



## EU Privacy Policy for Former Employees of MACO Group

### Fulfilment of the duty to provide information in accordance with Art. 12, 13, 14 and 21 GDPR

This document contains information on how your personal data is processed and your related rights under data protection law.

**1. Definition: “former employee”:**

All employees (blue and white collar) whose employment contract has expired.

**2. Definition of “personal data”:**

Personal data within the meaning of Art. 4 (1) GDPR is all data and information relating to an identified or identifiable natural person (hereinafter referred to as “data subject”). This includes name, addresses, contact details, phone number and IP address.

**3. Name and contact details of the controller within the meaning of Art. 4 (7) GDPR:**

The controller is always the MACO Group company with which the employment contract was concluded. The MACO Group companies and their contact details are listed in **Annex ./1**.

**4. Data protection officer contact details:**

The MACO Group companies and their data protection officers are listed in **Annex ./1**.

**5. Processing purposes and legal bases:**

**Processing purposes:**

Your personal data is processed for the purpose of the mandatory issuance of employer's references as well as enquiries regarding heavy labour from the government pension fund.

**Legal bases:**

The legitimacy of the processing of your personal data is based on Art. 6 (1) lit. c) GDPR as the processing is required for fulfilling a legal requirement (issuance of employer's references, enquiries from the government pension fund).

**6. Types and categories of personal data and data subjects:**

**Types and categories of personal data:**

In order to issue **employer's references** once the employment contract has ended, contact details (name, title, address, phone number, personnel number) and data relating to the employment relationship (start date, end date, organisational allocation and/or area of activity, wage or salary and classification) are processed.

For **enquiries from the government pension fund**, time records as well as data relating to the organisational allocation and/or area of activity are processed after the expiry of the employment relationship.

**Data subject categories:** Former employees.



## 7. Recipients or recipient categories:

### Recipients:

We transfer your personal data **within our company** exclusively to departments and persons requiring this data for the fulfilment of the contractual and legal obligations. The data is only transferred to recipients **outside the company** if permitted or required by law, if the transfer is required for processing and therefore fulfilling the contractual relationship and if we have your consent or we are authorised to provide information.

### Recipient categories:

- Authorities,
- Lawyers.

## 8. Transfer to third countries or international organisations:

All of the controllers' and processors' data processing activities are performed in the EU, EEA and/or in countries that have the same level of data protection as the EU and EEA due to adequacy decisions made by the European Commission in accordance with Art. 45 GDPR. Data may only be transferred to third countries in accordance with the special requirements stated in Art. 44 et seq. GDPR .

## 9. Storage and/or archiving period:

We generally only store personal data for as long as necessary to achieve the respective purpose stated above. Retention of data beyond this period could only be necessary for the fulfilment of legal obligations or for the assertion or defence of legal claims. Austria: For the **issuance of employer's references and enquiries from the government pension fund**, we store your data for a period of 30 or 20 years respectively from the end of your employment relationship.

## 10. Rights of the data subject in accordance with the GDPR:

Data subjects have the following rights:

- Right to be informed in accordance with Art. 13 and 14 GDPR,
- Right of access in accordance with Art. 15 GDPR,
- Right to rectification in accordance with Art. 16 GDPR,
- Right to erasure in accordance with Art. 17 GDPR,
- Right to restrict processing in accordance with Art. 18 GDPR,
- Right to data portability in accordance with Art. 20 GDPR,
- Right to withdraw previously issued consent at any time in accordance with Art. 7 (3) GDPR.

To assert these rights, please send an email to the email address of the respective data protection officer (see **Annex ./1**).

**Right to object:** If we process your personal data in order to maintain legitimate interests within the meaning of Art. 6 (1) lit. f GDPR, you have the right, in accordance with **Art. 21 (1) GDPR**, to object to such processing on grounds arising from your specific situation. In accordance with **Art. 21 (2) GDPR**, you can object to the processing of your data for direct advertising purposes at any time.

To assert your right to object, please send an email to the email address of the respective data protection officer (see **Annex ./1**).



**Right to complain:** If you believe that the processing of your personal data violates the GDPR, you have the right, in accordance with Art. 77 GDPR, to complain to the competent regulatory authority. However, before you complain to the regulatory authority, or if you have any questions relating to data protection, please contact the data protection officers listed in **Annex ./1** directly.

**11. Duty to provide personal data:**

Personal data must be provided for issuing mandatory employer's references and/or enquiries from authorities.

**12. Automated decision-making process, including profiling:**

No automated decision-making and profiling processes are applied when processing personal data of former employees.

**13. Intent to process data for other purposes:**

The data is exclusively processed for the above-stated purposes.

**14. Personal data source:**

The personal data is collected directly from the data subject.

As of: October 2023

## Annex ./1

### MACO GROUP companies, data protection officers, regulatory authorities

No.:	MACO Group companies:	Contact details:	Data protection officer:	Regulatory authority:
1.	Mayer & Co Beschläge GmbH, Austria	Mayer & Co Beschläge GmbH Alpenstrasse 173 5020 Salzburg, Austria Tel.: +43 662 6196-0 Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a>	Austrian Data Protection Authority <a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a>
2.	MACO Baubeschlag Produktion & Betriebs GmbH, Austria	MACO Baubeschlag Produktions & Betriebs GmbH Steindorf 67 5570 Mauterndorf im Lungau, Austria Tel.: +43 662 6196-0 Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a>	Austrian Data Protection Authority <a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a>
3.	MACO Produktions GmbH, Austria	MACO Produktions GmbH Industriestrasse 1 8784 Trieben, Austria Tel.: +43 3615 3441-0 Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a>	Austrian Data Protection Authority <a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a>
4.	MyMACO Service GmbH, Austria	myMACO Service GmbH Alpenstrasse 173 5020 Salzburg, Austria Tel.: +43 662 63 60 00 Email: <a href="mailto:service@mymaco.eu">service@mymaco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a> , <a href="http://www.mymaco.eu">www.mymaco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection@maco.eu">dataprotection@maco.eu</a>	Austrian Data Protection Authority <a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a>
5.	MACO HAUTAU Deutschland GmbH, Germany	MACO HAUTAU Deutschland GmbH Haidhof 3 94508 Schöllnach, Germany Tel.: +49 9903 9323-0 Email: <a href="mailto:info@maco-hautau.de">info@maco-hautau.de</a> Website: <a href="http://www.maco-hautau.de">www.maco-hautau.de</a>	Data protection officer Email: <a href="mailto:dataprotection-DE@maco.eu">dataprotection-DE@maco.eu</a>	Federal Commissioner for Data Protection and Freedom of Information <a href="https://www.bfdi.bund.de/">BfDI – homepage (bund.de)</a>

6.	Maico GmbH, Italy	MAICO GmbH Holzländestrasse 15 39015 St. Leonhard in Passeier, Italy Tel.: +39 0473 651200 Email: <a href="mailto:info@maico.com">info@maico.com</a> Website: <a href="http://www.maico.com">www.maico.com</a>	Data protection officer Email: <a href="mailto:dataprotection-IFE@maco.eu">dataprotection-IFE@maco.eu</a>	Italian Data Protection Authority <a href="https://www.gpdp.it/web/guest/home/">https://www.gpdp.it/web/guest/home/</a>
7.	Maco Ferrures Sarl., France	MACO Ferrures SARL 19 Rue des Frères Lumière 67201 Eckbolsheim, France Tel.: +33 3 90 20 28 40 Email: <a href="mailto:maco-ferrures@maco.fr">maco-ferrures@maco.fr</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-IFE@maco.eu">dataprotection-IFE@maco.eu</a>	CNIL - National Commission on Informatics and Liberty <a href="https://www.cnil.fr/">https://www.cnil.fr/</a>
8.	Maco Herrajes, S.L., Spain	Maco Herrajes, S.L., San Sebastian Barrio De Peruri 33 - Oficina 1º D, 48940 Lejona, Vizcaya, Spain Tel.: +34 944 002 533 Email: <a href="mailto:info@maco-herrajes.es">info@maco-herrajes.es</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-IFE@maco.eu">dataprotection-IFE@maco.eu</a>	Spanish Data Protection Authority <a href="https://www.aepd.es/es">https://www.aepd.es/es</a>
9.	Maco Door & Window Hardware Ltd., UK	Maco Door & Window Hardware Ltd. Eurolink Industrial Centre, Castle Road Sittingbourne, Kent, ME10 3LY United Kingdom Tel.: +44 1795 433900 Email: <a href="mailto:enquiry@macouk.net">enquiry@macouk.net</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-UK@maco.eu">dataprotection-UK@maco.eu</a>	Information Commissioner's Office <a href="https://ico.org.uk/">https://ico.org.uk/</a>
10.	Maco Beschläge B.V., Netherlands	Maco Beschläge B.V., Zelhem Stikkenweg 60, 7021BN Zelhem, Netherlands Tel.: +31 314 659700 Email: <a href="mailto:verkoop@maco.eu">verkoop@maco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-NL@maco.eu">dataprotection-NL@maco.eu</a>	Dutch DPA <a href="https://autoriteitpersoonsgegevens.nl/nl">https://autoriteitpersoonsgegevens.nl/nl</a>
11.	TOV MAKO-FURNITURA, Ukraine	TOV MAKO-FURNITURA 21-B Verkhovna Rada Blvd. 02094 Kiev, Ukraine Tel.: +38044 298 20 65 Email: <a href="mailto:ua.office@maco.eu">ua.office@maco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-UA@maco.eu">dataprotection-UA@maco.eu</a>	Ukrainian Parliament Commissioner for Human Rights – Data Protection Office <a href="https://ombudsman.gov.ua/">https://ombudsman.gov.ua/</a>

12.	MACO Ungarn Kft. Hungary	MACO Ungarn Kft. Office address: Szent László u. 15, H-2085 Pilisvörösvár. Warehouse address: Egri u. 26, H-3360 Heves. Tel.: +36207726651 Email: <a href="mailto:Macoungarn@maco.eu">Macoungarn@maco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-ungarn@maco.eu">dataprotection-ungarn@maco.eu</a>	Hungarian National Authority for Data Protection and Freedom of Information <a href="http://www.naih.hu">www.naih.hu</a>
13.	Maco Polska Sp.z.o.o., Poland	Maco Polska Sp.z.o.o. Jana Gutenberga 18 44-109 Gliwice Poland Tel.: +48 (32) 30 12 330 Email: <a href="mailto:info@maco.pl">info@maco.pl</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-PSC@maco.eu">dataprotection-PSC@maco.eu</a>	Personal Data Protection Office <a href="http://www.uodo.gov.pl">www.uodo.gov.pl</a>
14.	Maco Kovanie s.r.o. Slovakia	Maco Kovanie s.r.o. Mostná 62, 949 01 Nitra Slovakia Tel.: + 421 37 6422566 Email: <a href="mailto:cz.office@maco.eu">cz.office@maco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-PSC@maco.eu">dataprotection-PSC@maco.eu</a>	Office for Personal Data Protection of the Slovak Republic <a href="https://dataprotection.gov.sk/uouu/">https://dataprotection.gov.sk/uouu/</a>
15.	Maco Kování s.r.o. Czechia	Maco Kování s.r.o. Turanka 1222/115, 627 00 Brno Czechia Tel.: +420 549 248847 Email: <a href="mailto:cz.office@maco.eu">cz.office@maco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-PSC@maco.eu">dataprotection-PSC@maco.eu</a>	Personal Data Protection Office <a href="http://www.uouu.cz/en/">www.uouu.cz/en/</a>
16.	Maco Obkovi EOOD, Bulgaria	Maco Obkovi EOOD Akad. Ivan Evst., Geschov, Boulevard 104, Office 3, 1612 Sofia Bulgaria Tel.: +43 662 6196-0 Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-BHR@maco.eu">dataprotection-BHR@maco.eu</a>	Commission for Personal Data Protection <a href="http://www.cdpd.bg/en/">www.cdpd.bg/en/</a>
17.	Maco okovi d.o.o. Croatia	Maco okovi d.o.o. Tržna 12, 10290 Zaprešić Croatia Tel.: +385 (0)1 55 15 915 Email: <a href="mailto:hr.office@maco.eu">hr.office@maco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-BHR@maco.eu">dataprotection-BHR@maco.eu</a>	Croatian Personal Data Protection Agency <a href="https://azop.hr/">https://azop.hr/</a>

18.	Maco After Sales s.r.l. Romania	Maco After Sales s.r.l. Piata Montreal nr.10, Cladirea World Trade Center, Intrarea F, et. 1, birou 1.38, campus 46, sector 1 011469 Bucuresti Romania Tel.: +43 662 6196-0 Email: <a href="mailto:maco@maco.eu">maco@maco.eu</a> Website: <a href="http://www.maco.eu">www.maco.eu</a>	Data protection officer Email: <a href="mailto:dataprotection-BHR@maco.eu">dataprotection-BHR@maco.eu</a>	National Supervisory Authority for the Processing of Personal Data <a href="http://www.dataprotection.ro">www.dataprotection.ro</a>
19.	HAUTAU GmbH, Germany	HAUTAU GmbH Wilhelm-Hautau-Strasse 2 31691 Helpsen Germany Tel.: +49 5724 3930 Email: <a href="mailto:info@hautau.de">info@hautau.de</a> Website: <a href="http://www.hautau.de">www.hautau.de</a>	Data protection officer <a href="mailto:Datenschutz@HAUTAU.de">Datenschutz@HAUTAU.de</a>	Federal Commissioner for Data Protection and Freedom of Information <a href="http://BfDI-homepage.bund.de">BfDI - homepage (bund.de)</a>