can view your Office 365 profile, which will be visible to all Office 365 users within the Brose Group.

Through the "Discover" function within Delve, you can find information relevant to you. The legal basis for processing your data in this case is the legitimate interest of Brose. Delve thereby automatically suggests documents that could be useful to you. Brose has a legitimate interest in providing a platform that makes it easier for you to find documents that are relevant to you, thus enabling you to work more efficiently. For this purpose, the system collects and analyzes user data. In order to comply with the privacy by default principle, Brose has deactivated this function by default. You can change the "feature settings" yourself and release your data for analysis so that your documents can be displayed to others.

6.3. MyAnalytics

MyAnalytics is a platform that links existing metadata to your Brose calendar as so-called signals and provides you with recommendations for organizing work and increasing effectiveness based on this data. MyAnalytics is deactivated in the default settings. You can activate the platform yourself via the settings and will then be the only person with access to this data.

The legal basis for processing your data in this case is Brose's legitimate interest. Brose has a legitimate interest in providing a platform in which employees can find out about their own work habits and receive recommendations for individual work organization so that the efficiency of their daily work can be increased. Your interests are protected by deactivating MyAnalytics by default. You can activate this application yourself at any time and release your data for analysis. Your data is only visible to yourself. After activating MyAnalytics, you also have the option to deactivate this application at any time.

6.4. Stream

Stream is a service within Office 365 that lets you upload, watch, and share videos. Stream makes it possible to use company videos for further education, training, information or marketing purposes (e.g. image films with project reference created by corporate communications).

If you are recognizably published in videos, this is done either, in our legitimate interest as part of the documentation of events, as part of your contractual relationship with Brose, e.g. as a trainer of an online course, or through your consent, which is explicitly requested before a film project.

6.5. Forms

Forms is a Microsoft program for creating, sharing and scoring surveys. By default, surveys are anonymous. This can only be deactivated by the creator in justified cases (e.g. due to the technical context, project reference). Participation in polls using Microsoft Forms is generally voluntary. The legal basis for processing your data in this case is the legitimate interest of Brose. Brose has a legitimate interest in requesting opinion polls within project groups or departments. In order to protect your personal rights, the software is set up in principle so that primarily anonymous surveys are carried out.

6.6. Yammer

Microsoft Yammer is a service within Office 365 that is used as a non-public Microsoft Yammer is a service within Office 365 that is used as a non-public social network within Brose. The platform enables quick and easy exchange on topics and news. It facilitates the transfer of knowledge and exchange of experience. By enabling employees to network across projects and departments, silos are broken down, hidden expert knowledge is found more easily and innovations and ideas are promoted within the company. By allowing every employee to post on Yammer, a transparent and publicly managed exchange is made possible. The platform only serves the purpose of operational exchange.

No automatic user profiles are formed, e.g. according to activity focus, interests.

The legal basis for processing your data in this case is Brose's legitimate interest. Brose has a legitimate interest in providing a platform in which employees worldwide can easily exchange information and thus transfer knowledge across departments and locations. Their interests are protected by the fact that participation in Yammer is voluntary and can also be terminated at any time. Without your active participation, no personal data will be processed by the platform.

6.7. Security functions

Office 365 offers various security features that help Brose protect company data and your data. To use these functions, it is necessary to also analyze personal data, for example, to detect attack patterns or misuse. Unusual login attempts can also be detected and the system may prompt you to perform two-factor authentication.

The legal basis for processing your data in this case is Brose's legitimate interest. Brose has a legitimate interest in protecting its systems and data (IT security). Organizationally, it is ensured that the log data collected may only be used to ensure operations. Technically, this is flanked by tight storage periods and access restrictions.

7. Your Rights

If our company processes your personal data, you have the following rights within the respective legal scope:

- Right of access, especially about the data stored by the responsible person and their intended use. (Art. 15 GDPR),
- Right to rectification of inaccurate or incomplete data (Art. 16 GDPR),
- Right to erasure, e.g. of unlawfully processed or no longer necessary data (Art. 17 GDPR),
- Right to restriction of processing (Art. 18 GDPR),
- Right to data portability, provided the processing takes place based on consent or to perform a contract or by means of an automated process (Art. 20 GDPR) and
- **object to processing based on Art. 6 (1) (e) or (f) DSGVO if grounds arise from your particular situation (Article 21 DSGVO). After revocation, we will only further process your data if we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or if the processing serves the assertion, exercise or defense of legal claims.**

Insofar as the data processing is based on your consent, you have the right to revoke your consent at any time. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

If you feel that Brose has not adequately addressed your concerns or complaints, you have the right to file a complaint with the appropriate supervisory authority.

8. Contact person

If you have any questions about data protection at Brose, we will be pleased to assist you. If you have any complaints or wish to assert your rights, please contact our data protection officer at datenschutz@brose.com.