

ANNEX A

1. PROCESSING OF YOUR PERSONAL DATA

For the purposes specified in this Annex of this Privacy Policy, we process the personal data obtained from you directly (when you decide to communicate such data to us, i.e., when you contact us, or when you fill in forms displayed on our websites) or indirectly (data provided to us by a third-party). The data subjects in this Privacy Policy are business partners, customers, suppliers and other third parties outside the Company Group. We ensure that your personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. We will always process your personal data based on one of the legal basis provided for in the GDPR (Articles 6 and 7).

We may collect and process your personal data based on the following legal grounds for the following purposes:

The Company Group that adopt this Privacy Policy consist of the companies set out below.

- (1) THK CO., LTD. (THK)
- (2) THK INTECHS CO., LTD. (THK INTECHS)
- (3) Talk System CO., LTD. (Talk System)
- (4) THK RHYTHM CO., LTD. (THK RHYTHM)
- (5) THK Europe B.V. (THK Europe)
- (6) THK GmbH (THK GmbH)
- (7) THK France S.A.S. (THK France)
- (8) THK Manufacturing of Europe S.A.S. (TME)
- (9) THK Manufacturing of Ireland Ltd. (TMI)

I. Purpose: Provision and receipt of products and services between Company Group and business partners (including customers and suppliers) and communication of the products and services.

Personal data obtained from you directly

Specific Purpose	Legal Basis	Controller
Confirmation of the specifications	Legitimate Interests	THK GmbH
Development of new application and function	Legitimate Interests	THK GmbH THK RHYTHM
Preparation of THK drawings	Legitimate Interests	THK GmbH TME
Quotation, orders, deliveries	Legal Obligation Legitimate Interests	THK GmbH THK France THK Europe TME TMI
Outsourcing of transportation and customs clearance	Legitimate Interests	THK GmbH
Order tracking	Legitimate Interests	TME

Deposit of products to external warehouse	Legitimate Interests	THK GmbH
Correspondence with Customs	Legitimate Interests	THK GmbH
Correspondence with Chamber of Commerce	Legitimate Interests	THK GmbH
Accounts payable management	Legitimate Interests	THK GmbH TMI
Accounts receivable management	Legitimate Interests	THK GmbH TMI
Sending the invoices	Legal Obligation Legitimate Interests	THK GmbH TME
Implementation of some examination	Legitimate Interests	THK GmbH
Processing of technical claims	Legitimate Interests	THK GmbH
Troubleshooting	Legitimate Interests	THK GmbH
Application of DIN standard	Legitimate Interests	THK GmbH
Processing of environmental request.	Legitimate Interests	THK GmbH THK
REACH Survey	Legal Obligation Legitimate Interests	TME THK
Monitoring waste and disposal	Legal Obligations Legitimate Interests	TME THK
Provision of rigidity data	Legitimate Interests	THK GmbH
Maintenance of the equipment	Legitimate Interests	TME
Creating organizational chart or list	Legitimate Interests	THK GmbH TME THK Talk System
Confirmation of the contact persons	Legitimate Interests	THK GmbH THK Talk System
Preparation of Calculation/ Risk Assessment	Legitimate Interests	THK GmbH
Obtaining sales information and Market research	Legitimate Interests	THK GmbH THK RHYTHM
Follow up business	Legal Obligation Legitimate Interests	THK GmbH THK France THK Europe
Product sales for customers registered on our website (Omni THK).	Legitimate Interests	THK
Providing services such as products information, CAD data download, lifetime calculation tools, product selection tools.	Legitimate Interests	THK

Administrative communication between Company Group	Legitimate Interests	THK GmbH THK France THK Europe TME TMI THK THK RHYTHM Talk System
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Personal data obtained from you indirectly

Specific Purpose	Categories of Personal Data	Legal Basis	Controller
Quotation, orders, deliveries	Name, Company name, Telephone number (business), Fax number, Email address, Position, Business address, Accounts	Legal Obligation Legitimate Interests	THK GmbH THK France THK Europe TME TMI
Order tracking	Name	Legitimate Interests	TME
Creating organizational chart	Name, Email address	Legitimate Interests	THK GmbH TME
Confirmation of the contact persons	Name, Email address, Telephone number, Business address	Legitimate Interests	THK GmbH
Reporting results of responses to issues with products	Name, Address, Telephone number, Email address	Legitimate Interests	THK
Product sales for customers registered on our website (Omni THK).	Name, Company name, Telephone number (business), Fax number, Email address, Position, Business address	Legitimate Interests	THK
Providing services such as products information, CAD data download, lifetime calculation tools, product selection tools.	County or region, User ID and password, Company name, School name, Company department or Academic department, Telephone number, Fax number, Postal code, Address, Type of industry,	Legitimate Interests	THK

	Type of work, Name, Position, Email address, Native language		
Product sales for customers	Name, Company name, Telephone number (business), Fax number, Email address, Position, Business address	Legitimate Interests	THK, THK RHYTHM, Talk System

We may have legitimate interest in collecting, directly or/and indirectly, and processing your personal data for the purposes listed in the tables above, which is required to offer to customers the products and services of the Company Group, to receive from suppliers the products and services of suppliers and to ensure communication with business partners regarding relevant matters for conducting the business.

A balancing test has been carried out in order to rely on legitimate interest as a lawful basis for processing and data subjects can obtain information on the balancing test upon request.

To the extent these personal data are necessary to comply with our legal obligations, we also relies on the legal basis under Article 6(1)(c) of GDPR ('the processing is necessary in order for compliance with legal obligation to which the controller is subject'). Please note that in the absence of the personal data outlined above, whose processing is also prescribed by the law, we cannot realize and follow up business nor draw a dataflow of business.

II. Purpose: Intoroduction of products and services, sending greeting cards

Personal data obtained from you directly

Specific Purpose	Legal Basis	Controller
Sending greeting cards	Legitimate Interests	THK GmbH TME THK
Sending catalogues	Legitimate Interests	THK GmbH
Sending information related to new products	Legitimate Interests	THK GmbH
Management of exhibition	Legitimate Interests	THK GmbH
Collection of “follow-up sheets” at exhibitions	Legitimate Interests	THK GmbH
Digitalize the “follow-up sheets”	Legitimate Interests	THK GmbH
Provide promotion at customer sites	Legitimate Interests	THK GmbH
Implementation of technical training	Legitimate Interests	THK GmbH
Uploading data to Salesforce	Legitimate Interests	THK GmbH
Use of Infomobile	Legitimate Interests	THK GmbH

Email surveys	Legitimate Interests	THK
Marketing activities on our website (OmniTHK)	Legitimate Interests	THK

Personal data obtained from you indirectly

Specific Purpose	Categories of Personal Data	Legal Basis	Controller
Sending and receiving greeting cards	Name, Business address, Position, Telephone number, Email address	Legitimate Interests	THK GmbH TME
Management of examination	Name, Company name, Department, Telephone and Mobile number, Email address, Business address	Legitimate Interests	THK GmbH
Use of Infomobile	Name, Position, Mobile number	Legitimate Interests	THK GmbH
Email surveys	County or region, User ID and password, Company name, School name, Company department or Academic department, Telephone number, Fax number, Postal code, Address, Type of industry, Type of work, Name, Position, Email address, Native language	Legitimate Interests	THK
Marketing activities on our website (OmniTHK)	Name, Business address, Telephone number, Company name, Department, Position, Email address, Cookie information, IP addresses	Legitimate Interests	THK
Analizing what activities visitors are engaging in our websites	IP addresses, Provider information, Browser information,	Legitimate Interests	THK

	Access history, Cookie information, User ID, Password		
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We may have legitimate interest in collecting, directly or/and indirectly, and processing your personal data for the purposes listed in the tables above, which is required to introduce our products and services to customers, and to send greeting cards.
A balancing test has been carried out in order to rely on legitimate interest as a lawful basis for processing and data subjects can obtain information on the balancing test upon request.

III. Purpose: Response to and management of queries from customers

Personal data obtained from you directly

Specific Purpose	Legal Basis	Controller
Response to telephone inquiries	Legitimate Interests	THK GmbH
Responding to inquiries from the website	Legitimate Interests	THK GmbH
Response to inquiries from the technical support site	Legitimate Interests	THK GmbH
Response to inquiries from the our website (Omni THK)	Legitimate Interests	THK

We may have legitimate interest in collecting, directly or/and indirectly, and processing your personal data for the purposes listed in the tables above, which is required to respond to and manage customers' queries, handle their requests and provide technical support when needed.
A balancing test has been carried out in order to rely on legitimate interest as a lawful basis for processing and data subjects can obtain information on the balancing test upon request.

IV. Purpose: General Operations

Personal data obtained from you directly

Specific Purpose	Legal Basis	Controller
Verification of conformity of the management system operation	Legal Obligation Legitimate Interests	TME
Emergency response	Legal Obligation Legitimate Interests	TME
Risk analysis	Legal Obligation Legitimate Interests	TME
Response to legal claims	Legitimate Interests	THK
Organization of business partners visit	Legitimate Interests For the processing of sensitive data, the legal	THK

	basis is explicit consent (GDPR Article 9(2)(a)).	
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We may have legitimate interest in collecting directly and processing your personal data for the purposes listed in the tables above, which is required to organize and conduct business, exchange essential information with interested parties and operate management systems. A balancing test has been carried out in order to rely on legitimate interest as a lawful basis for processing and data subjects can obtain information on the balancing test upon request.

V. Purpose: Human Resources and labour management of employees of Company Group

Personal data obtained from you directly

Specific Purpose	Legal Basis	Controller
Recruitment of employees	Legal Obligation Legitimate Interests For the processing of sensitive data, the legal basis is explicit consent (GDPR Article 9(2)(a)).	THK GmbH THK France THK Europe
management of annual health check result	Legitimate Interests	TME
management of the transfer and return of a seconded employee	Legitimate Interests	TME
Social cost calculation	Legal Obligation Legitimate Interests	TME
Control of payment of apartments' rent expenses	Legitimate Interests	TME
Labor management of employees of cooperating companies	Legitimate Interests	TME
Tax calculation and declaration	Legitimate Interests	THK GmbH
Managing business trip	Legitimate interests	THK GmbH
Managing stay and work permit and driver's licence	Legitimate interests	THK GmbH

Personal data obtained from you indirectly

Specific Purpose	Categories of Personal Data	Legal Basis	Controller
Recruitment of employees	Name, Business address, Position, Telephone number, Email address	Legitimate Interests	THK GmbH THK France THK Europe

We may have legitimate interest in collecting, directly or/and indirectly, and processing your personal data for the purposes listed in the tables above, which is required to ensure functioning of our relationship with our employees, deal with their requests, fulfil our obligations towards them, e.g. salary, bonus, maternity leave, holiday, company cars, entry cards etc.

A balancing test has been carried out in order to rely on legitimate interest as a lawful basis for processing and data subjects can obtain information on the balancing test upon request.

To the extent these personal data are necessary to comply with our legal obligations, we also relies on the legal basis under Article 6(1)(c) of GDPR ('the processing is necessary in order for compliance with legal obligation to which the controller is subject'). Please note that in the absence of the personal data outlined above, whose processing is also prescribed by the law, we cannot execute payments for salary/bonus/overtime, calculate pension premium, conduct the mandatory by law professional interview, create and register the labour contract, monitor time, approve holiday requests, submit reports to the competent tax authority and proceed with life/accident/health insurance.

VI. Purpose: Operations and management of information systems of Company Group

Personal data obtained from you directly

Specific Purpose	Legal Basis	Controller
Use of distributor info portal	Legitimate interest	THK GmbH
Access backup data	Legitimate interest	THK GmbH TME TMI
System operation	Legitimate interest	THK GmbH
Response to system errors and troubles	Legitimate interest	THK GmbH
Problem determination for IT system	Legitimate interest	TMI
licence management	Legitimate interest	THK GmbH

Personal data obtained from you indirectly

Specific Purpose	Categories of Personal Data	Legal Basis	Controller
Access backup data	Name, Position, Email address, Telephone number, Address	Legitimate Interests	THK GmbH TME TMI
Updates, amendment and maintenance of data of Salesforce	Name, Company name, Business address, Department, Position, Telephone number, Email address	Legitimate interest	THK

Updates, amendment and maintenance of master data	Name, Company name, Business address, Department, Position, Telephone number, Email address, User ID	Legitimate interest	THK
Management of procurement information	Supplier code, Company name, Name, Telephone number, Fax number	Legitimate interest	THK
Identifying the email recipients in Office365	Name, Telephone number, Department, Position, Telephone number (business), Location, Email address	Legitimate interest	THK

We may have legitimate interest in collecting, directly or/and indirectly, and processing your personal data for the purposes listed in the tables above, which is required to organize and operate the Company's information system, e.g. data backup, technical trainings, handle technical problems etc.

A balancing test has been carried out in order to rely on legitimate interest as a lawful basis for processing and data subjects can obtain information on the balancing test upon request.

We will process your personal data for all these specified, explicit and legitimate purposes listed above, and will not further process the personal data in a way that is incompatible with these purposes. If we intend to process personal data originally collected for one purpose in order to attain other objectives or purposes, we will ensure that you are informed of such processing purposes. We will keep your personal data only for as long as it is necessary for us to comply with our legal obligations to ensure that we provide an adequate service, and to support its business activities (Article 5 and 25(2) GDPR).