

Introduction

The protection of your personal data is a matter of great importance to us and a high priority for our company. Adherence to these legal stipulations is a matter of course for us.

The following information provides an overview of how we process your personal data and your rights under Digital Personal Data Protection Act, 2023.

1. Who is responsible for data processing?

Responsible for data processing is Schaeffler India Limited

Schaeffler India Limited
15th Floor, Amar Sadanand Tech Park, Baner
Pune 411 045
India

Tel: +91 20 68198400
E-Mail: info.in@schaeffler.com

You can contact our company's data protection officer at:

Schaeffler AG
Mr. Thomas Biedermann
Data protection officer
Industriestraße 1-3
91074 Herzogenaurach (Germany)

Tel.: +49 9132 82 1476
Fax: +49 9132 82-5901
E-Mail: data-privacy@schaeffler.com

2. For what purpose do we process your data (purpose of processing) and what is the legal basis for this?

We process your personal data in accordance with the terms of the ' Digital Personal Data Protection Act, 2023:

In order to fulfill contractual obligations (Sec. 4 (1)(b) of the DPDP Act, 2023)

Data are processed as part of the implementation of contracts or at your request for the purpose of carrying out pre-contractual measures.

The purpose of data processing is dependent on the respective contract documents and the object of the contract, and is described in the following:

- Contracts in the course of the management of external companies
- Customer contracts
- Supplier contracts

Subject to legal regulations (Sec. 4 (1)(b) of the DPDP Act, 2023)

The processing of your personal data is prescribed in the following legal standard:

- Regulations regarding accident operations

- Regulations regarding air freight certification

As part of the weighing of interests (Sec. 4 (1)(b) of the DPDP Act, 2023)

If necessary, we will process your data for the purpose of protecting our own legitimate interests or those of third parties. Our legitimate interests include the following in particular:

- Ensuring of the domiciliary rights
- Protection against vandalism
- Assertion of legal claims and defense in the event of legal disputes

Justification, implementation, and termination of an employment relationship

Your personal data are used to justify (e.g. as part of the application process), to implement, or to terminate your employment relationship with Schaeffler. This processing can also take place on the basis of a collective agreement.

Due to the current situation, we may process special categories of personal data, if the following conditions are given (e.g., corona virus): (Sec. 7(h) of DPDP Act, 2023)**The fulfillment to the rights and obligations under labour law, social security law and the social protection law**

The processing of your personal data is necessary to enable Schaeffler to carry out the rights arising from labour law and social protection law and to fulfil its obligations in this context.

Health care (Sec. 7(f) & (g) of DPDP Act, 2023)

Your personal data will be processed for the purpose of preventive or occupational medicine, medical diagnosis, treatment or care in the health and social field or for the management of systems and services in the health and social field.

Significant public interest (Sec. 7(h) of DPDP Act, 2023)

The processing of your personal data is necessary for legitimate purposes of a substantial public interest e.g., health data to control highly infectious diseases.

Public interest in the area of public health (Sec. 7(h) of DPDP Act, 2023)

The processing of your personal data is necessary for reasons public interest in the field of public health, such as the protection against serious cross-border threats to health or to ensure high standards of quality and safety of healthcare.

3. What data relating to me will be processed? (Sec. 4 of DPDP Act, 2023)

We will process the following data or data categories relating to you:

- Personnel Data
- Contact details
- Picture and video recordings

4. From what sources do my data originate? (Sec. 7(a) of DPDP Act, 2023)

Basically, we have received your data from you personally and if necessary, in the course of video surveillance of the site enclosure, site entrances and factory site.

5. Who can access my data? (Sec. 7 of DPDP Act, 2023)

Within Schaeffler India Ltd., your data are accessible to those parties who require access to them according to the so-called “Least Privilege” principle (assignment of rights of use in the smallest possible scope) and the need-to-know principle (knowledge of data only when required). Service providers and vicarious agents employed by us may receive data from us for these purposes if this is necessary, it is required by law, you have given your consent, or processors commissioned by us requires that the specifications of the Digital Personal Data Protection Act, 2023 will be observed. Under these prerequisites, recipients of personal data can include the following:

- Company Security of Schaeffler
- Work safety of Schaeffler
- Provider for company security
- Due to the current situation (e.g., corona virus) if necessary, the company health management or governmental authorities

6. Are data transferred to third-party countries or international organizations? (Sec. 4(1) & 16 of DPDP Act, 2023)

The transfer of data to countries outside of India and the EU/EEA (so-called “third-party countries”) only takes place when necessary or legally proscribed, when you have given us your consent, or as part of the processing of an order. If service providers in third-party countries are employed, they are obliged to confirm that they will observe the European level of data security by agreeing in writing to the EU’s standard contractual clauses.

7. How long will my data be stored? (Sec. 8(7) of DPDP Act, 2023)

We will process and store your personal data for as long as this is necessary for the respective purpose. If your data are no longer required, they will be deleted regularly, unless legal obligations to preserve records prevent this deletion. From the date of your visit your data will be stored for duration of 3 years. Furthermore, your picture and video data will be deleted after 7 days.

8. Am I under obligation to provide data? (Sec. 4(1) (b) of DPDP Act, 2023)

As part of the conclusion of contracts, you are obliged to provide such personal data as are necessary to justify, implement, and terminate the contract and fulfill the obligations arising from it, or such personal data as Schaeffler is obliged to record. Without these data, no contracts can be concluded with Schaeffler.

9. What data protection rights do I have? (Sec. 12 of DPDP Act, 2023)

You have the right to the following as per applicable local data protection law:

- Information regarding your personal data that have been processed (Sec. 11 of DPDP Act, 2023)
- Correction of incorrect personal data (Sec. 12(1) of DPDP Act, 2023)
- Deletion of your personal data (Sec. 12(1) of DPDP Act, 2023)
- Restriction of data processing
- Objection according
- Data portability according (Sec. 16(1) of DPDP Act, 2023)

The restrictions specified in Digital Personal Data Protection Act, 2023 apply to the right to information and the right to deletion. You additionally have the right to complain to the Data Protection Board of India for data protection according to Sec. 27 of Digital Personal Data Protection Act, 2023.

10. To what extent are decisions made automatically?

Automated decisions are decisions that are made exclusively by a machine, without evaluation by a natural person. We generally do not use any automated decision-making systems. Should we use such systems in individual cases, we will inform you of this separately provided that this is legally required and if necessary, obtain your prior consent.

11. Does “profiling” take place?

“Profiling” refers to any kind of automated processing of personal data for the purpose of analyzing or predicting the working performance, financial status, health, personal preferences, interests, reliability, conduct, location, or relocation of a natural person. Schaeffler generally does not use “profiling”. Should we use such systems in individual cases, we will inform you of this separately provided that this is legally required and if necessary, obtain your prior consent.