



Data Privacy Policy

for employees of MTU Aero Engines AG
MTU Maintenance Hannover GmbH and
MTU Maintenance Berlin-Brandenburg GmbH
(hereinafter individually referred to as “MTU”)



MTU takes the protection of the personal data of its employees, former employees, temporary employees or applicants (collectively referred to as “employees”) very seriously. We process personal data in accordance with the applicable data protection and data security laws.

§ 1 Controller and scope of application

The controller in the sense of the European General Data Protection Regulation (“GDPR”), the German Data Protection Act (“BDSG”) and other data protection regulations is your respective employer:

- For employment contracts with MTU Aero Engines AG:

MTU Aero Engines AG
Dachauer Str. 665
80995 Munich

- For employment contracts with MTU Maintenance Hannover GmbH:

MTU Maintenance Hannover GmbH
Münchner Str. 31
30855 Langenhagen

- For employment contracts with MTU Maintenance Berlin-Brandenburg GmbH:

MTU Maintenance Berlin-Brandenburg GmbH
Dr.-Ernst-Zimmermann-Str. 2
14974 Ludwigsfelde

§ 2 Privacy officer

The controllers’ privacy officers are:

Helga Schorr
MTU Aero Engines AG
Dachauer Str. 665
80995 Munich

Email: MTU.DSB@mtu.de

Jens Ramming
MTU Maintenance Hannover GmbH
Münchner Str. 31
30855 Langenhagen

Email: MTU-H.DSB@mtu.de

Mario Niemeyer
MTU Maintenance Berlin-Brandenburg GmbH
Dr.-Ernst-Zimmermann-Str. 2
14974 Ludwigsfelde

Email: LUD_Datenschutz@mtu.de

§ 3 What are personal data?

Personal data are individual details about personal or factual situations of a specific or identifiable natural person (data subject). This includes, for example, identification details such as your name or date of birth, address and contact details such as your address, phone number, e-mail address or billing and bank details. Information with which we cannot (or can only with a disproportionate effort) establish a reference to your person, e.g. by making the information anonymous, is not personal data.

§ 4 General information on data processing

a) Scope

In general, we only collect and use our employees' personal data, if, and to the extent, this is required for the preparation, execution and processing of an (existing, completed or future) employment contract between the employee and MTU.

Your personal data shall not be used for any other purpose, especially not for advertising purposes. We shall not transmit your personal data to third parties without your consent, except in the cases outlined below, unless we are obliged to disclose them by law (e.g. to social security agencies).

We will transmit your personal data for the purposes listed under Section 5 to companies affiliated with MTU Aero Engines AG in the sense of Articles 15 et seq. AktG (Stock Corporation Act), if necessary in connection with your employment. If necessary we will also, where legally permitted, transmit personal data to courts, authorities (esp. tax authorities) or legal advisers in order to comply with applicable law or to assert, exercise or defend against legal claims.

Furthermore, in connection with your employment, it may be necessary for us to transmit your personal data to other recipients, such as tax consultants, insurers or business partners.

Where we transmit personal data to service providers (e.g. IT service providers) acting on behalf of our company, we will contractually oblige them in advance to comply with the applicable requirements of data protection law and they shall be subject to our instructions.

b) Legal basis

§ 26 Section 1 of the BDSG shall serve as the legal basis for processing the personal data required to execute and pursue your employment contract. Article 6, Section 1c, of the GDPR shall serve as legal basis for processing the personal data required to fulfil a legal obligation of our company.

If processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the former interest, Art. 6, Section 1f) of the GDPR shall serve as legal basis for processing. Our legitimate interest in the processing is to ensure the efficiency and success of our company's activity and effective pursuit of our contractual relationship. Moreover, § 26 Section 12 of the BDSG may serve as a legal basis, provided that you have expressly consented to the processing of your personal data in individual cases.

c) Data deletion and storage time

Your personal data shall be erased or blocked as soon as the purpose of storage ceases to apply. However, the data may be stored if provided for by European or national laws or other statutory provisions to which MTU is subject. The data shall be blocked or erased at the end of a storage period prescribed by the aforementioned standards, unless the data needs to be stored further in order to conclude or implement a contract.

§ 5 Purpose of data processing

We process your personal data especially for the following purposes:

- Preparing, pursuing and handling your employment, including related communication, remuneration processing, etc;
- Personnel and organisation management (in particular for purposes of personnel planning, employee development, planning and providing the necessary work tools and workplace equipment, etc.);
- Risk management and performance of audit procedures to prevent, detect, and react to, illegal, irregular or contractually non-compliant conducts;
- Compliance with legal (in particular social-security, aviation, tax, commercial or export control law) obligations;
- Assertion of legal claims and their (judicial or extra-judicial) enforcement.

§ 6 Categories of personal data

The processing of the following categories of personal data is required for the above purposes:

- Personal identification details such as surname, first name, root number, tax number, user key;
- Address and contact details;
- Billing and bank details, i.e. information required to process payments;
- Profile details such as qualifications, appraisals, attendances and absences, usage data from MTU's IT systems (e.g. log files);
- Health data (e.g. for the payment of sick pay);
- Other data such as data on the nature of employment (e.g. temporary, part-time employment), information about participation in further training programmes, information for the preparation and execution of business trips, etc.

§ 7 Security measures to protect the data stored with us

We undertake to protect the personal data we store and to treat it as confidential. To prevent the loss or misuse of data stored by us, we take extensive technical and organisational safety precautions which are regularly checked and adapted to technological progress. However, we would like to point out that due to the structure of the Internet, the data protection rules and the above-mentioned safety measures may not be observed by other people or institutions outside our field of responsibility. In particular, unencrypted data transmitted by e-mail, for instance, can be read by third parties. We have no technical influence on this.

§ 8 Data subjects' rights

If we process your personal data, you may be entitled to certain rights. This may include the following rights in particular:

1. The right to obtain information about your data

You can ask for a confirmation of whether your personal data are processed by our company.

If this is the case, you can request for the following information, provided that other people's rights or freedoms are not violated by the information:

- (1) the purposes for which the personal data are processed;
- (2) the categories of personal data processed;
- (3) the recipients or categories of recipients to whom your personal data have been or are still being disclosed;
- (4) the planned duration of the storage of your personal data or, if specific information on this is not possible, the criteria for determining the storage period;
- (5) the existence of a right to rectify or erase your personal data, a right to have the data processing restricted by us, or a right to object to such processing;
- (6) the existence of a right to appeal to a supervisory authority;
- (7) all available information on the origin of the data, if the personal data was not obtained from you.

You have the right to request for information as to whether your personal data is transferred to a third country or to an international organisation. In this regard, you can request information on the appropriate safeguards in accordance with Art. 46 GDPR in connection with the transfer of the data.

2. Right to rectification

You have the right to rectify and/or complete your personal data if your personal data are incorrect or incomplete. We shall then make the correction or completion without undue delay.

3. Right to restriction of processing

You may ask for the processing of your personal data to be restricted on the following terms and conditions:

- (1) if you are contesting the accuracy of your personal data;
- (2) if the processing is unlawful and you reject the deletion of the personal data and instead demand that the use of the personal data be restricted;
- (3) when our company no longer requires the personal data for the purposes of processing, but you require them in order to assert, exercise or defend against legal claims; or
- (4) if you have filed an objection to the processing pursuant to Art. 21, Section 1 of the GDPR and it has not yet been determined whether our company's legitimate reasons outweigh your reasons.

If the processing of your personal data has been restricted, such data may only be processed - apart from being stored - with your consent or for the purpose of asserting, exercising or defending rights or protecting the rights of another natural or legal person or on grounds of an important public interest of the European Union or a Member State.

If the restriction on processing has been limited on the above conditions, we shall inform you before the restriction is lifted.

4. Right to erasure

a) Deletion obligation

You may ask for the deletion of your personal data and our company is obliged to delete these data without undue delay if:

- (1) Your personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
- (2) You revoke your consent, on which the processing was based pursuant to § 26 Section 2 of the BDSG or Art. 9, Section 2a) of the GDPR, and there is no other legal basis for the processing.
- (3) You file an objection against the processing pursuant to Art. 21, Section 1 of the GDPR and there are no overriding legitimate reasons for the processing, or you file an objection against the processing pursuant to Art. 21, Section 2 of the GDPR.
- (4) Your personal data have been processed unlawfully.
- (5) Deleting your personal data is necessary to fulfil a legal obligation under EU law or the law of the Member States to which we are subject.
- (6) Your personal data have been collected regarding the services offered by the information company pursuant to Art. 8, Section 1 of the GDPR.

b) Information to third parties

If we have made your personal data public and we are obliged to delete them pursuant to Art. 17, Section 1 of the GDPR, we shall take appropriate measures, including technical measures, considering the available technology and the implementation costs, to inform the processors of the personal data for which you as the data subject have asked for the deletion of all links thereto or of copies or replications thereof.

c) Exceptions

There is no right to erasure if the processing is required

- (1) to exercise the right of freedom of expression and information;
- (2) to fulfil a legal obligation required for processing under EU law or the law of Member States to which our company is subject, or for the performance of a task in the public interest or in the exercise of official authority conferred on our company;
- (3) for reasons of public interest in the field of public health pursuant to Art. 9, Sections 2h) and i), and Art. 9, Section 3 of the GDPR;
- (4) for archiving purposes in the public interest, scientific or historical research purposes or for statistical purposes pursuant to Art. 89, Section 1, of the GDPR, insofar as the law referred to under a) is likely to render impossible or seriously impair the attainment of the objectives of such processing, or
- (5) to assert, exercise or defend legal claims.

5. Right to information about recipients

If you have asked us to correct, delete or restrict the processing of your personal data, we must inform all recipients of your personal data about this correction or deletion of the data or restriction on processing, unless this proves impossible or entails a disproportionate effort.

You have the right to be informed about such recipients.

6. Right to portability

You have the right to receive the personal data you have made available to us in a structured, accessible and machine-readable format. You also have the right to transfer these data to another controller, provided that

- (1) processing is based on consent pursuant to § 26 Section 1 of the BDSG or Art. 9, Section 2a) of the GDPR or on a contract pursuant to Art. 6, Section 1b) of the GDPR and
- (2) processing is carried out automatically.

While exercising this right, you also have the right to request that your personal data are transferred directly by us to another controller, so far as this is technically feasible. Other people's freedoms and rights must not be affected by this.

The right to portability shall not apply to the processing of personal data needed to perform a task in the public interest or to exercise an official authority conferred on our company.

7. Right to revoke the data protection consent

You have the right to revoke your data protection consent at any time. The revocation of consent shall not affect the legality of the processing carried out on the basis of the consent until revocation.

8. Right to object

You have the right to object at any time to the processing of your personal data due to your particular situation. We shall no longer process your personal data, unless there are protection-worthy compelling reasons for the processing, which outweigh your interests, rights and freedoms, or unless the processing is used to assert, exercise or defend legal claims.

9. Right to appeal to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to appeal to a supervisory authority, in particular at your habitual residence, your place of work or the place of the alleged infringement, if you believe that the processing of your personal data infringes on the GDPR.

Supervisory authority in Bavaria:

Bayerisches Landesamt für
Datenschutzaufsicht (BayLDA)
Promenade 27
91522 Ansbach

Supervisory authority in Lower Saxony:

Die Landesbeauftragte für den Datenschutz
Niedersachsen
Prinzenstraße 5
30159 Hannover

Supervisory authority in Brandenburg:

Die Landesbeauftragte für den Daten-
schutz und für das Recht auf Akteneinsicht
Stahnsdorfer Damm 77
14532 Kleinmachnow

Overview

The following privacy notices give an overview of the collection and processing of your data. For the complete information, please refer to the data privacy policy for employees.

Information about the data processor		
Controller's contact details: MTU Aero Engines AG Dachauer Str. 665, 80995 Munich Phone: +49 89 1489 - 0 Fax: +49 89 1489 - 5500 E-mail: info@mtu.de Website: www.mtu.de	Privacy officer's contact details: Helga Schorr MTU Aero Engines AG Dachauer Str. 665, 80995 Munich Phone: +49 89 1489 - 0 Fax: +49 89 1489 - 5500 E-mail: MTU.DSB@mtu.de	
Processing framework		
Collected personal data: <ul style="list-style-type: none">• Personal identification details such as surname, first name, root number, tax number, user key;• Address and contact details• Billing and bank details, i.e. information required to process payments;• Profile details such as qualifications, appraisals, attendances and absences, usage data from IT systems (such as log files);• Health data (e.g. for the payment of sick pay);• Other data such as data on the nature of employment (e.g. temporary, part-time employment), information about participation in further training programmes, information for the preparation and execution of business trips, etc.	Purpose of data processing: <ul style="list-style-type: none">• Preparing, pursuing and handling your employment relationship, including related communication, remuneration processing, etc.• Personnel and organisation management (in particular for purposes of personnel planning, employee development, planning and providing the necessary work tools and workplace equipment, etc.);• Risk management and performance of audit procedures to prevent, detect, and react to, illegal, irregular or contractually non-compliant conducts;• Compliance with legal (in particular social-security, aviation, tax, commercial or export control law) obligations;• Assertion of legal claims and their (judicial or extra-judicial) execution.	Legal basis: <ol style="list-style-type: none">1. § 26 Section 1 BDSG2. Art. 6, Sections 1 c) and f) of the GDPR3. Consent (§ 26 Section 2 BDSG)
Data subjects' rights		
As a data subject, you have the following rights: <ul style="list-style-type: none">• The right to obtain information about your data• Right to rectification• Right to restriction of processing• Right to erasure• Right to information about recipients• Right to portability• Right to revoke the data protection consent• Right to object• Right to appeal to a supervisory authority		