

# COFRA Employee Privacy Statement

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## 1. INTRODUCTION

COFRA Holding AG and its direct or indirect subsidiaries ("COFRA") are committed to handling your Personal data with care and with respect for your privacy. For this purpose COFRA issued this COFRA Employee Privacy Statement ("Privacy Statement").

### When is this Privacy Statement applicable?

This Privacy Statement applies to all COFRA entities in so far as they provide services out of Europe and/or process your personal data if you are situated in Europe. For the avoidance of doubt, the following subsidiaries of COFRA do not fall under the scope of this Privacy Statement: Bregal, Redevco, Sunrock, C&A AG, C&A Brazil, C&A Mexico, Dalsem and Ontario Plants.

This Privacy Statement describes the personal information that COFRA collects from or about you, how we use it and to whom we disclose it.

This Privacy Statement applies to all (former) employees of COFRA and its (former) applicants.

COFRA complies with the privacy legislation in every jurisdiction in which it operates. Each COFRA entity will adhere to this Privacy Statement, unless stricter local regulations require otherwise. If that is the case, you will be informed about it separately.

### What is Personal data?

The following key definitions will help you understand our Privacy Statement:

- **Personal data** means any data that may directly or indirectly identify you.
- **Data subjects** are individuals whose Personal data we will process. As an employee, you are regarded as a data subject in relation to the data processing activities described in this Privacy Statement.

- **Data processing** includes all actions involving the use of your Personal data, including, but not limited to, accessing, obtaining, using, retaining, anonymising and deleting your Personal data. Data processing also includes transferring your Personal data within the COFRA organisation or to third parties outside the COFRA organisation.
- **Data controller** is the entity that determines the means by which your Personal data are processed and the uses to which data are put. Your employer is the Data controller for the processing of your Personal data. Other COFRA entities may also act as Data controller in relation to your Personal data.
- **Data processors** are the external service providers that COFRA may involve to process your Personal data on its behalf. Data processors may process Personal data only in accordance with COFRA's instructions. They may not process Personal data for their own purposes.
- **Sensitive Personal data** is Personal data that relates to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, physical or mental health, sexual orientation and any criminal offence or related proceedings.

Personal data does not include anonymous or non-personal information (i.e. information that cannot be associated with or traced back to a specific individual).

Where relevant, we will have notified the data protection authorities in the jurisdictions in which COFRA operates of the fact that we process your Personal data.

### **Who is responsible for processing your Personal data?**

COFRA is the Data controller regarding the processing of your Personal data. COFRA processes your Personal data only for the purposes that are further explained in this Privacy Statement.

## **2. WHAT PERSONAL DATA DO WE COLLECT?**

We collect and retain different types of Personal data in respect of those individuals who seek to be, are or were employed by us, including the following Personal data or Personal data included in the following documents:

- CVs and/or job applications;
- references and interview notes;
- photographs;
- letters offering or accepting employment;
- mandatory policy acknowledgement sign-off documents;
- payroll information to social insurance bodies;
- information regarding your well-being, development, and performance;
- salary and employee benefit information, including information regarding your pension;

- forms relating to the application for, or in respect of changes to, health benefits;
- emergency contact information.

In addition to the examples listed above, we collect Personal data such as name, home address, phone number, personal email address, date of birth, employee identification number, marital status, data about your partner and/or children, gender, social security number, data regarding education and former employer(s), resident and work permits, religion, absenteeism/leave, data regarding your performance, bank details, medical certificates and any other information necessary for the purposes mentioned in this Privacy Statement.

Where your Personal data is retrieved from a third party, we will inform you thereof as soon as reasonably possible but in any case within one month after receipt, unless this notification is not permitted by applicable law or regulatory requirements.

### 3. WHY DO WE NEED YOUR PERSONAL DATA?

COFRA needs to collect and process your Personal data for a number of reasons and specifically HR-related purposes. Your Personal data is necessary for COFRA to execute your employment agreement or to follow up on your application. If you do not share your Personal data, we will not be able to perform our obligations or tasks as an employer.

Appropriate purposes include:

1. HR and financial/salary administration.
2. Managing and planning the activities of the data subjects and handling personnel affairs, including evaluation, performance review and succession.
3. Communication (internal and external), including providing IT and other communication facilities.
4. Implementing and reviewing employment conditions, including salary and other financial entitlements.
5. Registering presence and absence, including leave and company medical care and welfare work.
6. Training and development.
7. Internal monitoring and company security, including control and security of IT and communication facilities.
8. Dismissal procedures.
9. Handling complaints and legal issues, executing audits, meeting accounting obligations and statutory obligations.
10. Compliance with our obligations and to enable us to exercise our rights and obligations as a (good) employer or as a (good) employee.
11. Considering your application(s) in our hiring processes.

12. Other processing activities which are necessary to comply with legal obligations, for the legitimate interests of COFRA or of a third party (in accordance with Article 6(1)(f) of the GDPR), unless your interests or your fundamental rights and freedoms outweigh those interests.

For the above purposes, your Personal data may also be transferred to other COFRA entities or to third parties such as service providers engaged by COFRA.

### **Processing of Sensitive Personal data**

The Personal data listed above may include Sensitive Personal data. More specifically, COFRA may process Personal data relating to your health, religion (Switzerland only), race and ethnicity, where appropriate and permitted under applicable laws. These Sensitive Personal data will be processed only to the extent necessary for the above purposes. COFRA will be extra vigilant when processing Sensitive Personal data and will always take into account the specific rules and regulations on processing such Sensitive Personal data.

### **Automated decision making**

Your Personal data will always be processed by a human being. COFRA will not take any decisions solely based on automated processing that may affect you personally.

## **4. HOW DO WE PROTECT YOUR PERSONAL DATA?**

We do our utmost to protect your Personal data. To that effect, we use appropriate technical and organisational measures to secure your Personal data, taking into account the latest technological developments. These safeguards are designed to protect your Personal data from loss and unauthorised access, copying, use, modification or disclosure.

Respective measures include ensuring:

- Insight into and oversight of what Personal data is stored and processed, where it is stored and processed and for what purpose(s);
- Access controls so that only those people authorised to access Personal data are actually able to access it;
- Backups of Personal data are protected;
- Personal data is protected by means of encryption whenever Personal data is transported over unsecure and/or public networks.

For more information, please contact [privacy@cofraholding.com](mailto:privacy@cofraholding.com).

## 5. HOW DO WE STORE YOUR PERSONAL DATA?

COFRA may use various systems to collect and store your Personal data, for example Employee Central and SuccessFactors for HR administration and performance management.

We have taken adequate safeguards to ensure the confidentiality and security of your Personal data that we keep. COFRA has, and ensures that any data processors have, implemented appropriate technical, physical and organisational measures to protect Personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, and against all other forms of unlawful processing (including, but not limited to, unnecessary collection).

The retention period for storing Personal data varies depending on the type of Personal data, the purpose for which it was collected, and local laws. We do not store Personal data beyond the retention periods permitted by applicable law.

For more information, please contact [privacy@cofraholding.com](mailto:privacy@cofraholding.com). Employees can also refer to COFRA's Data Retention Policy available on the COFRA intranet.

## 6. WHO HAS ACCESS TO YOUR PERSONAL DATA?

Your Personal data may be accessed only on a need-to-know basis by:

- authorised persons working for and on behalf of COFRA, but only to the extent necessary to fulfil their respective tasks;
- authorised management of COFRA entities;
- third parties required for the performance of your contract, such as insurance companies or pension funds or third-party service providers contracted by COFRA to support COFRA's business processes;
- official authorities if required by law and to the extent necessary to safeguard the rights of COFRA or in case of a health- or safety-related emergency.

If you are applying for a job at COFRA your Personal data will be processed by Greenhouse Software Inc. The retention period of your Personal data will be 4 weeks after submitting your application, or one year if you have provided your explicit consent.

If we grant third-party service providers access to your Personal data, we will make appropriate arrangements to ensure that the protection of your Personal data is at least equal to the security level implemented by COFRA.

Personal data of employees of COFRA entities established in EU member states will not be processed by COFRA entities established outside the European Economic Area (EEA). This will only be permissible if such entities are established in countries that have an adequate level of data protection as decided by the European Commission or sufficient data protection requirements are complied with e.g. the use of standard contractual clauses made available by the European Commission.

## 7. WHAT ARE YOUR RIGHTS?

Regarding the processing of your Personal data, you have the following rights:

- **Right to information and access to Personal data**

This Privacy Statement serves to inform you about all purposes for which your Personal data will be used, who will process your Personal Data and how you can exercise your right to Information with respect to the use of your Personal data. You have the right to request access to your Personal data processed by us at any time. We kindly ask you to specify what Personal data you would like to receive.

- **Right to rectification**

You have the right to have inaccurate or incomplete Personal data corrected and to be informed of the correction. We will also inform the recipients of the data about the adjustments made to any incorrect data, unless such notification is impossible or involves a disproportionate effort.

- **Right to be forgotten**

You have the right to have your Personal data deleted from our records, unless we are obliged or authorized by applicable law or regulation to further process your data.

- **Right to restriction of processing**

You have the right, under certain conditions, to request that the processing of your Personal data is restricted. As a consequence we may not (temporarily) process or change your Personal data. This is the case if you dispute the correctness of your Personal data, if you suggest that your Personal data is no longer necessary for the purpose(s) or if you stipulate that the processing of your Personal data by COFRA is unlawful.

- **Right to object**

You have the right to object to the processing of your Personal data by COFRA if your Personal data is used for purposes other than those necessary for the execution of an agreement or for the compliance with a legal obligation.

- **Right to data portability**

Where permitted by applicable law or regulation you have the right to receive from us the Personal data that you have provided to us, free of charge and in a readable format.

- **Right to withdraw consent**

Where we rely on your consent for the processing of your Personal data, you have the right to withdraw your consent.

- **Right to complain**

If, in your opinion, we do not comply with the provisions of this Privacy Statement, you have the right to submit a complaint with us or with the competent data protection supervisory authority. If you need help establishing which authority is competent, you may contact us at [privacy@cofraholding.com](mailto:privacy@cofraholding.com).

If you wish to exercise your rights, you can contact [privacy@cofraholding.com](mailto:privacy@cofraholding.com). We will respond to your request as soon as possible and ultimately within one month or, in exceptional cases, three months.

## 8. CONTACT

Your Personal data is important to us and it is important that the Personal data in our records is both accurate and up to date. If you require more information on the Personal data records COFRA holds on file, please contact us at [privacy@cofraholding.com](mailto:privacy@cofraholding.com).

If relevant Personal data changes during the course of your employment, e.g. because you move, please inform your HR department immediately.

Should you have any other questions regarding COFRA collecting or processing your Personal data, please contact your HR representative, your Compliance Officer, [privacy@cofraholding.com](mailto:privacy@cofraholding.com) or at the following address:

COFRA Holding AG  
Attention of Data Privacy Team  
Grafenauweg 10  
CH-6300 Zug  
Switzerland

### Changes and updates to this Privacy Statement

We regularly review the Employee Privacy Statement and update it on annual basis or earlier when necessary.

This Privacy Statement was last updated in March 2025