

Ford Motor Company (Austria) GmbH

Data Protection - Privacy Notice

Purpose of this Privacy Notice

1. The purpose of this Privacy Notice is to explain to individuals who work for us how and why we process personal information (which we call “personal data”) about them. We go into more detail in our **Privacy Notice – Supplementary Information** document.
2. This Privacy Notice focuses on information relating to our employees and former employees. It also applies to others who work for us including agency and contract workers. In this Notice, we use the word “you” to refer to anyone within the scope of this notice.

Your obligations in relation to data

3. As stated above, the purpose of this Privacy Notice is for us to give information to you so you understand how and why we process information about you. However, you also have responsibilities in relation to personal data. This might be the case because, due to your work, you have access to personal data relating to others, or you are involved in developing new systems that might contain personal data. These responsibilities include ensuring you, keep personal data safe; report any losses or accidental sharing of data; and take into account legal obligations in relation to data protection if you design Company systems, practices or procedures. Further information regarding this is set out in our **Data Protection – Responsibilities Policy**. It is important that you read and comply with that policy.

What do we mean by ‘personal data’ and ‘processing’?

4. “Personal data” is information relating to you (or from which you may be identified) which is processed electronically or which is (or is intended to be) part of a structured manual filing system.
5. Electronic processing includes processing of personal data on a computer, laptop, mobile phone or similar device. It also includes personal data derived from equipment such as access passes within a building, data on use of vehicles and sound and image data such as CCTV or photographs.
6. “Sensitive personal data” refers to the special categories of personal data which are subject to special protection under data protection laws. These special categories are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership; genetic and biometric data used for the purpose of uniquely identifying a person; and data concerning health, sex life or sexual orientation.
7. “Processing” means doing anything with the data including collecting it, storing it, using it, disclosing it and deleting it.

Personal data – why we process it and what we hold

8. We process personal data for the purposes of our business including management, administrative, employment and legal purposes. Our **Privacy Notice - Supplementary Information** document provides more detail about our purposes for processing personal data, the kind of personal data that may be processed and the grounds on which we process data.

Where does the personal data come from?

9. In relation to employees, some of the personal data that we process will come from you. On recruitment, it may also come from third parties such as previous employers who provide references or a recruitment agency, if used.

10. In relation to agency workers and contractors, personal data will often come from you or from your agency or contractor.
11. We may also process data about you which comes from other sources. Internally, personal data may be derived from managers, HR and other colleagues or automatically, for example, from our IT systems and access cards. It may also be derived from external customers or contacts with whom you communicate by email or other systems.
12. Occasionally we may legitimately request information from you, for example to check if you have the right to work or to process sick pay or family rights (e.g. maternity or paternity leave and pay). If we are not provided with information that we require by law or contract, you may lose benefits or we may decide not to employ you or end your employment (or if not employed by us, we may decide not to have you work for us or to stop you working for us).

Who sees my personal data?

13. Our policy is that only those who have a legitimate need to access your personal information will be able to do so. So, for example, access to personal data relating to you that is stored in your electronic personnel file is limited and can only be seen by relevant HR and IT officers other than in exceptional circumstances e.g. for management purposes or if required by law. Personal data stored elsewhere is likely to be seen only by relevant managers, HR, administrators and others where necessary and appropriate and in line with the purposes set out in our **Privacy Notice - Supplementary Information** document.
14. In some cases personal data may be shared with other entities within the Ford group. This would be in line with the purposes and legal grounds for processing set out in our **Privacy Notice - Supplemental Information** document. For example for workforce or global compensation planning purposes.
15. Personal data may also be provided to third parties if this is consistent with our grounds for processing and doing so is lawful and fair to you. For example we transfer data to organisations such as our payroll service providers; expense management provider, insurers and other benefit providers; our bank; authorities if necessary and organisations that host our IT systems and data. All our third party providers are required to take appropriate security measures to protect personal information in line with our policies and we do not permit them to use your personal data other than for our specified reasons. We may also transfer data to law enforcement agencies, courts, regulators and government authorities if required or appropriate to do so.

Transfers of personal data outside the EEA

16. In connection with our business and for employment, administrative, management and legal purposes, when processing data in line with this Privacy Notice we may transfer your personal data outside the EEA (including to the USA and India). If we transfer your personal information outside the EEA we will put in place appropriate safeguards in accordance with our legal obligations to ensure that your personal data is adequately protected irrespective of the country to which it is transferred. These safeguards may include obtaining contractual assurances from any third party given access to your personal data that your personal data will be protected by standards which are equivalent to those that protect your personal data when it is in the EEA. If you would like to know more about how we protect your personal information when it is transferred outside the EEA, please contact our Data Protection Officer (dpoaut@ford.com).

How long do we keep your data?

17. We do not keep your personal data for longer than is necessary for our purposes. In general, we will keep the personal data stored in your electronic personnel file for the duration of your employment and for a reasonable period thereafter on the basis it may be relevant to our business either as a record or in the event of a legal claim. Other data may be retained for a shorter period (e.g. data stored on laptop hard drives only).

Access to your personal data and other rights

18. If you wish to see any personal data relating to you, we would recommend that you contact HR in the first instance to see if your request can be resolved informally. In relation to agency workers and contractors we recommend that you contact your agency or employing contractor.
19. You also have a legal right to make a “subject access request”. If you exercise this right and we hold personal data about you, we are required to provide you with certain information about it, including:
- Giving you a description and copy of the personal data; and
 - Telling you why we are processing it.
20. If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.
21. As well as your subject access right, you have other legal rights which, in certain circumstances allow you to have your personal data rectified or erased, to object to its processing or to have its processing restricted. You may also be able to request the transfer of certain data to another party. If you wish to know more about these rights or wish to exercise them please contact our Data Protection Officer (dpoaut@ford.com).

Contacting us

22. If you have any queries regarding this notice, then in the first instance we recommend you contact your local HR department.
23. In processing your personal data, we act as a data controller. Our contact details are as follows: Ford Motor Company (Austria) GmbH, Hackinger Strasse 5c, 1140 Wien, HR Manager.
24. Also, we have appointed a Data Protection Officer whose role includes informing and advising us and those who are involved in processing data of their obligations under data protection laws. The contact details of the data protection officer are dpoaut@ford.com.
25. If you have any complaints relating to our processing of your personal data, you should raise these with your local HR department in the first instance or with our Data Protection Officer. In relation to agency workers and contractors we recommend that you contact your agency or employing contractor. You may also raise complaints with your national supervisory authority. In Austria: Österreichische Datenschutzbehörde under www.dsb.gv.at/kontakt.

Status of this Privacy Notice

This Notice does not form part of your contract of employment and does not create contractual rights or obligations. It may be amended by us at any time.

Ford Motor Company (Austria) GmbH Data Protection - Privacy Notice Supplemental Information

Purpose of this Privacy Notice – Supplemental Information

1. The purpose of this document is to provide supplemental information in relation to our **Data Protection - Privacy Notice**. The purpose of that Privacy Notice is to explain to individuals who work for us how and why we process personal information (which we call “personal data”) about them. The Privacy Notice should be read together with this document.

What are the legal grounds for processing?

2. Under data privacy laws, we are allowed to process data only if we can rely on one or more of the legal grounds for processing. The legal grounds we are most likely to rely on for processing data in relation to you are outlined in the following table.

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, to comply with our PAY obligations or to ensure employees are authorized to drive
Legitimate Interests	Processing necessary for our or a third party's legitimate interests	We, or a third party, have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data. Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.
Consent	You have given specific consent to processing your data	In general processing of your data in connection with employment is not conditional on your consent. But there may be occasions where we do specific things such as deduct union dues or obtain a medical reports and rely on your consent to our doing so. If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.
Vital interests	Where processing is needed to protect your vital interests (or someone else's interests) and you are not capable of giving your consent	This is only likely to apply in very exceptional circumstances such as in a medical emergency.

3. We will only process sensitive personal data about you if one or more of the grounds for processing sensitive personal data applies. The legal grounds we are most likely to rely on for processing sensitive personal data in relation to you are outlined in the following table.

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Consent	You have given specific consent to processing your data	There are only limited circumstances where we rely on consent as the legal basis for processing sensitive personal data. If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.
Occupational medicine	Processing being necessary for provision of health care or treatment, medical diagnosis, and assessment of your working capacity subject to confidentiality safeguards	Applicable in the context of assessing capability and supporting and managing health in the workplace.
Legal necessity	Processing being necessary for the purposes of your or our obligations and rights in connection with employment in so far as they are imposed or conferred by law	There are a number of employer and employee rights and obligations conferred or imposed by statute or applicable law. For example we may process data to ensure we comply with our health and safety obligations and obligations under the Equality Act.
Legal claims	Processing being necessary for the purpose of establishing, making or defending legal claims	These could be legal claims by you or others including employment tribunal or personal injury claims.
Public interest	The processing is necessary for reasons of substantial public interest	This can include processing for the purposes of monitoring equality of opportunity or treatment; in relation to our occupational pension scheme; or in relation to the prevention or detection of unlawful acts.
Already public	Processing relating to data about you that you have made public	This may apply, for example, where you have put yourself forward to champion a particular cause which reveals sensitive personal data and we share your details in that context.
Vital interests	Where processing is needed to protect your vital interests (or someone else's interests) and you are not capable of giving your consent	This is only likely to apply in very exceptional circumstances such as in a medical emergency.

4. There are also special protections in relation criminal convictions and offences. We will only process data in relation to criminal convictions in limited circumstances where it is lawful for us to do so including where it is necessary for the purposes or performing or exercising obligations or rights of the employer or employee under employment law and other applicable provisions.
5. Special provisions apply where decisions are made using automated means without any human intervention. We do not envisage that any decisions will be taken about you using automated means but will inform you if this is the case.

Personal data –why we process it and what we hold (further information)

6. We set out below the typical purposes for which we process data relating to our employees, the kind of data processed in each case and the relevant grounds for processing. As explained above processing in this context might include transfers to third parties and/or outside of the EEA. We indicate in red any sensitive personal data identified and our relevant additional ground(s) for processing such data. We have tried to make this as comprehensive as possible but it is not possible to identify all information processed and this is not a definitive list. From time to time, the Company may publish specific notices setting out details regarding particular processes or programs being adopted by us.

Purpose	Kinds of data processed	Grounds for Processing
Recruit and Select Employees (external)	Information created on recruitment obtained to assess your suitability for work and retained for our records, about you and your education and career history provided or created in the context of your recruitment and our assessment of it (e.g. your application form/CV and notes of any interviews and assessments), your references, any checks we may make to verify information provided or background checks and any information connected with your right to work in Austria. Name, Personal details & Status, Private Contact Data – physical & virtual	Legitimate interests
Maintain Employee Personal Data	Billing & Payment Data/Accounts, Company Issued ID, Contract Data, Legitimation Data, Name, national insurance number, Personal details & Status. Private Contact Data – physical & virtual, Qualification & Performance Vehicle Identifiers (FIN), Health Data.	Contract Performance Legal Compliance Legitimate interests
Manage Contracts	In relation to payroll administration this includes your pay and any salary sacrifice information, bank account details, pension contributions, date of birth and tax and national insurance data. In relation to leave information relating to your working time, holiday and other leave and sickness absence. Personal data necessary to provide benefits, such as pension arrangements, death in service, life and medical insurance, car scheme participation and any bonus or share schemes. This may include your date of birth, driving licence information, performance information and information regarding your marital status, Data connected with your continuing employment or the terms on which you work including any change to your pay or benefits (including compensation planning), changes your working arrangements or role or to ending your employment.	Contract Performance Legal Compliance Legitimate interests
Hire Employees	Billing & Payment Data/Accounts, Contract Data, Legitimation Data, Name, national insurance number, Personal details & Status, Private Contact Data – physical & virtual,	Contract Performance
Support Hiring of Agencies	Billing & Payment Data/Accounts, Contract Data, Legitimation Data, Name, national insurance number, Personal details & Status, Private Contact Data – physical & virtual,	Contract Performance
Transfer Employees	Billing & Payment Data/Accounts, Business Contact Data, Company Issued ID, Contract Data, Location/Movement Data, Name, national insurance number, Personal details & Status, Private Contact Data – physical & virtual, Qualification & Performance	Contract Performance
Promote / Demote Employees	Billing & Payment Data/Accounts, Business Contact Data, Company Issued ID, Contract Data, Name,	Contract Performance Legitimate interests
Manage leave of Absence	Business Contact Data, Company Issued ID, Name, national insurance number, Personal details & Status, Private Contact Data – physical & virtual, Contract Data, Health Data	Contract Performance Legal Compliance Legitimate interests

Manage Employee Correspondence	Billing & Payment Data/Accounts, Business Contact Data, Contract Data, Legitimation Data, Name, national insurance number, Personal details & Status, Private Contact Data – physical & virtual, Health Data, Location/Movement Data	Contract Performance Legal Compliance Legitimate interests
Manage Objective Setting	Business Contact Data, Name, Qualification & Performance, Company Issued ID	Legitimate interests
Manage Performance Assessment Process	Name, Personal details & Status, Private Contact Data – virtual, Qualification & Performance, Business Contact Data	Legitimate interests
Manage Reward and Recognition	Company Issued ID, Contract Data, Name, Business Contact Data, Qualification & Performance, Personal details & Status	Legitimate interests
Monitor and Manage Absenteeism	Company Issued ID, Contract Data, Health Data, Name, national insurance number, Personal details & Status, Private Contact Data – physical & virtual,	Contract Performance Legal Compliance
Develop and Manage Training / Apprenticeship Programs	Contract Data, Name, Personal details & Status, Private Contact Data – physical, Qualification & Performance	Contract Performance Legitimate interests
Manage Employee/Retiree Vehicle Programs	Billing & Payment Data/Accounts, Business Contact Data, Company Issued ID, Name, Personal details & Status, Private Contact Data – physical & virtual, Vehicle Identifiers	Contract Performance Legal Compliance Legitimate interests
Manage Employee Benefit Programs	Business Contact Data, Name, national insurance number, Personal details & Status, Private Contact Data – physical	Consent Contract Performance
Manage Employee Pension Schemes	Name; Billing & Payment Data, Accounts; Company Issued ID; Contract Data; Legitimation Data; National / Official / Social ID; Personal Details & Status; Private Contact Data - Virtual	Contract Performance Legal Compliance Legitimate interests
Manage Business Travel	Billing & Payment Data/Accounts, Business Contact Data, Company Issued ID, Contract Data, Name, national insurance number,	Contract Performance Legal Compliance Legitimate interests
Manage Employee Termination	Billing & Payment Data/Accounts, Business Contact Data, Contract Data, Economic Situation, Name, national insurance number, Personal details & Status, Private Contact Data – physical & virtual,	Contract Performance Legal Compliance Legitimate interests
Manage Employee Retirement	Name; National / Official / Social ID; Private Contact Data - Physical; Private Contact Data - Virtual; Business Contact Data - Physical; Business Contact Data - Virtual; Personal Details & Status; Contract Data; Billing & Payment Data / Accounts; Economic Situation; Vehicle Identifiers	Contract Performance Legal Compliance Legitimate interests
Manage Retirees	Billing & Payment Data/Accounts, Business Contact Data, Company Issued ID, Contract Data, Economic Situation, Name, national insurance number, Personal details & Status, Private Contact Data – physical & virtual,	Contract Performance Legal Compliance Legitimate interests
Pay Employees	Billing & Payment Data/Accounts, Business Contact Data, Company Issued ID, Contract Data, Name, national insurance number, Personal details & Status, Private Contact Data – physical & virtual, Vehicle Identifiers	Contract Performance Legal Compliance Legitimate interests
Manage Timekeeping	Business Contact Data, Company Issued ID, Legitimation Data, Name	Contract Performance Legal Compliance

Personal data –why we process it and what we hold – Non-employees

7. We process and hold much less data in relation to our non-employees such as agency workers and contractors. We set out below the main reasons why we process data relating to our non-

employees, the kind of data process in case and the relevant grounds for processing. We have tried to make this as comprehensive as possible but it is not possible to identify all information processed and this is not a definitive list.

<i>Purpose</i>	<i>Kinds of data processed</i>	<i>Grounds for Processing</i>
Recruit and Select Employees (external)	Information created on recruitment obtained to assess your suitability for work and retained for our records, about you and your education and career history provided or created in the context of your recruitment and our assessment of it (e.g. your application form/CV and notes of any interviews and assessments), your references, any checks we may make to verify information provided or background checks and any information connected with your right to work in Austria. Name, Personal details & Status, Private Contact Data – physical & virtual	Legitimate Interests
Maintain Agency Workers Personal data	Billing & Payment Data/Accounts, Company Issued ID, Contract Data, Legitimation Data, Name, national insurance number, Personal details & Status. Private Contact Data – physical & virtual, Qualification & Performance, Vehicle Identifiers (FIN).	Contract Performance Legal Compliance Legitimate interests
Maintain Purchased Service Personal Data	Name, Personal details & Status, Company Issued ID, Legitimation Data, Name,	Legitimate interests Legal Compliance

Status of this Privacy Notice – Supplementary Information

8. This document does not form part of your contract of employment and does not create contractual rights or obligations. It may be amended by us at any time.