

**DATA PROTECTION INFORMATION FOR OUR EMPLOYEES (M/F/D)  
HOW WE HANDLE YOUR DATA AND YOUR RIGHTS  
INFORMATION PURSUANT TO ARTICLES 13, 14 AND 21 OF THE GENERAL DATA PROTECTION REGULATION (GDPR)**

The following information provides you, as an employee (m/f/d), with an overview of how we process your personal data and your rights.

**1. WHO IS RESPONSIBLE FOR DATA PROCESSING AND WHO CAN I CONTACT?**

The responsible body is

**KAMAT GmbH & Co. KG**  
Salinger Feld 10  
58454 Witten  
Telephone: +49 2302 89 03 0  
Email: [info@kamat.de](mailto:info@kamat.de)

You can contact our data protection officer at:

**GDI Gesellschaft für Datenschutz und Informationssicherheit mbH**  
**Mr Olaf Tenti**  
Alter Schloßweg 30, 58119 Hagen  
Telephone: +49 (0) 2331/356832-0  
Email [datenschutz@gdi-mbh.eu](mailto:datenschutz@gdi-mbh.eu)

**2. WHAT SOURCES AND DATA DO WE USE?**

We process data that you provide to us during the recruitment process or that we have received from third parties within the scope of the existing employment contract or with your permission. This is done on a recurring basis in accordance with legal requirements before you start work and during the term of the employment contract. This includes, in particular, ad hoc requests for tax-related information from the relevant tax authority and information about periods of incapacity for work from the respective health insurance fund.

In particular, the following personal data and categories of data are processed for the purposes specified in section 3:

- Personal details (e.g. first name, surname, contact details, address)
- Data relating to your qualifications (e.g. educational and professional qualifications, certificates, language skills, additional qualifications)
- Data relating to your CV (start, end, location and duration of school education, training, studies, further training and professional activities)
- Identity card number
- Tax ID
- National insurance number
- Bank
- Religious affiliation
- Health data
- Marital status
- Number of dependent children, if applicable
- Details of working hours and wages
- Time recording
- Log files
- Access control
- Logbooks
- Accident reports
- Machine data
- Operating data

The aforementioned data may also contain special categories of data within the meaning of Art. 9 (1) GDPR, which enjoy special protection under the GDPR and may only be processed under specific conditions (further information under section 4).

**3. WHY DO WE PROCESS YOUR DATA (PURPOSE OF PROCESSING) AND ON WHAT LEGAL BASIS?**

Below, we provide information about why and on what legal basis we process your data.

**3.1 TO IMPLEMENT AND TERMINATE THE EMPLOYMENT RELATIONSHIP (ART. 6(1)(B), ART. 88(1) GDPR, SECTION 26 FEDERAL DATA PROTECTION ACT – BDSG)**

We process your personal data for the proper execution of the employment relationship. The legal basis for this is Art. 6 para. 1 lit. b GDPR in conjunction with Art. 88 para. 1 GDPR and § 26 para. 1 BDSG.

Only personal data that is necessary for the employment relationship is processed, in particular master and contact data, contract data, and billing and remuneration data.

The processing is carried out for the purpose of managing the employment relationship and fulfilling legal obligations.

In addition, collective agreements (e.g. works agreements) may constitute an additional basis for processing under data protection law in

accordance with Art. 6(1)(b) GDPR in conjunction with Art. 88(1) GDPR and § 26(4) BDSG.

**3.2 WITHIN THE FRAMEWORK OF THE BALANCING OF INTERESTS (ART. 6(1)(F) GDPR)**

We may also use your data on the basis of a balancing of interests to protect our legitimate interests or those of third parties. This may be done for the following purposes in particular:

- General business management;
- Management, process optimisation and work organisation;
- Economic and personnel planning;
- Preparation of personnel and other company decisions;
- Security and quality control;
- Exercising employee rights;
- Assertion of legal claims and defence in legal disputes;
- Prevention and investigation of criminal offences;
- Ensuring IT security and IT operations;
- Internal communication purposes;
- Other administrative purposes.

For your personal safety, to uphold house rules and to prevent criminal offences against the company, there are areas under video surveillance. We store the video data for a period of 72 hours. If we evaluate and store data for use in civil or criminal proceedings, it will be deleted once the proceedings have been concluded.

Our interest in the respective processing arises from the respective purposes and is otherwise of an economic nature (efficient task fulfilment, sales, avoidance of legal risks).

**3.3 ON THE BASIS OF YOUR CONSENT (ART. 6(1)(A) GDPR, SECTION 26(2) BDSG)**

If you have given us your consent to process personal data, this consent forms the legal basis for the processing specified therein. Consent can be revoked at any time. This also applies to the revocation of declarations of consent that were given before the GDPR came into force, i.e. before 25 May 2018. The revocation only takes effect for the future. Processing that took place before the revocation is not affected. A revocation can be made to the office named in section 1.

**3.4 TO FULFILL LEGAL OBLIGATIONS (ART. 6 (1) (C) GDPR)**

We may process your data to the extent necessary to comply with legal obligations to which we are subject. This applies in particular to the storage and disclosure of wage and salary data to tax authorities and social security institutions.

**3.5. SPECIAL INFORMATION ABOUT OUR "WHISTLEBLOWING SYSTEM"**

We accept reports of legal violations through the reporting system we have set up. The reporting system can be used in particular for reporting and disclosing information about violations within the meaning of Section 2 of the Whistleblower Protection Act (HinSchG). The person providing the information may also disclose data relating to other employees if this is relevant to the reported matter, including data of special categories. Furthermore, personal data relating to you may be collected from third parties if the investigations reveal a connection with you, or if third parties disclose data relating to you for other reasons in the course of the investigations. Collected data will be stored and taken into account in the investigation and evaluation of the actual facts and, if necessary, included in a final report. Processing in accordance with this section 3.5 may relate to you as the person concerned by the report or to you as the reporting person.

We process your data in accordance with the legal bases set out below:

- **Implementation of the employment relationship** – Art. 6(1)(b), Art. 88(1) GDPR, Section 26(1) BDSG: We may process your data for the purpose of investigating and detecting breaches of employment contract obligations. This is necessary for the performance and termination of the employment relationship.
- **Balancing of interests** – Art. 6(1)(f) GDPR: We process your data on the basis of a balancing of interests. The legitimate interest lies in the investigation of legal violations. This interest may also exist in favour of third parties, in particular our business partners who are subject to the Supply Chain Due Diligence Act (LkSG) and who are therefore obliged to set up appropriate complaint systems in accordance with Section 8 LkSG. Your data may be passed on to these third parties in the exercise of our duty of care if this data is necessary to investigate legal violations to the detriment of the third party.
- **Consent** – Art. 6(1)(a) GDPR, Art. 9(2)(a) GDPR: If you have given us your consent to process personal data, the respective consent

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is the legal basis for the processing. The subject matter of the processing then results from the consent given in each case.

- **Legal obligation** – Art. 6(1)(c) GDPR: We process personal data to the extent that we are legally obliged to do so. In future, this may result in particular from provisions of the Whistleblower Protection Act (HinSchG).
- **Works agreement** – Section 26(1) sentence 1, (4) sentence 2 BDSG: The processing and, where applicable, transfer of personal data may also be carried out on the basis of a works agreement, which may replace the consent required on your part. The subject matter of the data processing and transfer is then determined by the respective works agreement on the reporting system.

#### 4. PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA AND LEGAL BASIS

Insofar as special categories of personal data within the meaning of Art. 9 (1) GDPR are processed in the context of the employment relationship, the processing serves primarily to exercise rights or fulfil legal obligations under labour law, social security law and social protection law (e.g.: disclosure of health data to the health insurance fund, recording of severe disability for the purpose of recording and granting statutory additional leave, determination of the severe disability levy, processing of religious affiliation for the purpose of paying church tax). This is done on the basis of Art. 9 (2) lit. b in conjunction with Art. 88 GDPR and § 26 (3) BDSG.

In addition, the processing of health data may be necessary for the purposes of health care or the assessment of working capacity in accordance with Art. 9 (2) (h), (3) GDPR in conjunction with Section 22 (1) (b) BDSG.

In addition, the processing of special categories of personal data may be based on consent pursuant to Art. 9 (2) (a) GDPR in conjunction with Section 26 (2) BDSG (e.g. occupational health management). The consent given is revocable at any time. You can send your revocation of consent to the contact details given in section 1. Data processing carried out prior to revocation remains unaffected by the revocation and remains lawful. If data storage was based on consent and there are no other legal grounds for storage, we will delete the data concerning you after revocation. Please also note the information you have received or will receive in connection with your consent.

Furthermore, special categories of personal data may be processed within the framework of the notification system we have set up if the processing is necessary to enforce our claims or defend ourselves against claims by third parties or within the framework of criminal or administrative proceedings and/or to prepare and examine the aforementioned (Art. 9 (2) (f) GDPR).

If personal data is processed for any other purpose mentioned in this privacy policy, we will inform you in advance.

#### 5. WHO RECEIVES MY DATA?

Your data will only be passed on if permitted by law. The data referred to in section 2 will be transferred to public authorities and institutions if there is a legal obligation to do so or if you have given your consent to such transfer. Such public authorities may include, in particular, the tax authorities, customs authorities, statutory health and social insurance funds, professional associations, professional chambers, but also trade supervisory authorities.

In addition, personal data may be transferred to other recipients outside the company if this is necessary to fulfil contractual and legal obligations as an employer. These may include, for example:

- Your respective salary account bank (SEPA payment provider);
- Health insurance companies;
- agencies that guarantee claims from company pension schemes;
- agencies that pay out or enable the payment of capital-forming benefits;
- Third-party debtors in the event of wage and salary garnishments;
- Insolvency administrators in the event of personal bankruptcy.

Within our company, only those departments that need your data to fulfil our contractual and legal obligations or to perform their respective tasks will receive it. Our vicarious agents may also receive data for the aforementioned purposes. These include, for example, tax consultants, law firms, etc.

Personal data relating to you may also be transferred to the reporting office commissioned by us if it conducts investigations into reports within the meaning of the Whistleblower Protection Act (HinSchG) and/or reports are received directly by the reporting office in accordance with the subject matter of our commission. The reporting office acts on its own responsibility under data protection law and not by way of order processing within the meaning of Art. 28 GDPR.

Furthermore, personal data may be transferred for the purpose and within the scope of order processing (Art. 28 GDPR), in particular to IT service providers.

#### 6. HOW LONG IS THE DATA STORED?

Where necessary, we process your personal data for the duration of the employment relationship. We are subject to various storage and documentation obligations, which arise from the German Commercial Code (HGB) and the German Fiscal Code (AO), among other things. The retention and documentation periods specified therein range from two to ten years. In special individual cases, the data may be stored for longer, e.g. for the retention of documents to enable or process a possible company pension scheme.

The data and documentation relating to a report within the meaning of the HinSchG will be deleted three years after the conclusion of the proceedings (cf. Section 11 (5) HinSchG). The documentation may be retained for longer in order to comply with the requirements of this Act or other legal provisions, as long as this is necessary and proportionate.

Finally, the storage period is also assessed in accordance with the statutory limitation periods, which, for example, are generally three years in accordance with Sections 195 et seq. of the Civil Code (BGB).

#### 7. IS DATA TRANSFERRED TO A THIRD COUNTRY?

Your data will only be transferred to countries outside the European Economic Area (EEA) (third countries) if and to the extent that this is necessary for the performance of the contractual relationship or required by law (e.g. accounting, administration) or if you have given us your consent.

Insofar as we use software from providers based in third countries or software from providers with subcontractors/service providers in third countries to perform our contractual relationship, your data or parts of your data may be transferred to third countries (e.g. the USA), depending on the purpose of processing.

An adequacy decision within the meaning of Article 45(3) of the GDPR exists for the USA. Personal data from the EU can now be transferred to companies and organisations in the USA that have certified themselves for the EU-U.S. Data Privacy Framework without the need for further protective measures. This adequacy decision thus serves as the basis for data transfers to the service providers we use in the USA.

If there is no adequacy decision within the meaning of Art. 45 (3) GDPR or if the company or organisation in the USA has not certified itself for the EU-U.S. Data Privacy Framework, we conclude standard data protection clauses issued by the EU Commission within the meaning of Art. 46 (2) lit. c GDPR with the respective service providers/suppliers to protect your data. Furthermore, some of our service providers have implemented binding internal data protection regulations (BCR) within the meaning of Art. 47 GDPR for their group of companies or the same group of companies, which have been approved by the respective competent supervisory authority.

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**8. WHAT OTHER DATA PROTECTION RIGHTS DO I HAVE?**

Under the respective legal requirements, you have the right to information (Art. 15 GDPR, Section 34 BDSG), to rectification (Art. 16 GDPR), to erasure (Art. 17 GDPR, § 35 BDSG), to restriction of processing (Art. 18 GDPR), to object (Art. 21 GDPR) and to data portability (Art. 20 GDPR).

You also have the right to lodge a complaint with the competent data protection supervisory authority (Art. 77 GDPR, Section 19 BDSG).

In connection with the notification system, your data protection rights may be restricted as follows:

- **Right to erasure:** This right is restricted if we need data in the future to defend or enforce legal claims (Art. 17(3)(e) GDPR) or if we are subject to a legal obligation to process data (Art. 17(3)(b) GDPR, Section 35(3) BDSG).
- **Right to information:** This is restricted if it would disclose information that must be kept secret according to a legal provision or its nature, in particular due to the overriding legitimate interests of a third party (Section 29 (1) sentence 2 BDSG).

**9. TO WHAT EXTENT IS AUTOMATED DECISION-MAKING USED IN INDIVIDUAL CASES?**

We do not use automated decision-making in accordance with Art. 22 GDPR to establish and implement the employment relationship with you. If we use these procedures in individual cases, we will inform you separately if this is required by law.

**10. TO WHAT EXTENT IS MY DATA USED FOR PROFILING?**

We do not process your data with the aim of evaluating certain personal aspects (so-called "profiling").

**11. AM I OBLIGED TO PROVIDE DATA?**

In the context of employment, we collect certain data that we need to fulfil the contract (e.g. to pay your salary) or that we are legally obliged to collect (e.g. social security data). You are not legally obliged to provide us with personal data. However, if you do not provide us with the data necessary for the conclusion and execution of the contract, as well as the data that we are required to collect and process for legal reasons during and after the conclusion of the contract, it will generally not be possible to execute the employment contract.

**12. WHAT ARE MY RIGHTS TO OBJECT? (ART. 21 GDPR)**

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Art. 6(1)(f) GDPR (data processing based on a balancing of interests); this also applies to profiling based on this provision within the meaning of Art. 4(4) GDPR.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

The objection can be made informally and should be addressed to the contact details given in section 1.

**KAMAT GmbH & Co KG**

As of: March 2026