

Employee Data Privacy Information

D-Link Iberia S.L. (hereinafter also "we" or the "employer") takes the protection of personal data of its employees very seriously. Accordingly, we process personal data in accordance with all data protection requirements, in particular with the EU General Data Protection Regulation (GDPR) and applicable local data privacy laws. With this data protection information, we inform our employees about the collection, storage, processing and use of their personal data ("**data**") within the scope of the employment relationship.

I. Controller and Data Protection Officer

Controller of the personal data is the employer, D-Link Iberia S.L.

Employees can contact the employer with regards to questions about the processing of their personal data via: es-gdpr@dlink.com

Categories of personal data

As the controller, the employer processes data that it receives from employees in the course of its contractual relationship or collects about them in the course of employment itself.

Relevant categories of personal data are

- Master data (first name, last name, date and place of birth, nationality, bank details),
- Contact data (address, private and professional e-mail address and private and professional telephone number),
- Employment data (contractual relationship, term, salary, variable remuneration components, references, certificates, internal training, degrees, CV, application documents, internal evaluations),
- Legitimation data (e.g. ID data for proof of identity and nationality, driver's license if applicable).

Under certain circumstances, we also process special categories of personal data within the meaning of Article 9 GDPR, for example information about religion that is relevant for tax payroll accounting, or data about health in the context of sickness notifications or for other employment and social law matters.

II. Purposes and legitimate basis for the processing

We only process personal data if there is a legitimate basis for such processing.

1. For the fulfillment of the employment contract, Art. 6 (1)(b) GDPR, Art. 9(2)(b) GDPR

The processing of the data is mostly carried out for the fulfillment of the employment contract and all activities required with the operation and administration of the employer. In these cases, the processing is justified according to Art. 6(1)(b) GDPR for the fulfillment of the employment relationship, as far as special categories of personal data are concerned, together with Art. 9 (2)(b) GDPR.

This concerns in particular the following purposes of the processing:

- a) Human resources and personnel management: This includes personnel management activities carried out when recruiting personnel or concluding an employment contract, and includes, among other things, on-boarding, termination of employment, planning and recording of working time, performance, remuneration and fringe benefits, and training.
- b) Execution of business processes and internal administration: This purpose refers to activities such as requesting and approving purchase requests, travel costs and expenses, managing corporate resources, IT services, information security, conducting internal audits and investigations, providing legal or business advice, and preparing for or participating in dispute resolution.
- c) Processing of special categories of personal data (Article 9(2) GDPR): collection of data of the employees on absences due to illness for the purposes of recording illness, processing of information on religion for tax payroll and, where applicable, other information on disabilities for the provision of a safe workplace and the fulfillment of obligations under labor and social law.

2. For the protection of legitimate interests of the employer or third parties, Art. 6 (1)(f) GDPR

Where necessary, the employer processes the data beyond the actual performance of the employment contract in order to protect the legitimate interests of the employer or third parties.

This concerns in particular the following purposes, from which the legitimate interest arises in each case:

- Assertion, exercise and defense of legal claims of the employer,

- Ensuring IT security and IT operations,
- Business management measures,
- Transfer of employee data within the Group and processing by D-Link Corporation for the following purposes:
 - Group-wide human resources management and talent development,
 - Execution and organization of employee transfers between Group companies,
 - Identify and improve synergies between Group companies,
 - Comparability of employee structures and business results of the Group companies in order to identify opportunities for improvement,
 - Supporting Group companies in the organization, collection and storage of personal data.

Employees have the right to object at any time to the above processing of data in accordance with Art 21 GDPR for reasons arising from their particular situation.

3. Due to legal requirements, Art. 6(1)(c)GDPR

This purpose concerns the processing of personal data to enable the company to comply with its legal obligations. The aim is to ensure that the company complies with all applicable laws, for example to prevent crime and disclose personal data to government institutions, courts and supervisory authorities (including tax and labor authorities), insofar as the employer is legally obliged or entitled to such disclosure.

4. Declaration of consent, Art. 6(1)(a) GDPR

Insofar as the employee gives the employer his/her consent to the processing of data for certain purposes, the lawfulness of this processing is given on the basis of the consent. This is the case, for example, in the context of processing for sending congratulations on birthdays and/or company anniversaries. Employees can revoke their consent at any time with effect for the future.

III. Transfer of personal data to third parties

Only such employees have access to data from the employer who need it to fulfill the stated purposes of the processing. Processors appointed by the employer (Art. 28 GDPR)

may also receive data for the aforementioned purposes. In such cases, the employer has ensured by means of a data processing agreement according to Art. 28(3) GDPR that the processing is carried out in compliance with all data protection law requirements. Processors may be companies in the categories of IT services, sales and marketing, logistics, printing services, telecommunications, debt collection, and consulting and advisory services.

Information about employees is only passed on to recipients outside the employer if this is permitted or required by law. Under these conditions, recipients of the data may, for example, be other Group companies, legal advisors or tax consultants.

IV. Third country data transfers

The employer's business processes increasingly cross the borders of individual countries. This form of globalization requires not only the availability of communication and information systems throughout the Group, but also the worldwide processing and use of data within the Group. Accordingly, employee data can be transferred to third countries outside of the EU or the EEA.

In particular, the employer transfers employees' personal data to D-Link Corporation in Taiwan. In the absence of an adequacy decision by the European Commission for Taiwan, it must be assumed that the level of data protection in Taiwan is below the level of data protection in the EU. To safeguard the data transfer to Taiwan, the employer has concluded the standard data protection clauses of the European Commission with D-Link Corporation, as well as implemented other appropriate protection measures of the GDPR.

A further transfer of employee data takes place to the European headquarters in the United Kingdom. At the time of the preparation of this employee information, a level of data protection comparable to the GDPR applies to the United Kingdom. Should this cease to apply in the future as part of the Brexit, the employer will also conclude standard data protection clauses of the European Commission with the European headquarters in the UK in order to further secure the transfer.

Employees can request copies of the concluded standard data protection clauses from the employer at any time using the contact details provided.

V. Data retention

The employer processes personal data as long as it is necessary for the fulfillment of the stated purposes, as long as there is consent for the processing, or as long as the employer is legally entitled or obligated to retain the data. The retention period for employees'

personal data has been defined and documented by the employer in the data retention schedule.

As a rule, the employer processes and stores the data for the duration of the contractual relationship (i.e. including contract initiation and execution as well as subsequent ongoing limitation periods) with the employee. In some cases, the employer also stores and processes the data to fulfill post-contractual obligations and to exercise post-contractual rights beyond the end of the employment relationship.

In addition, the employer is subject to various retention and documentation obligations, which result, among other things, from local tax laws.

VI. **Data subject rights of employees**

Employees have the right of access under Art. 15 GDPR, the right to rectification under Art. 16 GDPR, the right to erasure under Art. 17 GDPR, the right to restriction of processing under Art. 18 GDPR and the right to data portability under Art. 20 GDPR.

Employees can, for example, assert their rights towards the employer via the address given above.

If employees do not agree with the processing of their data, they also have the right to contact a competent data protection supervisory authority.

VII. **Validity and document management**

This document is effective as of May 2021 and is related to the Employee Personal Data Protection Policy.