

Data Privacy Notice

Microsoft

Table of Contents

1. Data Privacy Notice for Microsoft Applications	2
2. Responsible Controller	2
3. Our Data Privacy and Protection Team	2
4. Data Processing by Microsoft.....	3
5. General Note on Usage of Microsoft Products	3
6. Microsoft 365 (Office 365)	3
6.1. Purposes of Data Processing	3
6.2. Types of Data and Categories of Data Subjects	4
7. Microsoft Outlook	4
7.1. Purposes of Data Processing	4
7.2. Types of Data and Categories of Data Subjects	4
8. Microsoft OneDrive	4
8.1. Purposes of Data Processing	4
8.2. Types of Data and Categories of Data Subjects	5
9. Microsoft Teams.....	5
9.1. Teams Functionalities	6
• Meeting Recordings and Transcripts.....	6
• Live Streaming and Broadcasting	6
• Access to Recordings and Transcripts	6
9.2. Purposes of Data Processing	7
9.3. Types of Data and Categories of Data Subjects	7
10. Microsoft Forms	8
10.1. Purposes of Data Processing	8
10.2. Types of Data and Categories of Data Subjects	8
11. Microsoft 365 Copilot.....	8
Note that Microsoft 365 Copilot is not available to all users, and it can be ordered via Matrix42.	8
11.1. Purposes of Data Processing	8
11.2. Types of Data and Categories of Data Subjects	9
11.3. User Access Permissions	9
11.4. Copilot for Microsoft 365 Interaction History	9
11.5. User Activities and Log Files	9
12. Automated Decision-Making.....	10
13. Legal Basis for Data Processing	10
14. Recipients or Categories of Recipients of the Personal Data	10
15. Data Processing and Data Transfer to a Third Country (e.g., outside the European Union).....	10
16. Storing/Erasing Data.....	11
17. Your Rights as a Data Subject.....	11

1. **Data Privacy Notice for Microsoft Applications**

We would like to inform you about the collection and processing of your personal data in connection with the use of Microsoft Applications and about your rights concerning these.

2. **Responsible Controller**

The responsible controller for processing data

Magna International Inc.
337 Magna Drive, Aurora, ON L4G 7K1, Canada
www.magna.com
– hereinafter referred to as “Magna” –

Please note: Microsoft is partially responsible for the data processing. Example: Data processing that occurs as soon as you access the Microsoft Teams website and download the software (Teams app). Microsoft Applications are services of the

Microsoft Corporation
One Microsoft Way Redmond
WA 98052-6399, USA
– hereafter referred to as “Microsoft” –

For more information about Microsoft, see Microsoft’s Data Privacy Policy: <https://privacy.microsoft.com/>

3. **Our Data Privacy and Protection Team**

If you have any questions about data privacy, you can contact our Data Privacy and Protection Team at any time:

Magna International (Germany) GmbH
Attn.: Data Privacy and Protection Team
Kurfürst-Eppstein-Ring 11
63877 Sailauf, Germany
E-Mail: dataprivacy@magna.com

4. Data Processing by Microsoft

Microsoft processes data regarding the usage of their applications for their own business purposes, which include the following: billing and account management; compensation (for example, calculating commissions for employees and partner incentives); internal reporting and modeling (for example, forecasts, sales, capacity planning, product strategy); mitigating fraud, cybercrime, or cyberattacks that could affect Microsoft or Microsoft products; improving core functionalities related to accessibility, data privacy and protection, or energy efficiency; and financial reporting and regulatory compliance. The processing carried out by Microsoft is exclusively for these purposes and expressly not for user profiling, advertising, or similar commercial purposes. Microsoft determines both the means and purposes of data processing for these business-related purposes. In relation to these data processing operations, Microsoft acknowledges sole responsibility for complying with all applicable laws and fulfilling its obligations.

For more information about Microsoft Products, see Microsoft's Data Privacy Page: <https://privacy.microsoft.com/>

5. General Note on Usage of Microsoft Products

We use Microsoft products via multi-factor authentication for processing texts and word documents, communication, and information purposes such as email, chat, online and intranet communication. Additionally, we employ these products to conduct conference calls, online meetings, video conferences, surveys, and inquiries involving our employees, clients, collaborators, service providers, suppliers, customers, and participants. Microsoft productivity and communication products refer to applications, software, and services we utilize and provide to facilitate the creation, storage and sharing of documents, as well as communication with others. The processing of your personal data serves the purpose of providing you with an effective and productive workplace and communication environment. We process the personal data you provide us through your interaction, and we may also process personal data that is necessary for the provision of the respective service. Your personal data will be processed only if permitted or required by law, or if you have given us your consent to do so. We process your personal data solely to the extent necessary to provide functional communication, content, and services. Your personal data will be stored as long as necessary to achieve the purposes for which the data was processed, or as required by applicable retention periods stipulated by law. Should you require information, wish to rectify inaccurate personal data, request data transfer, deletion, restriction, or object to processing, please feel free to contact us at any time to exercise your rights. You can contact our Data Protection Officer and our Data Privacy and Protection Team at any time via e-mail: dataprivacy@magna.com or reach out to the responsible supervisory authority. Please note that some of the aforementioned rights may not be applicable to you depending on the applicable legislation.

For more information about Microsoft Products, please refer to Microsoft's Data Privacy Page: <https://privacy.microsoft.com/>

6. Microsoft 365 (Office 365)

Microsoft 365 (formerly known as Office 365) is a collection of subscription-based productivity services and applications including applications such as Word, Excel, PowerPoint, and Outlook, among others. Microsoft 365 encompasses both client software applications and connected online services, offering web applications available for Microsoft 365 for the web. These services and applications are designed to work across multiple platforms and provide users with numerous interdependent experiences.

6.1. Purposes of Data Processing

The cloud-based Microsoft 365 services offer several functionalities that allow you to utilize your file content for designs and recommendations. They also enable collaboration with others within your documents and provide integration with other Microsoft products, as well as third-party connected products. The processing of your personal data serves the purpose of providing you with an effective and appropriate productive workplace environment.

6.2. Types of Data and Categories of Data Subjects

We process the personal data you provide us through your usage of Microsoft 365. In addition, we may process personal data that is necessary for the provision of the respective services. The relevant categories/types of personal data may include, but are not limited to:

- **User Details:** first name, last name, profile picture (optional), preferred language
- **Contact Data:** (job) title, business address, position, company, e-mail address, phone number
- **Content Data:** text entries, photographs, videos, graphs
- **Metadata:** device information, IP addresses
- **Usage Data:** date and times of document and file creation/saving

For more information about Microsoft 365, please refer to Microsoft's Data Privacy Page: <https://privacy.microsoft.com/>

7. Microsoft Outlook

Microsoft Outlook is an email service provided by Microsoft. It offers email accounts with unique addresses and integrated calendar functionality. Microsoft Outlook client applications are software tools that allow users to manage emails, calendar items, files, contacts, other data from email, file storage, and other services.

7.1. Purposes of Data Processing

Microsoft Outlook provides features that facilitate connections with employees, clients, collaborators, service providers, suppliers, and customers. It also serves the purpose of processing your personal data to ensure an efficient and productive workplace environment.

7.2. Types of Data and Categories of Data Subjects

We process the personal data you provide us through your usage of Microsoft Outlook. In addition, we may process personal data that is necessary for the provision of the respective services. The relevant categories/types of personal data may include, but are not limited to:

- **User Details:** first name, last name, profile picture (optional), preferred language
- **Contact Data:** (job) title, business address, position, company, e-mail address, phone number
- **Content Data:** text entries, photographs, videos, graphs
- **Metadata:** device information, IP addresses
- **Usage Data:** date and times of document and file creation/saving

For more information about Microsoft 365, please refer to Microsoft's Data Privacy Page: <https://privacy.microsoft.com/>

8. Microsoft OneDrive

Microsoft OneDrive is an online storage space in the cloud that is provided to you. With OneDrive, you can securely store your files in the cloud and access and work on them from various devices, such as computers, smartphones, and tablets.

8.1. Purposes of Data Processing

We use Microsoft OneDrive to allow you to store and access your files on virtually any device. You can also share and collaborate on your files with others as part of our use of Microsoft 365. Microsoft OneDrive enables you to share files, collaborate on documents, and sync files to your computer. This also serves the purpose of processing your personal data, to provide you with an efficient and productive workplace environment.

8.2. Types of Data and Categories of Data Subjects

Different types of data are processed when using Microsoft OneDrive. We process the personal data within the files you store on Microsoft OneDrive. In addition, we may process personal data that is necessary for the provision of the respective services. The scope of the data depends on the information you provide before or when using Microsoft OneDrive. The relevant categories/types of personal data may include, but are not limited to:

- **User Details:** first name, last name, profile picture (optional), preferred language
- **Contact Data:** (job) title, business address, position, company, e-mail address, phone number
- **Content Data:** text entries, photographs, videos, graphs
- **Metadata:** device information, IP addresses
- **Usage Data:** date and times of document and file creation/saving

When you store content in Microsoft OneDrive, it inherits the sharing permissions of the folder where it is stored. For example, if you store content in a public folder, the content becomes accessible to anyone who can locate the folder. Conversely, if you store content in a private folder, the content will remain private and restricted to your access only.

When you share your Microsoft OneDrive content via a link, you have the option to set up access authorizations. An email containing the link is sent to the recipients. The link contains an authorization code that allows anyone with the link, depending on the chosen authorization options, to access your content. To change or revoke permissions for your content on Microsoft OneDrive, you can select the specific content and manage the permission levels accordingly. Revoking permissions for a link effectively deactivates the link, meaning that no one will be able to use the link to access the content unless you decide to share the link again.

For more information about Microsoft 365, please refer to Microsoft's Data Privacy Page: <https://privacy.microsoft.com/>

9. **Microsoft Teams**

Microsoft Teams is a collaborative communication and teamwork platform developed by Microsoft. It provides a centralized hub for team collaboration, integrating various features such as chat, video meetings, file sharing, and project management.

You can use Microsoft Teams by accessing the Teams app and entering the respective meeting ID. If applicable, you may also require additional access data for the meeting, which will be provided to you via e-mail from the inviting party. You can invite other participants to online meetings, conference calls, and webinars yourself via the Teams app.

If you prefer not to or cannot use the Teams app, you can access basic functions via the browser version, available on the Microsoft Teams website: <https://www.microsoft.com/en/microsoft-teams/group-chat-software>.

In online meetings, you have the option to participate as a guest without providing your name; you can use a pseudonym instead.

Please note that Microsoft Teams meetings may not be possible on unsupported browsers, which can lead to limitations such as restricted access to the camera, screen content, and microphone. You can learn more about supported browsers here: <https://learn.microsoft.com/en-us/microsoftteams/unsupported-browsers>

9.1. Teams Functionalities

We will log the chat content only if it is necessary for the purposes of logging the outcomes of an online meeting; however, this is typically not required. You also have the option to use pseudonyms when joining an online meeting or enter the meeting room. In the case of webinars, we may process questions asked by webinar participants for the purposes of recording or transcribing and following up on webinars.

When you choose to share your screen, any data and content you share will be made known to us.

- **Meeting Recordings and Transcripts**

If we intend to record or transcribe meetings, the meeting organizer will transparently inform you in advance, explain the reason for recording or transcribing, and ask for your corresponding consent, which you can provide also by activating your camera, or actively participating in the meeting. You can turn off your camera or mute your microphone at any time using the “Microsoft Teams app.”. When a recording or transcript is being made, you will be notified through a clear and explicit indication in the Teams app or web browser view that the recording is in progress.

For those who do not wish for their questions, comments, or video to be captured during a recorded or transcribed meeting, you have the option to turn off your camera and speak at the end of the meeting after the recording or transcription has concluded. If the recording or transcription was conducted throughout the entire duration of the meeting, we suggest reaching out to the meeting organizer to ask your questions or make your comments separately.

The video feeds of those participating in the meeting will be visible in the recordings. Audio recordings (especially questions) from other participants will be audible in the recording or transcribed in the meeting transcript. If you prefer not to be heard or captured by the transcription tool, we ask that you post your questions via chat and mute your microphone.

If you participate in a video conference, you also have the option to apply background effects to blur out your private surroundings, if necessary. You can set this individually during a video conference.

For more information about Microsoft Teams, please refer to Microsoft’s Data Privacy Policy: <https://privacy.microsoft.com/>

Additionally, you can learn about the specific data collected by Microsoft Teams and its purposes here: <https://learn.microsoft.com/en-us/microsoftteams/teams-privacy>

- **Live Streaming and Broadcasting**

Magna uses the Microsoft Teams tool called Microsoft eCDN to facilitate Global Webcasts and other Live Streamed events. When you participate in these meetings, Magna is processing data about your participation in the event. Your information is only visible to the meeting administrators, and it includes your pseudonymized data related to Streaming Media. This data includes Employee Azure ID, View Time, IP Address, Video Experience, Quality of stream, Device Type, Browser, Location, and Content shared by participants in a webcast.

For more information about Microsoft eCDN, please refer Microsoft website: <https://learn.microsoft.com/en-us/ecdn/technical-documentation/analytics>

- **Access to Recordings and Transcripts**

The meeting recording is saved in a folder called “Recordings & Transcripts,” located at the top level of the OneDrive for Business belonging to the person who initiated the recording. All meeting invitees, except for third-party users outside Magna, will automatically receive a personally shared link to access the recording or transcript. Third-party users must be explicitly added to the meeting organizer’s shared list or the shared list of the person who

initiated the recording or transcript. In this context, Microsoft Teams always assigns two permissions for the saved video or text file, distinguishing between the meeting's moderator and its participants. Moderators receive editing permissions for the saved file while participants are granted view-only permission. Guests are not considered in this context and are unable to view the file.

9.2. Purposes of Data Processing

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR) as well as all other applicable Data Privacy laws globally. Our data processing typically serves the following purpose:

- Using Microsoft Teams to hold conference calls, online meetings, video conferences, and/or webinars.
- Recording or transcribing the Microsoft Teams meetings: The meeting may be recorded or transcribed for logging, documentation, and training. The recording or transcribing will be announced before it starts in order to provide you with the option to exit the meeting if desired.

9.3. Types of Data and Categories of Data Subjects

Different types of data are processed when using Microsoft Applications. When all the Microsoft functionalities are in active use, the data of participants in the communication is processed and stored on the servers of the third-party providers used, as required for the communication process.

The scope of the data processed depends on the information you provide before or during your participation in an online meeting. The relevant categories and types of personal data may include, but are not limited to:

- **Categories of Data Subjects:** Participants (internal/external) in the respective Microsoft Teams meeting (conference, meeting, webinar).
- **User Details:** Display name, e-mail address (if provided), profile picture (optional), preferred language.
- **Data Types:** Master data (e.g., title, first and last name, address, position, company), pseudonyms (if used), contact data (e.g., e-mail address, phone number), content data (e.g., text entries, photographs, videos), metadata, and communication data (e.g., device information, IP addresses).
- **Usage Data and Metadata:** Date, time, meeting duration chat messages delivery time, as well as – if applicable – content transfer times (if applicable), communication times during the meeting, meeting ID, phone numbers, location, and IP address.
- **Text, Audio, and Video Data based on your Consent:** You may use chat, question, or poll functions in an online meeting. In this context, the text entries you provide are processed in order to display them in the online meeting and, if necessary, to log them. To enable video display and audio playback, the data from your device's microphone and any video camera it features is processed accordingly for the duration of the meeting.

Encryption: Teams data is encrypted during transmission and when at rest. Microsoft uses standard technologies such as TLS (Transport Layer Security) and SRTP (Secure Real-Time Transport Protocol) to encrypt all data in transit between users' devices and Microsoft data centers, and between Microsoft data centers. This includes messages, files (such as video and audio files), meetings and other content. Dormant company data stored in Microsoft data centers is also encrypted in a way that allows organizations to decrypt content when needed. Teams also use TLS and MTLS (Mutual TLS) to encrypt chat messages. All server-to-server traffic requires MTLS – regardless of whether the traffic is restricted to the internal network or exceeds the internal network perimeter.

You can learn more on how Microsoft Teams encrypts data, here: <https://docs.microsoft.com/de-de/microsoftteams/teams-security-guide>

10. Microsoft Forms

MS Forms is an online survey and form-building tool provided by Microsoft. It is part of the Microsoft Office 365 suite of productivity applications and can be used to create a wide range of forms, surveys, quizzes, and polls for various purposes such as gathering feedback, conducting research, or assessing learning. Services provided by MS Forms include, but are not limited to:

- **Form Creation:** MS Forms provides users with an easy-to-use interface for creating customized forms from scratch or using pre-built templates.
- **Question Types:** MS Forms offers a range of question types, including multiple-choice, text, rating scales, and more, to enable users to create diverse and interactive forms.
- **Sharing and Collaboration:** MS Forms allows users to share their forms with others via email, link, or embedded code, as well as collaborate with colleagues on form creation and data analysis.
- **Data Analysis:** MS Forms provides tools for analyzing and visualizing response data, including charts and graphs, and exporting data to Excel for further analysis.

10.1. **Purposes of Data Processing**

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR) as well as all other applicable Data Privacy laws globally. Our data processing typically serves the following purpose:

- Using Microsoft Forms tool for internal and external surveys, queries, and polls. These include evaluations of actions performed, assessments of product/customer satisfaction, and managing registration for company events, etc.

10.2. **Types of Data and Categories of Data Subjects**

The extent of the data collected and processed by Microsoft Forms varies depending on the type of form or survey being created and the information being collected. Form creators should be mindful of the data they collect and ensure that they have a lawful basis for collecting and processing personal data, as well as comply with applicable Data Privacy laws and regulations. The relevant categories and types of personal data may include, but are not limited to:

- **Categories of Data Subjects:** Participants (internal/external) in the respective survey
- **User Details:** Name, e-mail address organizational details to create and manage user accounts.
- **Data Types:** Master data (e.g., title, first and last name, address, position, company), pseudonyms (if used), contact data (e.g., e-mail address, phone number), response data (e.g., text entries, answers), metadata, and communication data (e.g., device information, IP addresses)
- **Device and Usage Information:** IP address, browser type, and operating system
- **Response based on your Consent:** Response data (any information provided by respondents) are processed, evaluated and, if necessary, stored

11. Microsoft 365 Copilot

Microsoft 365 Copilot is a generative AI tool developed by Microsoft in collaboration with OpenAI. It leverages large language models and connects them to customer business data, including documents, emails, calendar, chats, meetings, contacts, and more. The tool combines this data with the user's working context to provide accurate and relevant responses. Copilot operates within the permissions model of the Magna Microsoft 365 tenant, ensuring compliance and confidentiality. It accesses authorized content for the user through the Semantic Index, following the same data access controls as other Microsoft 365 services. Copilot can be utilized in various Microsoft 365 applications such as Teams, Excel, Word, PowerPoint, Outlook, and OneNote. It does not use customer data to train its models and only displays information that the user has permission to access.

Note that Microsoft 365 Copilot is not available to all users, and it can be ordered via Matrix42.

11.1. **Purposes of Data Processing**

- **Authentication:** To verify the identity of users and ensure secure access to the service.
- **Personalization:** To tailor the AI's responses and suggestions based on the user's interactions and preferences.

- **Service Improvement:** To analyze usage patterns and feedback to enhance the functionality and user experience of Copilot.
- **Compliance:** To adhere to legal and regulatory requirements, such as the General Data Protection Regulation (GDPR).
- **Data Security:** To protect the data against unauthorized access, use, or disclosure.
- **Operational Efficiency:** To facilitate the smooth operation of the service, including troubleshooting, support, and maintenance activities.
- **Job Facilitation:** This purpose aligns with the goal of enhancing the user's ability to perform their job more effectively by leveraging Copilot's AI capabilities. It may include task and decision support, collaboration enhancement, content creation, knowledge management, learning and development, and other.

11.2. Types of Data and Categories of Data Subjects

Microsoft 365 Copilot is designed to access and analyze various types of content, including:

- Contact Data (e.g., Active Directory Data, Office World, Name, Business Email)
- Employee Data (e.g., HR Data, Tasks and Process Steps, Content of Chats and Emails, Contracts, Shared Data and Documents, Calendar Entries)
- Supplier Data (e.g., Content of Chats and Emails, Contracts, Shared Data and Documents)
- Customer Data (e.g., Content of Chats and Emails, Contracts, Shared Data and Documents)
- User generated data (e.g., documents, prompts and completions)
- Data Access Matrix
- User Feedback

By combining this data with the user's specific context and work environment, Copilot can provide accurate and relevant responses to help users effectively navigate their tasks and responsibilities.

Note that Copilot is not continuously processing your data and files. Data processing is triggered when user submits a prompt or otherwise engages with the Copilot functionalities.

11.3. User Access Permissions

Microsoft 365 Copilot uses the permissions system in Magna's Microsoft 365 account to make sure that data access is secure and follows the rules. This means that your data stays confidential and doesn't accidentally move between different users, groups, or accounts. Copilot follows the same rules for data access as other Microsoft 365 services, so you can trust that your information is protected.

11.4. Copilot for Microsoft 365 Interaction History

Copilot interaction history is the record of the prompts and responses that you have with Copilot for Microsoft 365. Examples of Copilot interactions include asking Copilot to help you rewrite a paragraph in a Word document or asking Copilot to generate a to-do list from your notes in OneNote.

You can delete your Copilot interaction history in your account portal. For more information about deleting your Copilot Interaction History, see: <https://support.microsoft.com/en-us/office/delete-your-copilot-for-microsoft-365-interaction-history-76de8afa-5eaf-43b0-bda8-0076d6e0390f>

11.5. User Activities and Log Files

Copilot does not process any log data from user activities. The IT Administration Team relies on log data from Microsoft 365 (adoption data) that indicates which user has Copilot license. The data is being made anonymous and used for monthly statistical evaluations to determine the frequency of use and the number of users.

Note that data pertaining to Copilot licenses is required for troubleshooting purposes. In case you experience an issue while using Copilot, the system administrator may reach out to you to document the error and its solution. If the IT system administrator won't be able to help you, they will log a ticket directly with Microsoft. This will help us to improve the service for the future use.

Microsoft 365 Copilot is not processing Microsoft 365 log data.

You can learn more on how Microsoft 365 Copilot processes your data, see: <https://learn.microsoft.com/en-gb/deployoffice/privacy/microsoft-365-copilot>.

12. Automated Decision-Making

We do not use automated decision-making or profiling (such as within the meaning of Article 22 GDPR, Article 73 PIPL, etc.).

13. Legal Basis for Data Processing

- **Consent-Based Processing:** We may process your data based on your consent in specific cases, such as when you initiate the use of the Teams app, Teams browser version, MS Forms, or the website. This also applies when you voluntarily provide us with unnecessary data for online meetings or responding to the Microsoft forms surveys. Examples of legal basis for such processing include Article 6(1)(a) of the GDPR, Article 13(I) of the PIPL.
- **Employee Data Processing:** When processing employees' personal data, the legal basis is typically the employment contract between Magna and the employee. This is supported by relevant regulations such as Article 88 GDPR in conjunction with the respective applicable national regulations, Article 6(1)(b) GDPR, Article 13(II) PIPL).
- **Contractual Relationships:** For all other data processing, the legal basis when using Microsoft Applications is the contract that exists or is to be initiated between Magna and the third party, insofar as the processing is necessary within the framework of contractual relationships.
- **Legitimate Interest:** In cases where none of the above legal bases apply, data processing when using Microsoft Applications relies on the overriding legitimate interest of Magna, as specified in Article 6(1)(f) of the GDPR. This includes internal usage of Microsoft Teams recordings and transcripts for purposes such as logging, documentation, training, and reporting.

Our legitimate interest is to provide necessary productivity tools to the employees, simplify (internal) communications, handling inquiries, increasing efficiency, and promoting cross-company or cross-site collaboration. We consider the interests of data subjects, and in most cases, they do not outweigh the benefits of introducing and using such services.

14. Recipients or Categories of Recipients of the Personal Data

Personal data processed in connection with the use of the aforementioned Microsoft apps will only be disclosed to those persons and departments who need them to fulfill their tasks related to the purposes mentioned above. During our activities, data is intentionally transferred with meeting participants or those creating surveys. Additionally, we may engage various trusted service providers who will receive personal data. Potential recipients include:

- Affiliated Magna International Inc. companies
- Magna's Global IT Team
- IT and hosting service provider (Microsoft Corporation)
- Telecommunications service providers

Please note that content from online meetings as well as in-person meetings is often specifically intended to communicate information to customers, prospects, or third parties and is therefore intended to be shared.

Microsoft, the provider of the aforementioned apps, may have access to the mentioned data, when necessary, as long as it falls within the scope of our order processing agreement with Microsoft.

15. Data Processing and Data Transfer to a Third Country (e.g., outside the European Union)

We use products from Microsoft for the purpose of data processing and have therefore concluded a data processing agreement with Microsoft involving E.U. Standard Contractual Clauses. It is important to note that data may be transferred to Microsoft Corp. in the United States within this context. Microsoft may also perform remote maintenance access from other third countries. In case where we need to transfer personal data to additional service providers or Magna affiliated companies outside of your jurisdiction, there is a possibility that the level of data privacy in one of the countries may not align with the prevailing

standards in your jurisdiction. However, when such a transfer occurs, we endeavor to do so based on the decisions made by the responsible data protection authorities concerning adequacy or using Standard Contractual Clauses stipulated by the authorities. When using Standard Contractual Clauses stipulated by the authorities, we strive to implement additional measures to protect personal data where necessary. Microsoft is certified under the EU-U.S. Data Privacy Framework based on the EU adequacy decision from July 10th, 2023, which ensures an adequate level of protection for personal data transferred from the EU to the United States.

16. Storing/Erasing Data

Your personal data will be stored in accordance with Magna's Global Record Retention Schedule (MGRRS) and for as long as it is required for the purposes mentioned above. That being stated, personal data may be stored for the period during which claims potentially be asserted against Magna and its affiliated companies. This includes activities related to the performance of contractual services, reviewing, provision and defending warranty claims and, if applicable, guarantee claims.

Your emails, chat messages, video recordings, and transcripts will be deleted after 120 days from their creation or receipt, unless you choose to save these files in a separate folder with a different retention period.

Furthermore, we will store your personal data to meet legal obligations. Corresponding obligations regarding proof and storage arise due to various laws, among other things. In the case of statutory storage obligations, erasure will only be considered after the respective storage obligation has expired.

If a user (or an administrator acting on behalf of the user) chooses to erase their data, Microsoft will ensure the deletion of all copies of their personal data within a 30-day timeframe.

Regarding our specific retention periods, please note the following for different types of data:

Mailing:

- Sent and inbox folder: Your emails will be retained for a period of 120 days.
- Trash folder: Any emails that are moved to the trash folder will be automatically deleted after 2 days.

Teams:

- Personal chat messages (excluding posts in team sites): Your personal chat messages within Teams will be retained for a period of 120 days.
- Recordings: Any recorded meetings or conversations will be retained for a period of 120 days.
- Transcripts (if approved by the Worker Council): If a transcript is generated and approved by the Worker Council, it will be retained for a period of 120 days.

These retention periods ensure that we can comply with legal obligations and also provide a reasonable amount of time for you to access and manage your data.

17. Your Rights as a Data Subject

You may, at any time and free of charge, request from Magna information about your Personal Data stored and the purposes of its use. You also have the right to request correction, deletion or restriction of processing concerning your Personal Data. Regarding Personal Data provided by you, you may exercise your right to data portability.

Additionally, you can withdraw your consent to the processing of your Personal Data with effect for the future at any time free of charge which enjoins Magna from further processing of your Personal Data. To the extent you request deletion or withdraw consent, Magna will delete your Personal Data and take necessary measures to ensure your Personal Data will not be used for any purpose, except as necessary to meet Magna's legal or (pre-)contractual obligations under applicable law.

Additionally, you can withdraw your consent to the processing of your Personal Data at any time, free of charge. This withdrawal prevents Magna from further processing your Personal Data for future purposes.

If you request deletion or withdraw consent, Magna will delete your Personal Data and take necessary measures to ensure it is not used for any purpose, except as required to meet Magna's legal or (pre-)contractual obligations under applicable law.

You have the right to file a complaint with the responsible supervising authority.

This Notice is designed to provide a uniform compliant standard, recognizing that laws in some jurisdictions may impose stricter standards than described in this Notice. In such cases, your Personal Data will be handled in accordance with any applicable local law.

If you wish to exercise the above rights or have any questions regarding the processing of your Personal Data by Magna, please contact Magna's Data Privacy and Protection Team at the following email address: dataprivacy@magna.com