

**INFORMATION ON THE PROCESSING OF PERSONAL DATA OF  
EMPLOYEES AND PEOPLE WORKING UNDER  
CIVIL LAW CONTRACT**

In connection with Article 13(1) and (2) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing of Directive 95/46/EC, hereinafter referred to as the GDPR, we inform you that:

- 1) **The Controller of** your personal data is, depending on the entity in which you were employed, the company:
  - a. **MAHLE Shared Services Poland Sp. z o.o.**, with its registered office in Wrocław at ul. Św Mikołaj 18-20, 50-128 Wrocław, entered in the Register of Entrepreneurs of the National Court Register by the District Court for Wrocław – Fabryczna in Wrocław, VI Commercial Division of the National Court Register under number: 0000667147, NIP: 8971836863, REGON: 366780193.
  - b. **MAHLE Thermal and Fluid Systems Sp. z o.o.**, with its registered office in Ostrów Wielkopolski at ul Wodna 15, 63-400 Ostrów Wielkopolski, entered in the Register of Entrepreneurs kept by the District Court Poznań – Nowe Miasto and Wilda in Poznań, IX Commercial Division of the National Court Register, under KRS number 0000546774, NIP 6222788316.
  - c. **MAHLE Poland Sp. z o.o.**, with its registered office in Krotoszyn at Mahle 6 Street, entered into the register of entrepreneurs kept by the District Court Poznań-Nowe Miasto and Wilda, IX Commercial Division of the National Court Register under number 000041086, NIP: 6462353144, REGON 273844545.
  - d. **MAHLE Aftermarket GmbH Sp. Z o.o.**, a branch in Poland with its registered office in Psarach at Pogodna Street 2, 51-180Psary, entered into the register of entrepreneurs kept by the District Court for Wrocław-Fabryczna in Wrocław, IX Commercial Division of the National Court Register under number 0000820862, NIP: 1010009411, REGON 385225580.

(Hereinafter referred to as "**Controller**").

- 2) **Contact** - in matters related to the protection of personal data, you can contact us by e-mail: [iodo@mahle.com](mailto:iodo@mahle.com) or to the address of the Controller's registered office and the Data Protection Officer of the MAHLE Group, using [cdpo@mahle.com](mailto:cdpo@mahle.com) or traditional mail: Data Protection Officer of the MAHLE Pragstr Group. 26-46 70376 from Stuttgart.

- 3) **The purposes of personal data processing and the legal basis for their processing** – your personal data are processed:

- a) to perform an employment contract or a civil law contract – pursuant to Article 6(1)(b) of the GDPR;
- b) in order to perform legal obligations by the Controller and exercise special rights vested in the Controller or you related to your employment or civil law contract (e.g. tax obligations, obligations related to social insurance, obligations related to the company social benefits fund, running employee capital plans, employing disabled persons, membership of trade

unions, resulting from the Act on the Protection of Whistleblowers and the Labour Code, including in the scope of referrals to medical examinations, as well as other acts imposing legal obligations on the Controller or granting him or you special rights related to the processing of personal data) – on the basis of Article 6(1)(c) of the GDPR and on the basis of Article 9(2)(b) and (g) of the GDPR (in the scope of sensitive data, e.g. health) in connection with the relevant legal provisions;

c) to conduct video monitoring, issue an ID and an access card to ensure the safety of persons and property located in the MAHLE area, as well as to keep information secret, the disclosure of which could expose the Controller to harm – pursuant to Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the Controller, which is ensuring the safety of persons and securing the Controller's land and property);

b) in order to maintain contact between the Controller and an employee or a person employed on the basis of a civil law contract in matters concerning employment – pursuant to Article 6(1)(a) of the GDPR (consent);

e) in order to provide employees and persons employed on the basis of civil law contracts employee benefits (including group insurance, health care) – pursuant to Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the Controller, which is providing employees with benefits in the form of allowances;

f) in order to use the image of an employee or a person employed on the basis of a civil law contract in internal and promotional materials of the Controller – pursuant to Article 6(1)(a) of the GDPR (consent);

g) in order to organize and implement the recommendation program – pursuant to Article 6(1)(f) of the GDPR, i.e. the legitimate interest consisting in acquiring new employees through the recommendation program;

h) in order to establish, pursue or defend against claims and ensure accountability – on the basis of Article 6(1)(f) of the GDPR, i.e. the legitimate interest which is the protection of the Controller's legal interests).

4) **Period of storage of personal data** - your personal data will be stored for the purposes specified in:

a) point 3(a) – for the duration of the contract;

b) point 3(b) – for the time resulting from the law. Employee records will be kept for the period of employment and for a period of 10 years from the end of the calendar year in which the employment relationship terminated or expired, unless separate provisions provide for a longer period of retention of employee records;

c) point 3(c) – for 72 hours from recording the recording;

d) point 3(d) – for the duration of the contract or withdrawal of consent to the processing of data;

e) point 3(e) – for the duration of the contract;

f) point 3(f) – until the consent to the processing of data is withdrawn;

g) point 3(g) – for the period of implementation of the recommendation program, i.e. until the end of the recruitment process with the participation of the recommended person and granting the bonus.

h) point 3(h) – until the limitation of claims (normally 3 years from the date of the claim)

Detailed data retention periods may be presented to you when you provide personal data.

5) **Your rights** - you have the right to access the content of your personal data, the right to rectify them, delete them, the right to limit their processing and the right to transfer data.

6) **The right to object** – you also have the right to object to the processing of personal data.

7) **The right to withdraw consent** - to the extent that data processing is based on consent, you have the right to withdraw consent at any time, which, however, does not affect the lawfulness of processing based on consent before its withdrawal.

8) **The right to lodge a complaint to the supervisory authority** - you have the right to lodge a complaint to the President of the Office for Personal Data Protection, when you consider that the processing of personal data concerning you violates the provisions on personal data protection.

9) **Consequences of not providing personal data** - providing personal data by you is a statutory requirement and a requirement of the Controller, unless it is indicated that it is voluntary. Failure to provide personal data necessary for the performance of the contract or performance of duties by the Controller may result in the inability to establish an employment relationship with you / establish cooperation on the basis of a civil law contract or the termination of the contract. Providing personal data for the purposes related to the use of employee benefits, the use of image for promotional purposes, the use of private contact data, participation in the recommendation program is voluntary and does not affect the possibility of concluding and performing the contract.

10) **Recipients of data** - the recipient of your personal data will be:

a) public entities, to the extent that the Controller, as an employer or a party to a civil law contract, is obliged to make them available, on the basis of applicable law;

b) companies from the MAHLE Group;

c) entities processing personal data on behalf of the Controller, e.g. providing IT services, property protection, HR and payroll, accounting and legal services;

d) other data controllers – e.g. social media operators, providers of employee benefits (e.g. group insurance, health care), financial institution managing PPK, occupational medicine unit.