

Data protection information for applicants and employees

Version 1 dated 25/05/2018

dormakaba UK and Ireland
Dorma UK
Wilbury Way
Hitchin
SG4 0AB

Kaba Ltd
Lower Moor Way
Tiverton
EX16 6SS

Dear Sir / Madam,

At dormakaba we take the protection of your personal data very seriously, and will always process your personal data in compliance with the legal data protection regulations. In the following, terms such as “applicant”, “employee”, etc. will be used in a gender-neutral manner.

Regardless of whether you are an applicant or an employee, with the following data protection information, we want to provide you with an overview of how we process your personal data and information regarding what your rights are in this regard. The term “employee” also includes interns, diploma students, student trainees, seasonal workers and temporary employees.

A. Responsible authority and data protection officer

- a. The following company is responsible for the processing of your personal data

Dorma UK Ltd
Wilbury Way
Hitchin
SG4 0AB

Kaba UK Ltd
Lower Moor Way
Tiverton
EX16 6SS

- b. Our data protection officer can be contacted at

dormakaba UK and Ireland
Dorma UK Ltd
FAO Data Protection Officer
Wilbury Way
Hitchin
SG4 0AB
gdpr.gb@dormakaba.com

B. How do we collect your personal data?

We process personal data, which we receive from you when you make contact with us.

With regard to applicants, this takes place during a job application, when a recruitment service provider provides us with your contact details or application documents, or if you apply directly to us by e-mail. Even if you hand your application to us in person, data collection still takes place.

After collection, this personal data is processed further as described below in the course of the

Personal data required for the purposes of your employment at Dorma UK Ltd or Kaba UK Ltd include:

- personal identification (passport photo for company ID) and contact information (e.g. title, name, address, date of birth, religious denomination, nationality, sex, marital status, whether you have children, e-mail address, telephone and mobile number);
- Payment details (e.g. your IBAN and BIC);
- Information about your work or residence permit;
- Data about your personal qualifications, e.g. school leaving certificate, vocational qualifications, language skills, certifications;
- CV (former employers and roles);
- Health insurance status, VAT ID number, tax information;
- Former work references;
- Insurance (e.g. direct insurance, occupational pension schemes, insolvency insurance, etc.);
- If applicable: Disability status; maternity and parental leave; employers' liability insurance association classification;
- Organizational allocation, supervisor, cost center, working hours model;
- Pay (basic pay, recurring payments and deductions, one-off payments, occupational and survivor's pensions); seizures; company car (non-cash benefits, own shares);
- If applicable: Enrolment or internship certificate;
- If applicable: assignments, secondary employment;
- Assessments (probationary period assessment, performance assessment, etc.), cautions, warnings;
- If applicable: Work and commuting accidents;
- Entry date; transfer and departure date; reason for departure;
- Clock-in and clock-out bookings, holiday, special holidays, time balance, notice periods;
- If applicable, your car registration plate.

If you are employed on the basis of a temporary contract, this data has already been received and will be transferred to Dorma UK Ltd or Kaba UK Ltd by the hirer for the purpose of the initiation or fulfilment of the contract.

C. Purpose and legal basis of data processing

We process your personal data for the purpose of establishing, fulfilling and terminating your employment.

1. Establishing, fulfilling and terminating the contract

Initially, the purpose of processing the data is to select suitable candidates. As early as the contract initiation stage, we are legally obliged to subject your data to an "anti-terror screening".

If we enter into an employment contract with you, the storage and usage of your personal data is required in order to uphold our obligations, i.e. the payment of your salary or provision of other salary components, such as company cars and other services.

We also require your data in order to be able to train you as an employee, and to develop tailored training activities and career opportunities together with you.

If we do not enter into an employment contract with you, further processing is required in the event of any claims arising from any Employment Tribunal claims

The Human Resources department will create a personnel file for the management of your personal details. This contains both your applicant details, and any documents and contract amendments resulting from your ongoing employment with dormakaba.

Depending on your individual role, it is possible that a reliability or security check of your background is required before we can assign you to certain customers or areas (e.g. aviation security).

Within the course of human resources development activities (workshops, team training, coaching, management training, individual development measures), personal data is regularly processed in accordance with the objective, purpose and progress of the activity. Generally, this includes the

name of the participants, their professional contact details, and the results of workshops or individual activities.

If you are contractually entitled to a company car, we are legally obliged to carry out regular checks that you are in possession of a valid driver's license.

Operating data is collected in all our factory buildings for the purpose of process optimisation and identification of training requirements, including working hours.

2. For the investigation of criminal offences

We reserve the right to process personal data of employees for the purpose of investigating criminal offences. This requires clear, documentable indications to support the suspicion that the person concerned has committed a criminal offence within the scope of their employment relationship and that the processing of this data is necessary for the investigation and has undergone a balancing of interests.

D. Recipients of personal data

Within our company, your data can be accessed by those individuals or offices who require them to perform their respective role in the company, or to fulfill our contractual or legal obligations.

- Human resources development information will be shared between the Human Resources department and the accompanying trainers, coaches or other human resources development service providers. These service providers are contractually bound to a non-disclosure agreement and an order processing contract, and are also obligated to comply with the legal data protection regulations on their part.
- Under certain conditions, personal data may also be transferred to public institutions (e.g. tax authorities, job centers), social insurance agencies, judicial and law enforcement authorities (e.g. police, prosecution offices, courts), lawyers and notaries, as well as accountants.
- We may also transfer your data to a travel agency, airline provider, hotel for the purpose of organizing your business trip.
- If you are contractually entitled to a company car, the lease company and or fleet management provider will receive your contact details.

Specifically, the following recipients may receive your personal data:

- Employee benefits providers;
- Payroll provider;
- Trade associations;
- Financial authorities;
- Social insurance agencies, e.g. health insurance providers, pension insurance companies, etc.;
- Aviation security authority;
- Insurance companies;
- Accountants;
- Social security and tax auditors;
- ISO auditors;
- Authorities (within the scope of assignments);
- Chamber of industry and commerce, universities, colleges (in the case of apprentices);
- Occupational healthcare provider;
- Health & Safety Executive
- Leasing companies

E. Transfers to third countries or international organizations

As a rule, we only transfer your personal data to recipients within the European Economic Area.

F. Duration of storage

We will always delete your personal data, once the purpose of processing has expired, all mutual obligations have been fulfilled and no other legal obligations or justifications for the storage of your data exist to the contrary.

Legal data storage obligations arise in various UK statutes. We will always delete your personal data, once the purpose of processing has expired, all mutual obligations have been fulfilled and no other legal obligations or justifications for the storage of your data exist to the contrary. If required, e.g. to secure evidence within the scope of a criminal investigation, employee data will be stored until expiry of the legal limitation period. If an application does not result in employment, your application and the associated personal data will be deleted after six months to enable us to dispute any claims arising from an Employment Tribunal claim.

G. Your data protection rights

You have the following rights to data protection in accordance with the legal provisions:

1. the right to information about the personal data stored by Dorma UK Ltd or Kaba UK Ltd (article 15 EU-GDPR) as well as
2. the right to rectification of your data (article 16 EU-GDPR),
3. the right to deletion of your data (article 17 EU-GDPR),
4. the right to restrict the processing of your data (article 18 EU-GDPR),
5. the right to the portability of your data (article 20 EU-GDPR),
6. and the right to object (article 21 EU-GDPR)

You also have the right to complain to the Information Commissioner's Office <https://ico.org.uk/>.

H. Am I required to provide you with my personal data?

As part of the employment relationship, you must provide the personal data that is required for the initiation, fulfillment and termination of the employment relationship and for the fulfillment of the associated contractual obligations, or that we are legally obliged to process. Without this data, we are generally unable to enter into or fulfill an employment contract with you.

I. Right of objection

1. The right of objection in individual cases

You have the right to object to the processing of your personal data at any time, for reasons arising from your particular personal situation, if processing takes place on the legal basis outlined in article 6 para. 1 point e EU-GDPR (processing in the public interest) and art. 6 para. 1 point f EU-GDPR (data processing for the purpose of balancing of interests). This also applies to profiling that is supported by this condition.

If you file an objection, we will refrain from processing your personal data, unless we can demonstrate mandatory, legitimate reasons for processing such data that outweigh your interests, rights and freedoms, or serve the purpose of enforcing, exercising or defending legal claims.

2. Recipient of your objection

You can send your objection in any format with the subject line "Objection", stating your name, address and date of birth, to:

Data Protection Officer, Dorma UK Ltd, Wilbury Way, Hitchin or gdpr.gb@dormakaba.com.

Thank you for taking the time to read our data protection information for applicants and employees.