



ROLLOMATIC DATA PRIVACY

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Rollomatic Internal Privacy Policy & Data Protection Declaration

I. Preamble/ Objective

Rollomatic is a private Swiss company specializing in the design and manufacturing of high-precision CNC machines for cutting tool grinding, cylindrical grinding and laser machining of ultra-hard tools, as well as automation. Its philosophy is based on values such as a passion for high-precision technology, Swiss know-how, a constant quest for quality and an entrepreneurial spirit. The sustainability of Rollomatic's strategy has always been a natural reflex of its governing bodies. Irreproachable conduct contributes directly to the achievement of its objectives, as does respect for Data confidentiality. Rollomatic is committed to respecting Data Privacy within all Rollomatic entities and within the collaboration with its business partners.

In its everyday business operations, Rollomatic therefore is processing a variety of Personal Data. In this regard and with this Policy Rollomatic pursues the following objectives:

- Establishment of a uniform minimum standard to be applied by all Rollomatic companies in Processing Personal Data.
- Providing preventive safeguards against the infringement of personality and privacy rights through the inappropriate Processing of Personal Data.
- Providing an adequate level of protection of Personal Data as required by the Regulation (i.a. the Swiss Data Protection Act and the General Data Protection Regulation of the European Union).
- Providing a transparent information on Personal Data processed by Rollomatic, the way and with which objective these Data are processed by Rollomatic and the rights Data Subjects have with respect to the processing of Data by Rollomatic.

In addition, local data protection and other applicable local laws which provide for mandatory, stricter rules must also be respected. Employees in doubt whether such local laws must be complied with in addition to the rules set out in this Policy, shall contact the Headquarter HR department.

II. Definitions

"Active Processing" shall mean any operation, which goes beyond the reception without request and preservation of a track generated automatically in a computer system.

"Basic Data" shall have the meaning outlined under section VIII below.

"Data" shall mean any information relating to an identified or identifiable natural person.

"Data Subject" shall mean any natural person whose Personal Data are processed by or on behalf of Rollomatic.

"DPA" shall mean the Swiss Data Protection Act as amended from time to time.

"EEA" shall mean the list of countries mentioned in the appendix 1 to the "Ordonnance sur la protection des données") as amended from time to time.

"Employees" shall mean a person working for Rollomatic as employee or in a similar position such as a contractor.

"GDPR" shall mean the General Data Protection Regulation as amended from time to time.

"HR related Data" shall have the meaning outlined under section VIII below.

"Miscellaneous Data" shall have the meaning outlined under section VIII below.

"Passive Data" shall have the meaning outlined under section VIII below.

"Personal Data" shall mean any information that relates to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person. This can be a name, e-mail address, IP-address, a social security number, photographs, etc.

"Policy" shall mean this Rollomatic Privacy Policy and Data Protection Declaration.

"Processing" or "Processed" shall mean any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Regulation" shall mean Swiss Data Protection Act ("DPA") and General Data Protection Regulation ("GDPR"), as amended from time to time.

"Rollomatic" shall mean Rollomatic SA/AG/Ltd and all its subsidiaries as defined under section III below.

III. Scope of Application

This Policy shall apply to Rollomatic SA/AG/Ltd and all its subsidiaries, except subsidiaries that have no commercial contacts with UE Member States or Switzerland. As a matter of principle, these excepted subsidiaries will also comply with this Policy. However, formally these excepted subsidiaries do not fall under the scope of application of this Policy.

This Policy shall also apply to potential data subcontractors processing and storing data on behalf of Rollomatic.

IV. Principles

1. Processing

Rollomatic aims to ensure compliance with the Regulation. The Regulation is built on eight important principles, stipulating that Personal Data must be:

- processed fairly and lawfully;
- obtained only for specific lawful purposes;
- adequate, relevant and not excessive;
- accurate and kept up to date;
- held for not longer than necessary;
- processed in accordance with the rights of the Data Subjects;
- protected in appropriate technical and organisational ways;
- transmitted outside the EEA, only if appropriate measures were put in place.

Employees must process Personal Data in accordance with these principles. In particular Employees will not process Personal Data, unless one of the following conditions is met:

- the Data Subject concerned has consented to such Processing (if the consent is required for such a Processing);
- Rollomatic needs to carry out such Processing (i) to perform, or take steps with view to enter into, a contract with the Data Subject concerned, (ii) to comply with legal obligation of Rollomatic or (iii) to protect the vital interests of the Data Subject concerned in a "life or death" situation; or
- Rollomatic needs to carry out such Processing to pursue Rollomatic's legitimate interests, and those interests are not overridden because the Processing prejudices the interests or fundamental rights and freedoms of the Data Subject concerned.

Rollomatic does not actively process Personal Data. In other words, it does not carry on any commercial activity with such data collection. Personal Data are only collected to support business activity on a need-to-know basis.

Personal Data processed by Rollomatic are divided into the following four categories. These categories are provided for conveniently implementing the guidelines provided by the Regulation:

- **Employee Data and other Data stored in a system such as software (hereinafter "Basic Data")**
Personal Data related to employee records, payroll and social insurance processing and accounting (including ERP system) are processed for HR reasons. In accordance with the Regulation, Processing of employees' Personal Data is not based on an express consent but on the legitimate interest.
- **Data from other people collected in connection with human resources procedures (hereinafter "HR related Data")**
Job applicants' Personal Data collected for recruitment purposes.

- **Data from other persons collected in connection with commercial activities (hereinafter "Miscellaneous data")**

Personal data related to employees of a legal entity (customers) collected within the framework of commercial exchanges. These Data are collected to allow communication between Rollomatic and its customers and to better understand the customers needs related to Rollomatic products and services.

- **Data passively collected (hereinafter "Passive Data")**

Personal Data collected by emails or phone calls by the company and stored without any active processing (email addresses, phone number, etc.).

2. IT Security

Rollomatic's IT Policy enables employees to work in an excellent environment, equipped with the latest technology. Emphasis is placed on perimeter security and Data Protection, by scrupulously controlling access (internal and external), limiting unauthorized program installations and ensuring the resilience and backup of all our systems, to name but a few examples of this IT Policy. In addition, several steps are taken to ensure optimal defense against cybersecurity attacks. Structured training and warnings are regularly provided to employees.

The technical, organizational, and legal measures required to preserve the security and confidentiality of Personal Data are taken in accordance with the risks posed by the processing operations carried out and the sensitive or non-sensitive nature of the Data concerned. We are constantly striving to improve these measures to preserve the security of Personal Data.

3. Guidelines

In order to comply with the Data Protection principles when processing Personal Data, employees shall adhere to the following general guidelines:

- the only people able to access Personal Data should be those who need it for their work;
- Employees shall collect as little Personal Data as possible respectively only Personal Data which is required for Rollomatic's business and compliance with the Regulation and other applicable laws;
- Employees recognise Personal Data with sensitive information, such as someone's race, religion, health, biometric data, etc. This data requires an extra layer of legal protection. Processing of this kind of Personal Data is not permitted. Please contact the Headquarter HR Department to obtain prior approval;
- Personal Data can only be processed based on a lawful reason. Please contact Headquarter HR Department for the specific lawful reason;
- Personal Data should be regularly reviewed and updated if found out of date. If no longer required it should be deleted and disposed of;

- if Personal Data needs to be transmitted to countries outside the EEA or if remote access is granted from countries outside the EEA to Personal Data within the EEA, employees must first contact Headquarter HR Department before conducting such transmissions;
- Personal Data should never be shared informally. When access to confidential information is required Employees should request it from Headquarter HR Department ;
- Personal Data should never be disclosed to unauthorised people. In particular strong passwords must be used and never be shared;
- when sharing information via e-mail or similar methods employees shall ensure that no Personal Data is shared unnecessarily (e.g. using Bcc instead of Cc in order to avoid sharing e-mail addresses with other recipients);
- Personal Data stored on paper, should be locked in a drawer or filing cabinet, it should not be left where unauthorised people could see them, like on a printer. Personal Data print outs should be shredded and disposed of securely when no longer required;
- Employees should in general keep their desks tidy. A tidy desk reduces the possibility of a data leak;
- Personal Data stored electronically are subject to specific directives outlined below under section VIII;
- Employees should request assistance from Headquarter HR Department if unsure about dealings with Personal Data.

V. Cross-Border Data Transfers

Generally, all Personal Data is processed in Switzerland. However, Data can be processed with tools based in other countries within the EEA and can be stored in other EEA countries. Should Personal Data need to be sent to countries abroad and in particular third countries outside the EEA, Rollomatic will implement the EU Standard Contractual Clauses.

VI. Data Breach and Leak

Any 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 constitutes a potential data breach or leak (e.g. Hacking instance, stolen digital files, or printed lists containing Personal Data or loss of a USB stick or another device containing Personal Data).

If such a data breach or leak of Personal Data occurs, Rollomatic is legally obliged to report such to the data protection authority within 72 hours.

Employees who become aware of a data breach or leak are obliged to contact immediately Headquarter HR Department.

VII. Rights of Data Subjects

Data Subjects from whom Personal Data have been processed are to be accordingly informed upon request. In particular, they have a right to be informed of the purposes for which the Personal Data are being processed, the category of data involved and the identity of the recipients of the data. Where appropriate, Data Subjects also have a right to require that Personal Data be corrected, blocked or deleted (including the right to be forgotten); that processing be restricted or to object to such processing and a right to data portability (obtaining a copy of the personal data to re-use with another service or organization). If the employees receive such requests, they shall contact Headquarter HR Department immediately. For more details, please refer to section VIII below.

VIII. Detailed Directives

The following guidelines help to ensure compliance with the principles enacted by the Regulation.

1. Principle of Transparency

According to the Regulation, information and communication relating to Data Processing must be easily accessible, easy to understand and formulated in clear and simple terms. In particular, the person must be informed of the risks, rules, guarantees and rights related to Data Processing. The Regulation also provides to the Data Subject, the guarantee to be informed about the modalities to exercise his rights (identity of the data controller, purpose of the treatment, right to obtain the confirmation and the communication of personal data concerned etc.).

This principle finds application as follows:

- **Basic Data** collected as part of a recruitment process resulting in a commitment, the employment contract provides adequate information as per the Policy;
- **HR related Data** collected as part of an unsuccessful recruitment, this Data are kept for a period of five years and then automatically destroyed. The job applicant is informed when the decision on his postulation is communicated and he can oppose to it. In this case, his Data are deleted without any delay. In addition, it is specified that job applicant's Data are collected only in relation to the position and limited to the useful information to determine the candidate's level of competence. For further information, candidates can find out about the Policy on the Company's website;
- **Miscellaneous Data** include Data collected during the registration of a user to the "Newsletter" of the Company, for a request to Wi-Fi access of the company (in case of visit), for an access to digital tools and portals of the Company such as (but not exclusively) "MyRollomatic" "Digital Rollo World" or "Rollomatic Learning Center". These Miscellaneous Data are only subject to storage to allow a contact with the Data Subject. For more information about Miscellaneous Data, Data Subjects can consult the Policy as well as the Data Management Policy on the website of the Company. It may also be noted, they are informed of the processes when they subscribe to these tools and portals;
- **Passive Data** being not actively processed, no other measures except the general security principle are provided.

2. Deadlines

According to the Regulation, a Data retention period must be defined and limited to the strict minimum.

This principle finds application as follows:

- Retention of **Basic Data** is required by a number of legal provisions and also useful in the interest of employees (e.g. personal data required for social insurances after the employee left the Company). These data are kept without time limit (so called "legitimate interest");
- **HR related Data** are automatically deleted after 5 years;
- As it is not possible for the company to determine whether **Miscellaneous Data** are still useful or relevant (does the person still work for the customer or not?), this type of data is only deleted upon request;
- **Passive Data** being not actively processed, no other measures except the general security principle are provided.

3. Right of Access, right to Rectification and right to be forgotten

The Regulation provides that reasonable steps must be taken to ensure that inaccurate Personal Data are rectified or deleted. Modalities must be provided to facilitate the exercise of the rights conferred.

This principle finds application as follows:

- Each employee has the right to request at no cost access to his **Basic Data** and the right to ask a rectification about his Data. For the reasons mentioned above, an employee cannot ask to have his Personal Data erased;
- Each unsuccessful candidate has the right to access to his **HR related Data** and to request their rectification and erasure, without any charge;
- Each Data Subject whose Data are kept has the right to request at no charge access to his / her **Miscellaneous Data** and to request their rectification, as well as their erasure;
- **Passive Data** being not actively processed, no other measures except the general security principle are provided.

4. Data Portability

According to the Regulation, the Data Subject has a right to transfer at no cost his / her Personal Data in a standard format.

This principle finds application as follows:

- The Company grants this right to all Data Subjects, for **Basic Data, HR related Data and Miscellaneous Data**;

- **Passive Data** being not actively processed, no other measures except the general security principle are provided.

IX. Data Control

The Head of Rollomatic Headquarter HR Department is the Data Processing Responsible. He/she is responsible for the treatment and, alone or jointly with others, determines the purposes and means of the treatment according to the Regulation. For any request, relating to the rights provided by the Regulation, Headquarter HR Department can be contacted under the following email address: legal(at)rollomatic.ch.

According to the GDPR, a representative in the European Union has been designed. Rollomatic has designated BHK Datenschutz und Compliance GmbH in Lörrach (DE) to conduct this role.

A record of Data Processing activities is maintained.

In Switzerland, the possibility is granted to file a claim with the designed Supervisory Authority in case of non-respect Data protection rights. The competent Supervisory Authority is the Federal Data Protection and Information Commissioner.

X. Effective Date

This Policy came into effect on September 1, 2023 and replaces the Internal Directive dated May 22nd, 2018.