This privacy notice covers the Learning Management System <u>academy.wagner-group.com</u> (hereinafter referred to as "LMS") provided by J. Wagner GmbH, Otto-Lilienthal-Str. 18, 886777 Markdorf, Germany for use by the individual companies in the WAGNER GROUP.

The following companies belong to the WAGNER GROUP and have access to LMS.

- J. Wagner GmbH, Otto-Lilienthal-Str. 18, 88677 Markdorf, Germany
- Wagner International AG, Industriestraße 22, 9450-Altstätten, Switzerland
- Reinhardt-Technik GmbH, Waldheimstr. 3, 58566 Kierspe, Germany
- Walther Spritz- und Lakiersysteme GmbH, Kärtner Str. 18-30, 42327 Wuppertal, Germany
- •WAGNER S.p.A, Via Santa Vecchia, 109 23868 Valmadrera, Italy
- •WAGNER Spraytech Shanghai, 1th No. 58, Jiangchang San Road, 200436 Shanghai, China
- WAGNER Spraytech US, 1770 Fernbrook Lane, 55447 Plymouth, USA
- IONIQ Skincare GmbH & Co. KG, Otto-Lilienthal-Str. 18, 88677 Markdorf, Germany

J. Wagner GmbH, as a service provider, makes LMS available to the individual companies in the WAGNER GROUP. A standardized approach has been established to apply to all companies in the WAGNER GROUP in order to ensure that a process is in place across the entire group that is compliant with data protection regulations. J. Wagner GmbH values your privacy, the protection of your personal data and the resulting requirement for data security, and has therefore put in place the necessary data protection measures. Personal data will only be collected, processed and used by LMS in accordance with the principles set out as follows, and in accordance with the provisions of the EU General Data Protection Regulation (hereinafter "GDPR") and prevailing data protection legislation.

When you use LMS, various personal data are collected. "Personal data" are any information that refer to an identified or identifiable natural person (hereinafter "Data Subject"). The following privacy notice is intended to inform you about the method, scope and purpose of our collection, processing and use of your personal data.

1. General information on data processing

We only collect, process and use your personal data for the purpose of planning, implementing and evaluating training. The personal data you provide will not be used for any other purpose.

The personal data a user of LMS provides will only be processed after prior consent has been expressly granted by the user.

If you have any questions about data protection in the training process, please refer to the contact information given at the end of this privacy notice.

To register you on the J. Wagner GmbH LMS and to load your user profile, we will collect your contact details, such as your email address, first name, surname, company, product area, and customer number.

You provide us with your email address, first name, surname, company, product area, customer number and learning outcome (pass/fail) following successful registration on LMS for the purposes of storing, assessment, allocation and internal forwarding. Optional input fields will be clearly identified as such.

When you use LMS, your data will only be available to the relevant administrators, sales managers and service employees of the responsible authority of the WAGNER GROUP. Your data will not be disclosed to third parties outside the WAGNER GROUP.

We will not ask you to disclose to us any data that is defined as sensitive personal data under GDPR. If, however, you volunteer such information to us, by doing so you are allowing us to store this information as part of the learning process and to use it for the purposes of the learning process.

Within the LMS registration process, specifically within the profile settings, the sending of notifications about new training courses is enabled. We send this information on the basis of your consent given to J. Wagner GmbH in accordance with Article 6 para. 1 (a) GDPR. The user can at any time withdraw their consent to the processing of their personal data for the purposes of sending information about new training courses. Upon the withdrawal of your consent concerning the notifications, no further processing of your data will be carried out for this purpose. You can end the notifications yourself at any time by writing to academy@wagner-group.com.

For the storage, management and processing of your data, we work with CLICK&LEARN GmbH, Petrinumstraße 12/3, 4040 Linz, Austria, hereinafter referred to as "CLICK&LEARN". CLICK&LEARN hosts LMS on behalf of J. Wagner GmbH, as well as providing ongoing maintenance and ad hoc support. The job processing agreement required under data protection law has been signed with CLICK&LEARN.

2. Retention of data

We store your personal data for as long as is required to achieve the purpose for which it was stored, or for as long as your consent applies. Thereafter, we will delete your data unless the purpose for which they were stored has lapsed and you have agreed to extend the storage period in accordance with Article 6 para.1 section 1. (a) GDPR.

You can also yourself at any time delete the profile data you have provided.

3. Data Subject rights

We draw your attention to the fact that in all matters regarding your registration on LMS and the management of your profile, you have full control of the personal data that you have disclosed to J. Wagner GmbH/a company within the WAGNER GROUP. You can at any time change, correct or delete the data you have provided, as well as your profile.

Right of access and rectification.

You have the right to request from the contact details below, at any time, the information disclosed to us and stored by us about you on LMS. We will not change the data unless you request in writing that we do so, preferably by email to the address given below,

Further information about your other rights as a Data Subject as set out by GDPR can be found in the J. Wagner GmbH general privacy notice at <u>https://www.wagner-group.com</u>. (Data protection)

5. Contact details and statutory information

Please feel free to contact us if you have any questions about data protection and the processing of your data with regard to the learning process. Please direct your questions to the relevant area sales manager named in the prevailing organization matrix. Alternatively, you can direct your question to:

J. Wagner GmbH a Member of WAGNER GROUP

Otto-Lilienthal-Str. 18 88677 Markdorf Germany

PO Box 1120, 88669 Markdorf

E-Mail: academy@wagner-group.com