

## Personal Data Protection Statement of the Siegfried Group

Version effective as of April 15, 2019

With this Personal Data Protection Statement we, Siegfried Holding AG and other European / Swiss companies of the Siegfried-Group (hereinafter **Siegfried, we** or **us**), describe how we collect and further process any information that identifies, or could reasonably be used to identify, any person (hereinafter **personal data**). We value the privacy of employee and non-employee personal information as set forth in our Code of Business Conduct as well as other group specific policies.

This Personal Data Protection Statement is a general and not necessarily a comprehensive description of our data processing. It is possible that other data protection statements are applicable to specific circumstances.

This Personal Data Protection Statement is in line with the EU General Data Protection Regulation (**GDPR**). Although the GDPR is a regulation of the European Union (**EU**), it may be relevant for non-EU companies of Siegfried as well, in particular as the Swiss data protection legislation is heavily influenced by the law of the European Union. In addition, companies outside of the EU or the European Economic Area (**EEA**) must comply with the GDPR in certain cases.

### 1. Responsibility

Siegfried Holding AG, Untere Bruehlstrasse 4, 4800 Zofingen, Switzerland, is responsible for the processing of personal data as described in this data protection statement. You can notify us of any data protection related question, concern or breach using the following contact details: Siegfried Holding AG, Legal Compliance Office, Untere Bruehlstrasse 4, 4800 Zofingen, Switzerland; [www.siegfried.ethicspoint.com](http://www.siegfried.ethicspoint.com); or [legalcompliance@siegfried.ch](mailto:legalcompliance@siegfried.ch).

### 2. Collection and Processing of Personal Data

If you provide us with personal data of other persons (such as family members, work colleagues), please make sure that the respective persons are aware of this Personal Data Protection Statement and that you only provide us with their data, if you are allowed to do so and such personal data is correct.

Insofar as it is permitted to us, we obtain certain personal data from publicly accessible sources (e.g. commercial registers, or internet) or we may receive such information from affiliated companies of Siegfried or third parties. Apart from data you provided to us directly, the categories of data we receive about you from third parties include, but are not limited to, information from public registers, data received in connection with your professional role and activities (e.g., in order to conclude and carry out contracts with your employer), information about you in order to conclude or process contracts with you or with your involvement (e.g. references), information regarding our customers and other business partners for the purpose of purchasing or performing services to you or by you, information about you found in the media or internet (insofar as indicated in the specific case, e.g. in connection with job applications), your contact details, data in connection with your use of our websites (e.g., cookies, date and time of your visit, sites and content retrieved, localization data).

### 3. Purpose of Data Processing and Legal Grounds

We primarily use collected data in order to conclude and process contracts with our employees, in the context of respective employment relationship, customers and other business partners, in particular in connection with our Contract Development and Manufacturing (CDM) services to our customers and the procurement of products and services from our suppliers and subcontractors, as well as in order to comply with our domestic and foreign legal obligations.

In addition, in line with applicable law and where appropriate, we may process your personal data and personal data of third parties for the following purposes, which are in our (or, as the case may be, any third parties') legitimate interest, such as:

- manufacturing our products or otherwise performing our services;
- running our websites and other social media platforms on which we are active;
- communication with third parties and processing of their requests (e.g., job applications);
- advertisement and marketing (including organizing events), provided that you have not objected to the use of your data for this purpose (if you are part of our customer base and you receive our advertisement, you may object at any time and we will place you on a blacklist against further advertising mailings);
- asserting legal claims and defense in legal disputes and official proceedings;
- prevention and investigation of criminal offences and other misconduct (e.g. conducting internal investigations, data analysis to ensure legal compliance);
- ensuring our operation, including our IT, our websites, and other social media platforms;
- video surveillance to protect our domiciliary rights and other measures to ensure the safety of our products, premises and facilities as well as protection of our employees and non-employees and assets owner by or entrusted to us (such as e.g. access controls, visitor logs, video data, network recordings); or the
- acquisition and sale of business divisions, companies or parts of companies and other corporate transactions and the transfer of personal data related thereto as well as measures for business management and compliance with legal and regulatory obligations as well as internal regulations of Siegfried.

If you have given us your consent to process your personal data for certain purposes (for example when registering to receive newsletters, when applying for open positions or when ordering our services), we will process your personal data within the scope of and based on this consent, unless we have another legal basis, provided that we require one. Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.

### 4. Cookies / Tracking and Other Techniques Regarding the Use of our Website

We typically use "cookies" and similar techniques on our websites, which allow for an identification of your browser or device. Besides cookies that are only used during a session and deleted after your visit of the website ("session cookies"), we may use cookies in order to save user configurations and other information for a certain time period (e.g., two years) ("permanent

cookies"). Notwithstanding the foregoing, you may configure your browser settings in a way that it rejects cookies.

By using our websites, consenting to the receipt of newsletters or applying for an open position you agree to our use of such techniques. If you object, you must configure your browser or e-mail program accordingly.

We may use Google Analytics, Umantis, TrackWise or similar services on our website. These are services provided by third parties, which may be located in any country worldwide (in the case of Google Analytics Google LLC is in the U.S., [www.google.com](http://www.google.com)) and which allow us to measure and evaluate the use of our website (on an anonymized basis). For this purpose, permanent cookies are used, which are set by the service provider. The service provider does not receive (and does not retain) any personal data from us, but the service provider may track your use of the website, combine this information with data from other websites you have visited and which are also tracked by the respective service provider and may use this information for its own purposes (e.g. to controlling of advertisements). If you have registered with the service provider, the service provider will also know your identity. In this case, the processing of your personal data by the service provider will be conducted in accordance with its data protection regulations.

## 5. Datatransfer and Transfer of Data Abroad

In the context of our business activities and in line with the purposes of the data processing set out in Section 3, we may transfer data to third parties, insofar as such a transfer is permitted and we deem it appropriate, in order for them to process data for us or, as the case may be, their own purposes. In particular, the following categories of recipients may be concerned:

- Our vendors and other service providers (within Siegfried or externally, such as e.g. banks, insurances), including processors (such as e.g. IT providers, recruiting partner);
- customers, distributors, subcontractors and other business partners;
- domestic and foreign authorities or courts;
- the public, such as users of our websites and other social media platforms;
- acquirers or parties interested in the acquisition of business divisions, companies or other parts of Siegfried;
- other parties in possible or pending legal proceedings; or
- affiliates of Siegfried (together **Recipients**).

Certain Recipients may be located in any country worldwide. In particular, you must anticipate your data to be transmitted to any country in which Siegfried is represented by affiliates (<http://www.siegfried.ch/about-siegfried/locations>) as well as to other countries where our service providers are located (such as Microsoft, SAP). If we transfer data to a country without adequate legal data protection, we ensure an appropriate level of protection as legally required by way of using appropriate contracts (in particular on the basis of the standard contract clauses of the European Commission, which can be accessed [here](#)) or we rely on the statutory exceptions of consent, performance of contracts, the establishment, exercise or enforcement of legal

claims, overriding public interests, published personal data or because it is necessary to protect the integrity of the persons concerned.

## 6. Retention Periods for your Personal Data

We process and retain your personal data as long as required for the performance of our contractual obligation and compliance with legal obligations or other purposes pursued with the processing, i.e. for the duration of the entire business relationship (from the initiation, during the performance of the contract until it is terminated) as well as beyond this duration in accordance with legal retention and documentation obligations. Personal data may be retained for the period during which claims can be asserted against our company or insofar as we are otherwise legally obliged to do so or if legitimate business interests require further retention (e.g., for evidence and documentation purposes). As soon as your personal data are no longer required for the above-mentioned purposes, they will be deleted or anonymized, to the extent possible. In general, shorter retention periods apply for operational data (e.g., system logs).

## 7. Data Security

We have taken appropriate technical and organizational security measures to protect your personal data from unauthorized access and misuse such as internal policies, training, IT and network security solutions, access controls and restrictions.

## 8. Obligation to Provide Personal Data To Us

In the context of our business relationship you must provide us with any personal data that is necessary for the conclusion and performance of a business relationship and the performance of our contractual obligations (as a rule, there is no statutory requirement to provide us with data). Without this information, we will usually not be able to enter into or carry out a contract with you (or the entity or person you represent). In addition, the website cannot be used unless certain information is disclosed to enable data traffic (e.g. IP address).

## 9. Your Rights

In accordance with and as far as provided by applicable law (as is the case where the GDPR is applicable), you have the right to access, rectification and erasure of your personal data, the right to restriction of processing or to object to our data processing in addition to right to receive certain personal data for transfer to another controller (data portability).

Please note, however, that we reserve the right to enforce statutory restrictions on our part, for example if we are obliged to retain or process certain data, have an overriding interest (insofar as we may invoke such interests) or need the data for asserting claims (legal hold). If exercising certain rights will incur costs on you, we will notify you thereof in advance. We have already informed you of the possibility to withdraw consent in Section 3 above. Please further note that the exercise of these rights may be in conflict with your contractual obligations and this may result in consequences such as premature contract termination or involve costs. If this is the case, we will inform you in advance unless it has already been contractually agreed upon.

In general, exercising these rights requires that you are able to prove your identity (e.g., by a copy of identification documents where your identity is not evident otherwise or can be verified in another way). In order to assert these rights, please contact us at the addresses provided in Section **Fehler! Verweisquelle konnte nicht gefunden werden.** above.

In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent data protection authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

## 10. Amendments of this Data Protection Statement

We may amend this Personal Data Protection Statement at any time without prior notice. The current version published on our website shall apply. If the Personal Data Protection Statement is part of an agreement with you, we will notify you by e-mail or other appropriate means in case of an amendment.

\* \* \* \* \*