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ZKW Korea Privacy Policy

As at: July 2020

ZKW Korea (hereinafter referred to as the 'Company') establishes and publishes the following personal information processing guidelines in order to protect the personal information of the data subject in accordance with Article 30 of the Personal Information Protection Act and to promptly and smoothly deal with complaints related thereto.

Article 1 (Purpose of processing personal information)

The company processes personal information for the following purposes. The personal information being processed will not be used for any purpose other than the following, and if the purpose of use is changed, we will take necessary measures, such as obtaining separate consent in accordance with Article 18 of the Personal Information Protection Act.

1. Customer affairs/provision of goods or services

We process personal information for the purpose of shipping goods, providing services, sending contracts and invoices, providing content, providing personalized services, personal authentication, age verification, payment and settlement, and collection of bonds.

2. Job applications

We will exclusively use the personal data provided by you to comply with your wishes and requests, i.e. to process your job application. In doing so, we will process your personal data for the purpose of carrying out pre-contractual measures.

3. Supplier portal

Upon registration at our Supplier Portal, we will process the personal data provided by you for the purpose of contract performance and to carry out pre-contractual measures for the following purposes: processing of quotations and requests, management and execution of contracts, current customer care and provision of information, management of master data and changes to contract information.

4. Website

We process personal information for the purpose of verification, various notices/notifications, and grievance handling.

Through the whistleblowing portal implemented on our website, we may receive your personal data on the basis of our legitimate interest in solving and preventing criminal offences within our company. The data transmitted to us may include the description of any incident punishable under criminal law, the location where said incident has occurred, the persons or department involved, and other information relating thereto, as well as any data relating to the whistleblower. The data entered will (only) be received by the company concerned (= selected) within the ZKW Group as well as by ZKW Group GmbH (data processing). The unit entrusted with processing any reports is strictly separate from the other corporate units and will exclusively be staffed with employees specifically trained and explicitly responsible for the confidentiality of the data reported.

If you apply on our innovation website "Lighthouse", we process the personal data you provide to carry out pre-contractual measures for the following purposes: internal assessment and examination of your project idea and innovation potential for possible future



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cooperation, contract administration and processing, ongoing support and information, administration of master data and contract data changes.

For this purpose and within the scope of our legitimate interest, we transmit your personal data to Group companies to be involved (in international projects).

5. Lawyers, consultants and other third parties

We shall process your data within the scope of the contract concluded between you as a lawyer, external consultant or other third party and ZKW, for the billing of fees and compliance with obligations to record any services performed, including computer-assisted preparation and archiving of text files (e.g. correspondence) in these matters. Accordingly, this is done for the purpose of contract performance (or, with respect to contact persons in companies, based on legitimate interests).

Article 2 (Processing and retention period of personal information)

① The company processes and retains personal information within the retention and use period of personal information agreed upon when collecting or collecting personal information from the subject.

② Each personal information processing and retention period is as follows:

1. Customer affairs/provision of goods or services: until the completion of supply of goods and services and payment and settlement

However, in the following cases, until the end of the relevant period:

1) Records related to transactions such as labeling, advertising, contract details, and performance in accordance with the Act on Consumer Protection in Electronic Commerce, etc.

- Records on labeling and advertising: 6 months

- Supply records of contract or subscription withdrawal, payment, goods, etc.: 5 years

- Records of handling consumer complaints or disputes: 3 years

2) Storage of communication confirmation data pursuant to Article 41 of the Communication Confidentiality Protection Act

-Subscriber telecommunication date/time, start/end time, counterpart subscriber number, frequency of use, location tracking data of originating base station: 1 year

-Computer communication, internet log records, access tracking data: 3 months

2. Job applications: If you get the job you want, your application documents become part of the personal file. Otherwise, your application documents will be deleted after completion of the application procedure.

3. Supplier portal: For the duration of your registration.

4. Website: Until the business/group homepage is withdrawn

However, in the following cases, until the end of the applicable reasons:

1) In the event of investigations or investigations in violation of relevant laws and regulations, until the investigation ends

2) If the bond and debt relationship remains due to the use of the website, until the settlement of the bond and debt relationship

3) If you applied for a cooperation via our innovation website but received a negative



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decision, your details (profile and application) will be stored for 6 months after completion of the review of a cooperation and deleted afterwards.

4) User data collected through cookies and for the purpose of IT security that we process will be stored for a period of 2 years.

5. Lawyers, consultants and other third parties: until the completion of supply of services and payment and settlement

Article 3 (Provided by a third party of personal information)

① The company processes personal information of the information subject only within the scope specified in Article 1 (the purpose of processing personal information), and personal information such as consent of the information subject, special provisions of the law, etc. Personal information will be provided to third parties only in accordance with Article 17 of the Information Protection Act.

② The company provides personal information to third parties as follows:

ZKW Group-wide supplier database

- Companies that receive personal information:

- ZKW Group GmbH (Rottenhauser Str. 8, 3250 Wieselburg)
- ZKW Lichtsysteme GmbH (Scheibbser Str. 17, 3250 Wieselburg)
- ZKW Elektronik GmbH (Samuel Morse-Strasse 18, 2700 Wr. Neustadt)
- ZKW Slovakia s.r.o. (Bedzianska Cesta 679/375, SK-95631 Krusovce)
- ZKW Mexico S.A. DE C.V. ZKW Mexico Servicios S.A. DE C.V. (Avenida Mineral de Penafiel No. 1 Parque Industrial Santa Fe IV, Puerto Interior, C.P. 36275 Silao, Gto.),
- ZKW Lighting Systems (Dalian) Co Ltd. (Tie Shan Dong San Road, No. 51, CN-116600 Dalian Development Area)
- ZKW Lighting Systems USA, Inc. (100 West Big Beaver Rd. Suite 300, Troy MI 48084, USA)
- KES kabelove a elevtricke Systemy, spol s.r.o. (Popinecka 983/30, CZ-739 32 Vratimov)

- Purpose of use of personal information of recipients: platform for offering services and goods to ZKW

- Personal information items provided: name, phone number, email address, country, username, password

- Retention and use period of the recipient: for the duration of the registration

Article 4 (Consignment of personal information processing)

① The company entrusts personal information processing as follows for smooth personal information processing:

Consignment of personal data processing in Korea

Name of Outsourced Processor	Outsourced tasks
HRM Plus Korea	payroll service, social security contributions, etc.
K.I Health and safety Institute of Technology	compliance with occupational safety and health regulations
Tax Firm With	compliance with tax regulations and deadlines for



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	tax payments
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Consignment of personal data processing overseas

Name of Outsourced Processor and Contact information of privacy officer of the Processor)	Location (Address) of Processor	Items of personal data to be transferred abroad	Purposes of use of personal data by Processor	Date/time and method of data transfer	Period of data retention/use by Processor
Google Cloud https://support.google.com/policies/contact/general_privacy_form?hl=en	Gordon House, Barrow Street Dublin 4 Irland	IP address, cookie, MAC address, service use record, visit record	Website hosting, IT-Security, etc.	Immediate transfer via a designated network; when visiting website	2 years
SAP Privacy officer: Mathias Cellarius privacy@sap.com	Lassallestraße 7b 1021 Wien Austria	Name, phone number, email address, country, username, password	Provision of goods or services	Immediate transfer via a designated network; upon customer's registration in the supplier portal	Until deletion of the supplier profile, or deactivation of the supplier profile after one year of inactivity
ZKW Group GmbH Privacy officer: Stefan Heinrich datenschutz@zkw-group.com	Rottenhauser Straße 8 3250 Wieselburg Austria	Name, date of birth, ID, address, email address, telephone numbers, fax numbers, banking details	For the purpose of proper performance of rights and obligations as shareholder (in particular from a liability and risk perspective, incl. compliance & audit)	Transfer via a designated network in the specific case of a review	As long as to fulfill legal requirements.

② When signing a consignment contract, the company contracts matters related to the responsibilities such as prohibition of processing personal information outside the scope of the purposes of the consignment contract, technical and administrative protection measures, restrictions on re-trust, management/supervision of trustees, and compensation for damages in accordance with Article 25 of the Personal Information Protection Act, etc., and supervise whether the trustee handles personal information safely.



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③ If the contents of the consignment service or the trustee are changed, we will disclose it through this personal information processing policy without delay.

Article 5 (Rights, Obligations and Exercises of Information Subjects)

① Information subjects can exercise the following personal information protection rights to the Company at any time:

1. Request to view personal information
2. Request for correction in case of errors
3. Request to delete
4. Request to stop processing

② The exercise of rights pursuant to Paragraph 1 may be made by writing, telephone, or e-mail to the Company, and the Company will take action without delay.

③ If the information subject requests correction or deletion of personal information errors, the company will not use or provide the personal information until the correction or deletion is completed.

④ The exercise of rights pursuant to paragraph (1) may be made through a legal representative of the data subject or an agent such as a person who has been delegated. In this case, you must submit a power of attorney in accordance with Attached Form No. 11 of the Enforcement Rules of the Personal Information Protection Act.

⑤ The information subject should not infringe the personal information and privacy of the information subject himself or another person being processed by the company in violation of related laws such as the Personal Information Protection Act.

Article 6 (Items of personal information to be processed)

The company handles the following items of personal information:

1. Provision of goods or services

- Required items: name, date of birth, ID, password, address, fax number, phone number, email address, i-pin number, credit card number, bank account information, etc.
- Optional items: Interests, past purchases

2. Job applicants

- Required items: Name, date of birth, gender, ID, address, email address, telephone numbers, CV, training qualifications, formation and further training, job references, etc.

3. Supplier portal

- Required items: name, phone number, email address, country, username, password, etc.

4. Website

In the course of using the Internet service, the following personal information items may be automatically generated and collected.

IP address, cookie, MAC address, service use record, visit record, bad use record, etc.

① Whistleblowing portal

- Required items: country, relationship to ZKW
- Optional items: name, department

② Innovation website "Lighthouse"

- Required items: name, address, email address, country



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5. Lawyers, consultants and other third parties

- Required items: name, date of birth, ID, password, address, fax number, phone number, email address, i-pin number, credit card number, bank account information, etc.

Article 7 (Destruction of personal information)

① The company destroys personal information without delay when personal information becomes unnecessary, such as the elapse of the retention period of personal information and achievement of the purpose of processing.

② In the event that the retention period of personal information agreed by the information subject has elapsed or the purpose of processing has been achieved, if personal information must be kept in accordance with other laws and regulations, the personal information is transferred to a separate database (DB) or the storage location differently preserved.

③ The procedure and method of personal information destruction are as follows:

1. Destruction procedure

The company selects the personal information that caused the reason for destruction, and destroys the personal information with the approval of the company's personal information protection officer.

2. Method of destruction

The company destroys personal information recorded and stored in the form of electronic files using a method such as Low Level Format so that the records cannot be reproduced, and personal information recorded and stored in paper documents is destroyed by shredding or incineration.

Article 8 (Measures to ensure the safety of personal information)

The company takes the following measures to ensure the safety of personal information.

1. Administrative measures: internal management plan establishment, regular employee training, etc.

2. Technical measures: management of access rights of personal information processing system, installation of access control system, encryption of unique identification information, security program installation

3. Physical measures: Access control in computer room, data storage room, etc.

Article 9 (Matters on Installation, Operation and Rejection of Automatic Personal Information Collection Device)

① The Company uses 'cookies' that store and retrieve usage information from time to time to provide personalized service to users.

② Cookies are a small amount of information sent by the server (http) used to operate the website to the user's computer browser and may be stored on the hard disk of the user's PC computer. Purpose of the cookies: It is used to provide optimized information to users by grasping visit and use patterns, popular search terms, secure access status, etc. for each service and websites visited by users.

I. Installation, operation and rejection of cookies: You can refuse to save cookies by setting options in Tools>Internet Options>Privacy menu at the top of the web browser.

You can also mark in the cookie banner which cookies you want to allow.

II. If you refuse to save cookies, you may have difficulty using customized services.

III. We use cookies for technical (Borlabs Cookie) and statistical (Google Analytics) purposes and for external media (Facebook, Google Maps, Twitter and YouTube).



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Article 10 (Personal Information Protection Officer)

① The company is responsible for the handling of personal information, and has designated the person responsible for protecting personal information for the purpose of handling complaints and remedy of information subjects related to personal information processing.

▶ Personal information protection officer

Name: Peter Schuessleder

Position: ZKW Korea Director

Contact: +82 10 8343 4212, office@zkw.kr

※ It leads to the department in charge of personal information protection.

② The information subject can inquire about personal information protection inquiries, complaint handling, and damage relief that occurred while using the company's service (or business) to the person in charge of personal information protection and the department in charge. The company will promptly answer and process information subject's inquiries.

Article 11 (Request for reading personal information)

The data subject requests a request for access to personal information pursuant to Article 35 of the Personal Information Protection Act. You can do it in the departments below. The company will endeavor to promptly process requests for information subject's access to personal information.

▶ Personal information access request and processing department

Name: Peter Schuessleder

Position: ZKW Korea Director

Contact: +82 10 8343 4212, office@zkw.kr

Article 12 (Remedy for Infringement of Rights and Interests)

The information subject can inquire the following organizations for relief, counseling, etc. on infringement of personal information.

The following organizations are separate from the company, so if you are not satisfied with the company's own personal information complaint handling and damage relief results or need more help, please contact them:

▶ Personal Information Infringement Report Center (operated by Korea Internet & Security Agency)

-Jurisdiction: Report on the infringement of personal information and apply for consultation

-Homepage: privacy.kisa.or.kr

-Phone: (without area code) 118

-Address: (58324) Personal Information Infringement Reporting Center, 3F, 9, Jinheung-gil, Naju-si, Jeonnam (301-2, Bitgaram-dong)

▶ Personal Information Dispute Mediation Committee

-Jurisdiction: Personal information dispute settlement application, collective dispute settlement (civil settlement)

-Homepage: www.kopico.go.kr

-Phone: (without area code) 1833-6972

-Address: (03171) 4th floor of the Seoul Government Complex, 209 Sejong-daero, Jongno-



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gu, Seoul

▶ Supreme Prosecutors' Office Cyber Crime Investigation Team: 02-3480-3573
(www.spo.go.kr)

▶ National Police Agency Cyber Safety Bureau: 182 (<http://cyberbureau.police.go.kr>)

Article 13 (Installation and Operation of Image Information Processing Equipment)

① ZKW Korea neither installs nor operates image information processing equipment.

Article 14 (Change of personal information processing policy)

① This personal information processing policy is 2020.07. Applies from July 2020.

② You can check the previous privacy policy below.

- 2020.02. ~ 2020.06. ([Click](#))

- 2019.08. ~ 2020.01. ([Click](#))

Article 15 (Change Register)

- July 2020: ZKW Korea Privacy Policy released