



Data Privacy Policy for our Employees and Job Applicants

How do we treat your data and what rights do you have?

Information on the collection of personal data pursuant to Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR)

On 25 May 2018, the General Data Protection Regulation (GDPR) will come into force, substantially strengthening the data protection of data subjects in the European Union. As your employer, we have always paid great attention to the security of your personal data.

The GDPR is the most significant data protection legislation in Europe since the EU Data Protection Directive from 1995. Following a two-year transition phase, the GDPR will now replace the outdated EU Data Protection Directive and, to a large extent, also the national data protection legislation of the individual countries. In contrast to a Directive, a Regulation is directly applicable in all the EU Member States without requiring national implementation legislation. This is therefore the first uniform data protection legislation that will apply across all the EU Member States. It lifts the data protection level in the EU Member States and, at the same time, strengthens the rights of data subjects in the same degree as it increases the obligations of enterprises.

1. Who is responsible for data processing and whom can I address?

Responsible for data processing (i.e. the controller) is
EUROGATE GmbH & Co. KGaA, KG
Präsident-Kennedy-Platz 1, Bremen, Germany
Phone: +49 40 7405-2031, Email: compliance@eurogate.eu

The contact details of our data protection officer are as follows:
Jhcon.de, Dipl.-Ing. Jörg Hagen, Veilchenweg 6a, 30989 Gehrden, Germany
Phone: +49 5108 9090112, Email: hagen@jhcon.de

2. What sources and what data do we use?

We process personal data that we have obtained in the scope of our existing employment relationship with you. Usually, this refers to data that we received from you directly during the hiring process. We further process data that are required to smoothly handle our company's business operations with suppliers and customers.

We process the following categories of employee data:



- Contract master data and payment data
- Planning data
- Time recording data
- IT user data
- internal corporate allocation
- recordings from video surveillance cameras.

3. Why do we process your data—purpose of the processing—and what is the legal basis for processing such data?

At EUROGATE GmbH & Co. KGaA, KG, your personal data is processed primarily in connection with human resource management related to your employment at our Company. The legal basis for this type of processing is Art 88 GDPR/Section 26 German Federal Data Protection Act (BDSG). This includes processing of the personal data concerning job applicants.

Moreover, we need only a few of your personal data to perform customer contracts giving us a legitimate interest to process such data that overrides your personal rights. In this context, we use only the name and the business contact details. The legal basis for this type of processing is Art. 6 (1) GDPR.

We have a registered video surveillance system to help us make our procedures safe and to evidence this safety pursuant to the ISPS Code (International Ship and Port Facility Security Code) and pursuant to the national provisions (Port Security Act) and to prevent and be able to document any criminal property damage and theft. This type of data collection is based on Section 4 German Federal Data Protection Act (BDSG).

The company works agreements of EUROGATE GmbH & Co. KGaA, KG are deemed to constitute provisions that allow the processing of personal data pursuant to Art. 6 GDPR and apply to the processing of our employees' individual specific personal data and the associated protective measures. Therefore, special attention must be paid to these agreements.

4. Who receives your data?

We do not forward your data to unauthorised third parties. However, as required, we pass on data in the scope of human resource management and customer contracts to

- public authorities (e.g., social security institutions)
- financial institutions (wage and salary payments)
- contracting partners as suppliers or for customer orders
- external contractors pursuant to Art. 28 GDPR.

5. Are your data transferred to a third country or international organisations?



Transferring your data to third countries or international organisations is not planned in the scope of our business activities.

6. For how long do we store your data?

Your personal data will be erased after expiry of the statutory preservation periods resulting, for instance, from the German Civil Code (BGB), German Commercial Code (HGB), German Code of Social Law (SGB) or the German Fiscal Code (AO).

Data that are not subject to such periods are erased as soon as the purpose for processing such data is no longer valid.

Video surveillance data are erased after a period of seven days.

7. What other data protection rights do you have?

Pursuant to Art. 15 GDPR, you have—vis-à-vis EUROGATE GmbH & Co. KGaA, KG—the right to access personal data concerning you that is processed by us. Furthermore, you have a right to rectification (Art. 16 GDPR), erasure (Art. 17 GDPR) or to restriction of processing (Art. 18 GDPR) and a right to data portability (Art. 20 GDPR).

Moreover, you have the right to lodge a complaint with the competent data protection supervisory authority at any time.

What rights do you have to object?

If you have given consent to your data being processed (pursuant to point (a) of Art. 6 (1) or pursuant to point (a) of Art. 9 (2), you have the right to withdraw your consent at any time. You can further object to your personal data being processed pursuant to Art. 21 GDPR.

If you raise objections, we will no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or we need to process the data for the establishment, exercise or defence of legal claims.

If you have any requests of this type, please contact EUROGATE GmbH & Co. KGaA, KG using the aforementioned address.

Bremen, 24 May 2018

Group Management EUROGATE

signed Thomas Eckelmann
signed Marcel Egger

signed Michael Blach
signed Ulrike Riedel