

Data Protection Policy

No.: 21200

Date: 19.02.2021

Version 002

Replaces: Version 001 dated 21.11.2018

Distribution

This document is accessible to and binding for all employees of the HOERBIGER Group via the database "Corporate Rules" on the Group platform connections.hoerbiger.com.

Other applicable documents and files

- a) HOERBIGER Policy on New Systems and Processes - 30502
- b) HOERBIGER Personal Data Breach Policy and Procedure - 21201
- c) HOERBIGER Personal Data Inquiry Procedure - 21202

Documentation

This document and the other associated files will be electronically archived in the HOERBIGER contract database. Invalid versions will be archived after the expiration of their validity for 30 years. Associated files will be archived for 30 years.

Updating

These Rules, including Appendices, shall take effect upon their adoption by the Executive Board. Any amendment to or cancellation of these Rules must be initiated and/or approved by Corporate Audit & Compliance and must be authorized by the Executive Board.

Robert Seeliger Head of Corporate Audit & Compliance HOERBIGER Holding AG	Olaf Werwitzke CFO HOERBIGER Holding AG	Dr. Jürgen Zeschky CEO HOERBIGER Holding AG
Drafted: Vs 1 2018-11-07 Vs 2 2020-12-17	Reviewed: Vs 1 2018-11-21 Vs 2 2021-02-19	Released: Vs 1 2018-11-21 Vs 2 2021-01-16

This Policy applies to every person, both within and outside the HOERBIGER Group, who accesses and processes Personal Data on behalf of HOERBIGER, if and to the extent this processing is within the scope of the EU General Data Protection Regulation. This Policy also specifies the rights of persons whose Personal Data is collected and processed on behalf of HOERBIGER.

Please consult it carefully prior to carrying out any Personal Data processing on behalf of HOERBIGER.

For any clarification or additional information you may need in order to fully understand and accurately implement this Policy, please contact **HOERBIGER Corporate Compliance** at: dataprivacy@hoerbiger.com

1. Purpose and scope of applicability

1.1. Purpose

HOERBIGER is committed to collecting and processing Personal Data responsibly and in compliance with the applicable Data Protection Laws in all countries in which HOERBIGER operates.

This Data Protection Policy is intended to explain how HOERBIGER processes and protects the Personal Data of Data Subjects, as well as to provide rules, principles and guidelines to be followed by those who process such Personal Data on behalf of HOERBIGER, in order to ensure the compliance with applicable Data Protection Laws.

1.2. Scope of applicability

Territories covered by this Policy

HOERBIGER has a worldwide presence, with corporate entities located in various regions including North and South America, Europe, Africa and Asia Pacific. This Policy, however, applies only to processing activities taking place within the scope of the GDPR.

For all data processing activities falling outside of the scope of the GDPR, companies of the HOERBIGER Group will strive to meet GDPR standards as defined herein; to the extent compatible with the locally applicable Data Protection Laws.

The GDPR applies to any data processing activities of HOERBIGER Group companies established in the EU.

The GDPR also applies to companies of the HOERBIGER Group not established in the EU if:

- they are processing Personal Data of data subjects who are in the EU where the processing activities are related to the offering of goods or services to data subjects in the EU, or the monitoring of the behavior of data subjects in the EU as far as their behavior takes place within the EU.
- they are receiving and Processing Personal Data from a company of the HOERBIGER Group or an external company having its seat in the EU.

Each company of the HOERBIGER Group established outside of the EU needs therefore to carefully evaluate on a case by case basis, if certain of their processing activities are within the scope of the GDPR and therefore trigger the applicability of this Policy. If you need any support in this evaluation, please contact HOERBIGER Corporate Compliance.

Data Subjects whose Personal Data must be processed in compliance with this Policy

This Policy applies to the processing of Personal Data of all Data Subjects, whatever their relationship with HOERBIGER, including without limitation, employees, trainees, directors, job and internship applicants, customers/clients, suppliers/vendors, business partners etc.

Covered Persons required to comply with this Policy

This Policy applies to the following Covered Persons:

- persons working at HOERBIGER (including employees, trainees, officers, directors) and processing Personal Data on behalf of HOERBIGER within their functions;
- third parties (including customers/clients, suppliers/vendors, business partners) having access to or receiving Personal Data from HOERBIGER and processing such Personal Data on behalf of HOERBIGER.

2. Terminology and definitions

Data Protection Laws

Any applicable data protection and/or privacy legislation and/or regulations, including the European Union acts (in particular, Directive 95/46/EC dated October 24, 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and Directive 2002/58/EC dated July 12, 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector, as amended, as well as the GDPR).

Data Subject

An identified or identifiable natural person (individual).

EU

The European Union.

Consent

Any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of his/her Personal Data.

Controller

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

Covered Person

Any person and entity processing Personal Data on behalf of HOERBIGER, i.e. both within HOERBIGER (employees, trainees, officers, directors) and outside HOERBIGER (agents, subcontractors, vendors, freelancers, etc.).

GDPR

The EU General Data Protection Regulation adopted in April 2016 and entered into force on May 25th, 2018, as may be amended from time to time.

HOERBIGER

Any company part of the HOERBIGER Group

HOERBIGER Group

All companies being directly or indirectly under the control of HOERBIGER Holding AG

Personal Data

Any information relating to a Data Subject.

Personal Data Breach

Breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

Policy

The present Data Protection Policy as amended and updated from time to time. The version currently accessible on the database "Corporate Rule" on the Group platform connections.hoerbiger.com is considered to be the applicable one.

Processing

Any operation or set of operations which are performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Profiling

Any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviors, location or movements.

Recipient

A Natural or legal person, public authority, agency or another body, to which the Personal Data is disclosed, whether a third party or not.

3. Data Protection Policy

3.1. Principles related to processing of personal data

Any processing of Personal Data on behalf of HOERBIGER must comply with the following principles:

Lawfulness and fairness

Personal Data must be processed lawfully and fairly in relation to the Data Subject.

This implies that the data processing is based on one of the following legitimate grounds:

- the consent given by the Data Subject, or
- the necessity of the processing for (i) preparing and/or performance of a contract with the Data Subject, or (ii) compliance with a legal obligation imposed on HOERBIGER, or (iii) protection of vital interests of the Data Subject or another individual, or (iv) performance of a task carried out in the public interest, or (v) legitimate interests pursued by HOERBIGER or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject, which require protection of Personal Data, in particular where the Data Subject is a child.

When the data processing is implemented on the grounds of the legitimate interest of HOERBIGER, the assessment regarding the balance between HOERBIGER's legitimate interests and the rights of the Data Subject shall be documented.

When the data processing implemented on behalf of HOERBIGER is based on the consent of the Data Subject, the Covered Person shall ensure that HOERBIGER is able to demonstrate such consent. A Data Subject can withdraw his/her consent at any time.

Transparency

Transparency refers, in particular, to the obligation to inform the Data Subject, in an easily accessible form and in a clearly understandable language, about (i) the processing of his/her Personal Data by or on behalf of HOERBIGER, and (ii) his/her rights in relation to such data processing. For more details about the obligation of information, please refer to **section 3.7**.

Purpose limitation

Personal Data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. For more details about the purposes of data processing, please refer to **section 3.2**.

Data minimization

Personal Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. For more details about the Personal Data processed by/on behalf of HOERBIGER, please refer to **section 3.3**.

Accuracy

Personal Data must be accurate and, where necessary, kept up to date. In order to achieve this, Data Subjects have the right to access the Personal Data concerning them and, where necessary, to rectify, complete and update it. For more information about the rights of Data Subjects in relation to their Personal Data, please refer to **section 3.6**.

Storage limitation

Personal Data must be kept no longer than is necessary for the purposes for which such Personal Data was collected and further processed. For more details about data retention periods, please refer to **section 3.8**.

Integrity and confidentiality

Personal Data must be processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures. For more details about security of Personal Data, please refer to **section 3.9**.

3.2. Purposes of Data processing

Personal Data must be collected and processed in accordance with applicable Data Protection Laws and only for limited, explicit and legitimate purposes.

Personal Data may not be used for any purpose that is incompatible with the purpose for which it was initially collected unless the Data Subject concerned provides his/her prior express consent for further use.

HOERBIGER may need to process Personal Data for various purposes, such as:

- administering and managing human resources;
- administering and managing job and internship applications;
- managing commercial relationships with current and potential clients;
- managing commercial relationships with suppliers and vendors, etc.

HOERBIGER endeavors to ensure that its internal governance processes enunciate the reasons behind decisions to use Personal Data for further processing purposes.

Prior to using the Personal Data for a purpose other than the one for which it was initially collected, the Data Subject shall be informed about such new purpose.

3.3. Personal Data processed

Personal Data processed on behalf of HOERBIGER must be limited to the data necessary for carrying out the purpose for which such Personal Data is collected.

No Personal Data can be collected on behalf of HOERBIGER if such collection is prohibited under the applicable Data Protection Laws.

In any case, no Personal Data revealing racial or ethnic origin, political opinions, philosophical beliefs, or concerning sex life shall be collected.

Trade union membership, Personal Data revealing religious belief and health-related Personal Data may only be collected under very limited circumstances as provided by the Data Protection Laws.

Personal Data should be maintained in a manner that ensures it is accurate, complete and up-to-date.

3.4. Recipients of personal Data

Access to Personal Data can only be granted on a need to know basis, and such access shall be limited to the Personal Data that is necessary to perform the function for which such access is granted.

Authorization to access Personal Data shall always be linked to the function, so that no authorization will be extended to access Personal Data on a personal basis.

3.5. Transfer of personal Data outside of the EU

In terms of data processing, the international footprint of HOERBIGER involves a large number of transfers of Personal Data between different corporate entities, as well as towards third parties located in various countries.

This includes transfers of Personal Data from EU Member States to countries outside of the EU considered as not providing adequate legal protection for the processing of personal data.

HOERBIGER endeavors to ensure that appropriate safeguards are implemented to secure such data transfers in conformity with applicable Data Protection Laws.

Prior to any such transfer, each HOERBIGER company is responsible to check on the protection measures in place. For transfers taking place within the frame of the *HOERBIGER Policy on New Systems and Processes* (please refer to **section 3.10** below), Corporate Compliance is authorized to block any such transfer until appropriate safeguards are in place.

3.6. Rights of Data subjects

Data Subjects have certain rights listed in this section, according to applicable Data Protection Laws.

These rights can be exercised by any Data Subject by contacting HOERBIGER Corporate Compliance (please see the relevant contact details in the introduction part of this Policy above), the competent local Data Control Specialist, if any or the competent local Data Protection Officer, if any (please see **Annex 1** to this policy).

Access

Data Subjects are entitled to obtain confirmation from HOERBIGER as to whether or not any Personal Data concerning them is processed by or on behalf of HOERBIGER.

In the affirmative, they have the right to access such Personal Data, to obtain a copy of it free of charge (except for repetitive or excessive requests) and to be provided with a description of main features of the processing implemented in relation to their Personal Data, including (i) purposes of such processing, (ii) categories of Personal Data concerned, (iii) recipients or categories of recipients of Personal Data, (iv) anticipated retention period or, if not possible, the criteria used to determine it, (v) existence of the right to request rectification or erasure of Personal Data, as well as the right to object to or request restriction of processing, (vi) the right to lodge a complaint with a supervisory authority, (vii) information relating to any third party source of Personal Data, and (viii) the existence, the logic involved, the significance and the consequences of any automated decisions.

Where Personal Data is transferred outside of the European Union, Data Subjects shall be informed of the appropriate safeguards relating to such transfer.

Rectification

Data Subjects have the right to obtain from HOERBIGER the rectification of inaccurate, incomplete or outdated Personal Information concerning them.

Erasure (“right to be forgotten”)

Data Subjects have the right to obtain from HOERBIGER the erasure of their Personal Data in one of the following cases:

- such Personal Data is no longer necessary in relation to the purpose(s) for which is was collected or otherwise processed;
- the Data Subject withdraws his/her consent on which the processing was based, and there are no other legal grounds for the processing;
- the Data Subject objects to the processing;
- the Personal Data has been unlawfully processed;
- the Personal Data has to be erased for compliance with a legal obligation.

However, HOERBIGER may refuse the erasure of Personal Data if the processing of such data is necessary for (i) exercising the right of freedom of expression and information, (ii) compliance with a legal obligation or for the performance of a task carried out in the public interest, (iii) reasons of public interest in the area of public health, scientific or historical research purposes or statistical purposes, or (iv) establishment, exercise or defense of legal claims.

Right to restriction

Data Subjects have the right to obtain from HOERBIGER restriction of processing in the following cases:

- where the Data Subject claims inaccuracy of his/her Personal Data processed by HOERBIGER (the restriction being provided for a period enabling HOERBIGER to verify the accuracy);
- where the processing appears unlawful, and the Data Subject opposes erasure and requests the restriction of use of his/her Personal Data instead;
- where HOERBIGER does not need such Personal Data for the purposes of processing, but such Personal Data is required by the Data Subject for the establishment, exercise or defense of legal claims;
- where an objection is raised by the Data Subject in relation to the processing, pending the verification whether the legitimate grounds of HOERBIGER override those of the data subject.

The Data Subject having obtained from HOERBIGER a restriction of processing of his/her Personal Data will be informed by HOERBIGER prior to lifting of such restriction.

Objection

(A) General rule

At any time, the Data Subject has the right to object, on legitimate grounds relating to his or her particular situation, to the processing of his/her Personal Data.

Provided such objection is justified, HOERBIGER will no longer process the Personal Data concerned.

(B) Processing of Personal Data for direct marketing purposes

Without prejudice to the legal requirements applicable to unsolicited commercial communications, where Personal Data is processed on behalf of HOERBIGER for direct marketing purposes, the Data Subject concerned by such data processing has the right, at any time, without providing any reason and free of charge, to opt-out from receiving direct marketing materials and, more generally, to object to the processing of his/her Personal Data for direct marketing purposes, including profiling.

HOERBIGER will endeavor to comply with any such request from a Data Subject who does not wish to receive advertising or marketing materials, and to no longer process his/her Personal Data for direct marketing purposes.

Rights relating to automated individual decisions

The Data Subject has the right not to be subject to a decision based solely on automated processing which significantly affects on such Data Subject or produce legal effects concerning such Data Subject.

However, HOERBIGER may still implement such automated processing if the automated decision is:

- necessary for concluding and performing a contract with the Data Subject or based on the Data Subject's explicit consent; in such cases, HOERBIGER endeavors to implement suitable measures to preserve the Data Subject's rights and interests, including rights (i) to obtain human intervention, (ii) to express his/her point of view and (iii) to contest the automated decision; or
- authorized by the applicable law which also provides for adequate measures to safeguard the Data Subject's legitimate interests.

Data portability

In cases where the data processing is based on the Data Subject's consent or on a contract, and where such processing is carried out by automated means, the Data Subject can request from HOERBIGER (i) to communicate to him/her the Personal Data concerning him/her, in a structured, commonly used and machine-readable format, in order to be able to further transmit such Personal Data to another controller, or (ii) to directly transmit such Personal Data to such other controller, if technically feasible.

However, HOERBIGER can refuse such request if the processing concerned is necessary for the performance of a task carried out in the public interest or if responding to such request risks to adversely affect the rights and freedoms of others.

3.7. Information of the Data Subjects about the processing of their Personal Data and about their rights

HOERBIGER endeavors to provide Data Subjects with specific information concerning both the main features of the data processing and the rights granted to Data Subjects with respect to such data processing, in particular:

- identity and contact details of the HOERBIGER entity that is the data controller,
- contact details of the competent local Data Control Specialist, if any, the competent local Data Protection Officer, if any or of the managing director(s) of the HOERBIGER entity acting as controller,
- purposes and legal basis of such processing,
- any legitimate interests relied upon as the basis of processing,
- recipients or categories of recipients of Personal Data,
- existence of a data transfer outside of the EU and reference to an adequacy decision by the Commission or to the implemented safeguards and the means by which to obtain a copy thereof or otherwise access them,
- retention period of Personal Data or, if not possible, the criteria used to determine it,
- existence of the right of access, rectification and erasure of the Personal Data processed, the right to object to and to require restriction of processing, and the right to data portability,
- if the processing is based on consent, existence of the right to withdraw such consent at any time,
- existence of the right to complain to a supervisory authority,
- any statutory or contractual requirement to provide Personal Data and the consequences of not providing it,
- the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for Data Subjects.

If the Personal Data is obtained indirectly, HOERBIGER shall also provide the Data Subject with information relating to the categories of Personal Data concerned and the source of such Personal Data, including publicly accessible sources.

The information provided to Data Subjects must be concise, transparent and intelligible, in an easily accessible form and must use clear and plain language, particularly where addressed to children.

3.8. Retention of personal data

HOERBIGER endeavors not to retain the Personal Data processed longer than is allowed under the applicable Data Protection Laws and, in any case, not longer than such Personal Data is necessary for the purpose for which it was collected or otherwise processed, subject to applicable retention requirements.

3.9. Security of Personal Data, subcontractors and breach notification

Security measures

HOERBIGER endeavors to implement, or to have implemented by third Covered Persons processing Personal Data on behalf of HOERBIGER, appropriate technical and organizational measures aimed at ensuring an adequate level of security of the Personal Data it processes.

Security measures include, where appropriate, pseudonymisation and encryption of Personal Data, the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems, the ability to restore Personal Data in a timely manner in case of an incident and regular testing and assessment of the effectiveness of the implemented technical and organizational measures.

These measures are intended to prevent the Personal Data processed on behalf of HOERBIGER from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

Third Covered Persons (subcontractors) processing Personal Data on behalf of HOERBIGER

Third Covered Persons must be required, under the terms of the written agreements entered into with HOERBIGER:

- to process the Personal Data only in accordance with the instructions from HOERBIGER;
- to ensure that their personnel who is involved in the processing of Personal Data on behalf of HOERBIGER is bound by a confidentiality obligation;
- to implement appropriate technical and organizational measures to ensure a level of security of Personal Data that is appropriate to the risk;
- not to subcontract the processing without prior written authorization from HOERBIGER and, when subcontracting, to ensure that the relevant agreement provides the same data protection obligations that their agreement with HOERBIGER;
- to assist HOERBIGER in ensuring compliance with Data Protection Laws and makes available to HOERBIGER any information necessary to demonstrate such compliance;
- at the end of the provision of the services, to delete or to return, at the choice of HOERBIGER, the Personal Data processed on behalf of the latter.

Breach notification

HOERBIGER endeavors to report personal data breaches with high risks for the Data Subjects' rights and freedoms to the relevant supervisory authority without undue delay and, where feasible, within 72 hours of becoming aware. It documents any such breach, including the facts relating to it, its effects and the remedial action taken.

Affected Data Subjects shall be notified by HOERBIGER without undue delay of any breach of their Personal Data which implies a high risk for their rights and freedoms.

In case of Personal Data breach, the *HOERBIGER Personal Data Breach Policy and Procedure* must be known and followed by the respective HOERBIGER company(ies) concerned by the data breach. The applicable version is accessible on the database "Corporate Rule" on the Group platform connections.hoerbiger.com.

As part of this Procedure, Covered Persons shall inform the entity's Managing Director(s) and/or the local Data Control Specialist as soon as possible after becoming aware of a Personal Data breach or of any actual or potential vulnerability affecting a data processing implemented on behalf of HOERBIGER.

3.10. Governance mechanisms implemented by HOERBIGER to ensure its compliance with Data protection laws

Data protection impact assessment

Prior to implementing a processing being likely to result in a high risk to the rights and freedoms of Data Subjects (in particular, in case of decision making based on automated processing, potential processing on a large scale of sensitive data or large scale systematic monitoring of a publicly accessible area), HOERBIGER undertakes to, and Covered Persons shall, conduct a data protection impact assessment which notably implies:

- a systematic description of the envisaged processing operations, the purposes of processing and any legitimate interests pursued by HOERBIGER;
- an assessment of the necessity and proportionality of the processing operations in relation to said purposes;
- an assessment of the risks to the rights and freedoms of Data Subjects; and
- the measures envisaged to address such risks, including safeguards, security measures and mechanisms to ensure the protection of Personal Data.

If the data protection impact assessment indicates a high risk resulting from the envisaged processing in the absence of measures taken to mitigate the risk, HOERBIGER shall be informed thereof and will, prior to implementing such processing, consult the competent supervisory authority and take into consideration the analysis and advice provided by the latter.

HOERBIGER Policy on new Systems and Processes

When planning the implementation of new IT system, application and/or business process or the update of an existing system, application or process (whether for the respective entity or globally), the HOERBIGER company(ies) responsible for the project shall ensure that an identification and legal assessment of the Personal Data related aspects is part of the project planning and budgeting.

In each case, *HOERBIGER Policy on new Systems and Processes* and the respective internal procedure, including a pre-check of the Personal Data aspects, shall be followed. The version of this policy and procedure currently accessible on the database "Corporate Rule" on the Group platform connections.hoerbiger.com is considered to be the applicable one.

Record of processing activities

HOERBIGER undertakes to, and Covered Persons shall, maintain a record of processing activities under their responsibility which contains the following information:

- contact details of HOERBIGER and of the relevant local Data Control Specialist (or if none, of the managing director(s));
- purposes of processing;
- categories of Data Subjects, of Personal Data processed and of recipients;
- information relating to any third party international data transfers and any suitable safeguards;
- any anticipated limits for erasure of the different categories of Personal Data;
- general description of any implemented technical and organizational security measures.

Such records shall be made available to the competent supervisory authority on request.

4. Policy Compliance

Monitoring and ensuring compliance of the Personal Data processing implemented at HOERBIGER with this Policy and applicable Data Protection Laws is the responsibility of each Managing Director for the respective HOERBIGER legal entity with the support of HOERBIGER Corporate Compliance and/or the Data Protection Officer, if any.

Any Data Subject may contact HOERBIGER Corporate Compliance, the relevant local Data Control Specialist and/or the competent Data Protection Officer, if any with regard to any issue related to processing of his/her Personal Data and to the exercise of his/her rights as mentioned in **section 3.6** above.

Any Covered Person may contact HOERBIGER Corporate Compliance and/or the relevant local Data Control Specialist with regard to any clarification needed with respect to his/her obligations related to the Personal Data Protection.

Moreover, training session on data protection compliance should be organized by the Managing Directors of each legal entity in order to ensure a better understanding of this Policy and of the data protection requirements resulting from the latter by Covered Persons processing Personal Data on behalf of HOERBIGER.

Within HOERBIGER, any violation of this Policy may result in disciplinary sanctions, subject to applicable law.

5. Related policies and documentation

Further documentation and templates for implementation of the GDPR are available on the community "GDPR@HOERBIGER" on the Group platform connections.hoerbiger.com.

Finally, the text of the EU General Data Privacy Regulation is available on:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679>

ANNEX 1: Data Protection Officers

Data Protection Officer	HOERBIGER companies
it.sec GmbH Managing Director: Holger Heimann Contact: Dr. Bettina Kraft +49 (0) 731 20 589-24 datenschutz@it.sec.de	HOERBIGER Antriebstechnik Holding GmbH HOERBIGER Antriebstechnik GmbH HOERBIGER Automotive Komfortsysteme GmbH HOERBIGER Deutschland Holding GmbH HOERBIGER Elektronik GmbH HOERBIGER Kompressortechnik GmbH HOERBIGER Penzberg GmbH HOERBIGER Service GmbH HOERBIGER SynchronTechnik GmbH HOERBIGER Flow Control GmbH IEP Technologies GmbH HOERBIGER Holding AG INTERHOERBIGER Finanz AG IEP Technologies GmbH (CH) HOERBIGER Wien GmbH

The other companies of the HOERBIGER Group have not appointed a data protection officer.

ANNEX 2: Amendments to the policy – Overview

Version	Type of amendment	Section	Release required
002	Addition of the date of drafting, review and release of the first version	Page 1	No
002	Update of the internal policy: <i>“HOERBIGER Policy for the introduction of IT Systems, Applications and Business Processes”</i> >> reference updated	Page 1 3.5 3.10	No
002	Deletion of a reference to an inexistent section	3.6 – Erasure	No
002	Change of <i>“Data Privacy Coordinator”</i> into <i>“Data Control Specialist”</i>	3.6 3.7 3.9 3.10 4	No
002	DPO company name updated + Managing Director added	Annex 1	No
002	List of HOERBIGER companies updated	Annex 1	No