

	EMPLOYEE INFORMATION	Creation date: May 14, 2019
		Last review: May 14, 2019
		Issued by: Corporate
		Last editor: KW
		For: business functions

DATA PROTECTION AND PRIVACY COMMUNICATION FOR EMPLOYEES

Magna International Inc. and its global affiliates, Groups and Divisions (collectively "Magna"), part of the Magna Group of Companies, respect your privacy and are committed to complying with applicable privacy laws in those jurisdictions where the Magna Group of Companies operates, including the EU General Data Protection Regulation (GDPR) to which Magna's European Data Privacy Policy and Procedures, particularly the GDPR Data Subjects' Rights Procedure and GDPR Data Breach Procedure available on MagNET and through your local HR representative, are in accordance with.

Responsibility for the data handling and contact details:

Your Magna employer company and, as the case may be, Magna International Inc. and its affiliate companies (together "Magna controller company") represented by their competent officers.

Data categories to be processed:

We are processing the following categories of personal data, depending on person and position:

- **core data** such as title, name, gender, date of birth, function, reporting line, cost center, staff number, picture (e.g. for company ID card, if applicable);
- **contact details** such as phone number, email address and any other necessary contact information;
- **application / system authentication data** such as user name, login information, IP address;
- **contract data** such as place of work, tasks and other work-related conditions;
- **employment data** such as working time, outage time, inactive time, absence and reasons for absence, salary, possible disabilities, business travel information, clothing size (for work clothing);
- **performance management and apprenticeship data** such as work experience and skills, employee evaluations and target agreements;
- **insurance data** such as periods of insurance, subject matter of the insurance, case of damage and supporting documents e.g. required accident reports, coverage inquiry;
- **bank data** such as account number;
- **procurement data** such as goods or services retained;
- **infrastructure data** such as places accessible / accessed, tools (e.g. fork lifts) / communication (e.g. phone, internet) usable / used etc., directories and organizational charts, **video recordings** to ensure factory safety;
- **incident data** such as Environmental, Health and Safety related information;
- **business-related data** such as information relating to manufacturing or development processes, working documents and content of emails.

How the personal data are obtained:

The personal data Magna processes are (i) obtained, in part, at the commencement of your employment relationship with Magna (e.g. core data and contact details); and (ii) generated through the existing employment relationship (e.g. salary data, information for time tracking and absences, training and business-related data).

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Intentions and legal basis for the data handling:

We process your personal data in accordance with the pertinent data protection regulations

- **to fulfill contractual obligations:**

We process your data for the fulfillment and/or execution of the existing employment contract with you, including time tracking, payroll and handling of benefits, and as required for you to carry out your responsibilities in accordance with Magna's organizational and disciplinary reporting lines. The employment contract also forms the legal basis for data processing for the purposes of business travel, professional interaction internally and with customers or suppliers (including utilization of pictures) and participation in professional (compulsory) events. This also applies to educational and further training opportunities. In addition, data processing takes place based on existing company agreements and other agreements with you, such as bonus or premium agreements or secondment agreements and the associated statutory disclosure obligations for the purpose of obtaining a work permit in the host country. Without this data we cannot carry out the joint contract.

- **to fulfill (other) legal obligations:**

Data processing may be necessary for the purpose of complying with various national, European or supranational laws, legal and/or collective contractual obligations, in particular those relating to applicable labour and social law including the employer's duty of care, laws on employee protection regarding working hours or disability and the employer's right of direction. In addition, statutory reporting and information obligations may exist, such as applicable rights of Employee Representations and statutory retention obligations towards public labour or financial authorities. The latter also include data processing for auditing purposes, such as proof of compliance with proper accounting. Without the provision of your data, we cannot properly comply with our legal obligations.

- **within the scope of your consent:**

In so far no other legal basis applies and if you have given us your consent to process your personal data, processing will only be carried out in accordance with the purposes specified in the declaration of consent to the extent agreed therein. This concerns in particular

- the voluntary provision of photographic material and other personal data for marketing purposes;
- voluntary participation in job-related events;
- the indication of an emergency contact in case of travel activities.

All consents can be revoked independently of each other at any time. Please see "**Your data protection rights**" in detail below.

- **to safeguard legitimate business interests:**

Data processing may be based on justified interests of the employer or third parties, in particular:

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- **to maintain network, data and information security**
Due to the applicable legal data security regulations, some of your data is processed for the administration and security of operational systems, such as the administration of user IDs, the allocation of hardware and software to system users and for the security of the system. This includes automatically created and archived text documents (e.g. professional correspondence) in these matters. Data that are processed by our IT Helpdesk in connection with technical problem-solving and for the purpose of guaranteeing an intact IT risk management as well as data for identity verification (identification requirement at the factory premises) are also recorded. Without this data processing, (information) secure operation and thus employment in our company is not possible.
- **to manage physical infrastructure, tools and working equipment**
Your data is being processed in order to maintain and protect Magna's facilities and offices, for instance through door access controls, and in order to organize and allocate tools and working equipment, including clothes.
- **to manage virtual infrastructure and corporate communication**
Your personal data is being processed in order to provide an efficient and effective working infrastructure, including telephone, internet, email, videoconferencing and chat services. This includes, for international colleagues being able to contact you, your professional contact details, your area of responsibility and a picture published on the intranet, in directories and on organizational charts. This is due to our legitimate interest in unobstructed business operations and in order to promote international communication in across companies or groups. Your personal data is collected when you visit Magna's website or MagNET in order to operate them in the most convenient manner for your use and to protect Magna's IT systems from attacks and other illegal activities. If you provide Magna with further personal data, e.g. within the scope of a registration, a contact form, a survey, a prize competition or for the execution of a contract, Magna uses this data for the purposes mentioned, for the purposes of administration and - if necessary - for the purposes of processing and accounting of business transactions, in each case to the extent required. Finally, your data, including pictures, might be processed for other marketing and social media purposes, internally and externally.
- **to publish professional contact information on the company's website**
For contacting customers and suppliers, professional contact data of employees with external contact is published on the Internet. This is due to our legitimate interest in a smooth business process.
- **for the purpose of necessary administrative activities** such as administration and management of your employment, particularly time tracking, payroll and handling of benefits and business travelling, financial administration for annual budget planning, organizational management, procurement and sales processes, carrying out business such as manufacturing and product development processes etc.
- **to promote the personal development opportunities of the employee**
To enhance the professional skills of employees, personal information is processed in connection with Magna's internal and external training and education programs and related participation registrations.
- **to administer and manage various HR Programs**
including Employee suggestion program and Employee Opinion Survey

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- **to ensure compliance, protect the company's values and to comply with Group principles**

In order to operate successfully and professionally on the market, appropriate professional behavior by employees is required. This includes strict compliance with competition regulations as well as legal and contractual confidentiality obligations to protect business and operational information. For this purpose, Group-wide compliance guidelines to be followed by employees, such as those in the Code of Conduct, were developed. Data processing required in connection with Group-wide programs such as Environment, Health and Safety programs, with organizational instructions (e.g. as part of the onboarding process of employees) and with general control measures like Magna's Hotline or Audit processes.

- **for the purpose of compliance with organizational reporting channels and responsibilities**

The processing of personal data is necessary for employees who hold positions across several companies or Groups in order to fulfil their professional tasks.

- **for quality control**

Personal data may be processed by employees for the purpose of verifiably meeting and maintaining certain company certification standards (e.g. ISO standards, TISAX requirements). This also includes data processing in connection with incident and change management.

- **for the purpose of providing social benefits** such as child minders, canteen etc.

Processing of data based on automated decision making:

Data is not processed on the basis of automated decision making.

Recipients of your personal data:

As the case may be, the data relevant in each individual case is transmitted to the following data controllers and data processors on the aforementioned legal basis:

- authorized individuals of Magna's business, Group Office and Corporate functions, particularly Operations, HR, Finance, Legal, Information Technology, Purchasing, Quality and Sales in Magna International Inc. and affiliated companies;
- external service providers such as payroll accounting, company canteen (external, if applicable) and various IT hosting and maintenance services;
- social insurance institutions and company pension funds;
- law firms and tax advisors;
- offices and authorities such as the tax office, labour market service, labour inspectorate, legal interest groups;
- employee representation (in particular works council and works council fund, if applicable);
- company doctors;
- education and training providers, vocational schools;
- banks involved in the payment to the person concerned or to third parties;
- customers and suppliers;
- funding agencies.

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Data processing outside the EU/EEA:

Depending on your area of responsibility and the required reporting lines to superiors therefor, on the use of Magna-internal and external service providers as well as on the systems used for data processing, data processing may include the transfer of your personal data to affiliated companies of Magna International Inc.

If data is transferred to so-called “third countries” – countries outside the European Economic Area – in which the appropriate level of data protection may not exist, we ensure that such associated companies comply with the relevant applicable data protection regulations. Some of your data may also be processed outside the EU or the EEA. The appropriate level of protection will be sought with reference to the adequacy decision of the European Commission or standard data protection clauses.

Storage time of your data:

We store your data – to the extent necessary – for the duration of your employment and beyond that for the duration of legal storage and documentation obligations in accordance with Magna’s Global Record Retention Schedule, which can be found on MagNET or through your local HR representative. Where there are legitimate reasons for doing so, in particular to enforce or defend legal claims or similar circumstances, your data may be stored for a longer period of time.

Your privacy rights:

You have the right to request **information, correction, deletion or restriction** relating to the processing of your stored data in accordance with the requirements of the GDPR at any time from the Magna controller company. In the case of data processing based on your consent, you have a right of **revocation** against future data processing.

If you believe that we are not compliant in the fulfillment of national or European data protection regulations when processing your data or if you just have any questions about the content of this information sheet or general questions about data protection, you may address your concern to dataprivacy@magna.com and, if a Data Protection Officer has been assigned for the Magna controller company, to dataprotectionofficer@magna.com, or approach your local HR representative.

Any complaints can be addressed to the competent Data Protection Authority.