

## **PRIVACY NOTICE**

The hereby privacy notice is established pursuant in the compliance of the provisions under the Personal Data Protection Law of Nicaragua (the "Personal Data Act") and its Regulation, please consider the terms and conditions given herein, since any contribution of personal data by any means constitutes the acceptance of such terms and conditions and consequently, Draexlmaier Partes Automotrices Nicaragua, S.A., (DRAEXLMAIER) are expressly authorized for the handling of such data.

All undefined terms used with initial capital letter in the hereby notice shall mean the Personal Data Act.

### **Identity and Address of the Responsible.**

The responsible for the handling of the Personal Data is  
Draexlmaier Partes Automotrices Nicaragua, S.A.

### **Purposes of handling Personal Data.**

Data and/or information that has been provided or shall be willingly provided, is confidential. The purposes by which DRAEXLMAIER collects personal data are:

A. Regarding its Employees, to keep an appropriate internal control, of EHS, and security measures, as well as for performing the corresponding payments derived from a work contractual relationship. For safety purposes, DRAEXLMAIER may install surveillance video systems, so therefore, the captured images by such system shall be used to take the required measures in order to guarantee the safety of the persons entering the Company's facilities, as well as evidence of infringements and /or non compliance of the applicable standards and /or existing laws.

In Addition to the above mentioned, DRAEXLMAIER shall be entitled to share its employees personal data with institutions such as banks, finance or microfinance institutions, in order to facilitate the granting of loans and/or credits for its employees.

On the other hand ,the collected personal information shall be used in order to enable DRAEXLMAIER to keep the control of the skills management (e.g., formation, employee development, performance and succession plans ), and to allow subsidiary companies of the Group in other countries to get information about DRAEXLMAIER worldwide employee population, in order to facilitate statistical data used by the Company's Management linked to decision-making purposes, furthermore, personal information shall be used with the purpose to elaborate and distribute newsletters and/or gazettes and /or internal DRAEXLMAIER magazines for the purposes of statistics disclosure and /or related with the labor environment within the Organization.

Regarding potential employees, shall be for purposes of internal control of work interviews schedule, evaluations of performance, contact, and tracking and recruitment.

B. Regarding its suppliers and clients, for purposes of Identification, location, contact, deliveries, payments, collection , statistics, information about services and/or products , quality evaluation, as well as its transmission to third parties by any mean established by law.

Generally, Personal data that DRAEXLMAIER collects from the holders are names, addresses, phone numbers, e-mail addresses and in some cases, general physical health state, curricular reviews bank and tax data.

When collecting Personal data in case that there exist a different handling from the one indicated in this section, DRAEXLMAIER shall notify this to the holder, with the purpose, for the holder to express its consent for the objective implied if required.

### **Safety measures regarding Personal Data.**

The responsibility of the Holder of the personal data is to guarantee that the Data provided to DRAEXLMAIER is true and complete, and shall be liable also to notify DRAEXLMAIER about any modifications for the purpose to comply with the data update obligations.

Draexlmaier will store the personal data so that the holders can access it, also, the data will be canceled if they cease to be useful for the purpose it was originally collected for.

The handling temporality of the Holder's personal data shall depend on the legal agreement held with DRAEXLMAIER, and on the duties required by the current legislation and the competent authorities. At all cases the information shall be stored for a reasonable time.

DRAEXLMAIER has established and is committed to keep the administrative technical and physical safety measures, that enables the protection of personal data collected from any damage, loss, alteration, access or unauthorized treatment.

DRAEXLMAIER will not be liable for any incorrect or false personal data.

### **Means to exercise Rights**

The data Holder will, at any time, exercise the access, rectification, modification, elimination, complementation, addition, and update and or cancellation of the personal data (the Rights) established at the Personal Data Law as well as the protective actions of the personal data that may be entitled to. In order to exercise the rights, according to the provisions of the Personal data Act, The holder may submit a written request addressed to the DRAEXLMAIER Group to the following e-mail address [info@draexlmaier.de](mailto:info@draexlmaier.de) or directly to the DRAEXLMAIER address mentioned above.

The exercise of the Rights request shall contain and accompany the following:

1. - Holders Name and Address or any other mean by which DRAEXLMAIER shall send the respective Request answer;
2. - The documentation that certifies the Holder's Identity or, if required, the legal representation on the requestor's behalf;
3. - The clear and concise description of the personal data from which the holder wishes to exercise any of the access, rectification, cancellation and opposition Rights;
- 4.- In the case of Personal data rectification requests, The holder shall indicate, besides of the early mentioned in this section, the modifications that shall take place and provide the documentation that supports his/her request, and;
5. - Any other element or document which facilitates the location of the corresponding Personal Data.

DRAEXLMAIER shall notify the Holder about the determination adopted, in a term no longer than twenty days, from the date of the receipt of the respective request, with the purposes to make it effective, within the following fifteen days to the communication of the answer date.

The terms mentioned above may be extended just once for an equal period of time as long as the circumstances of the case in question so warrant.

### **Personal Data transfer.**

In case that the holder expresses no opposition against the transfer of his/her Personal data, shall be understood as consent granted for this purpose.

If required, DRAEXLMAIER shall notify the hereby Privacy Notice to the third parties to whom the personal data is transferred and the terms by which the holder subject its handling.

### **Changes or Modification on the Privacy Notice.**

With the hereby Privacy Notice, the information Holders are duly informed about the data collected from them and its purposes, accepting the terms therein contained which were prepared in accordance to the Personal Data protection Act in possession of the individuals.

DRAEXLMAIER reserves the right to perform changes in the hereby Privacy Notice.

Any modification of this Privacy Notice will be published in the following web page: [www.draexlmaier.com](http://www.draexlmaier.com)