



Flender Ltd., China
Notification on the Cross-border Transfer of Personal Information of
Customer Contact Persons
(Salesforce)

Dear Sir/Madam,

In accordance with the Cybersecurity Law of China, Data Security Law of China, Personal Information Protection Law of China and other relevant Chinese laws and regulations in connection with the cross-border transfer of personal information (“**Laws and Regulations**”), and for the purposes of implementing the compliance obligations in terms of the cross-border transfer of the personal information, Flender Ltd., China (the “**Company**”) hereby issues this Notification to you as below.

The purpose of this Notification is to clearly inform you that what types of your personal information under what scenarios will be transferred to the German headquarter of the Company, Flender GmbH (“**German Headquarter**”), the purposes and measures of processing your personal information, retention period, the impact to your rights and interests, your data subject rights, and the procedure of exercising your data subject rights. **Please read carefully and completely understand this Notification, after which please also fill in the Receipt and return to the Company.**

- I. Based on the business relationship between your employer and the Company, the Company is the “Processor” of your personal information. The Company may routinely transfer your personal information to the German Headquarter under the global deployment and management requirements.
- II. As the recipient of your personal information, the contact information of the German Headquarter is as follows:

Name: Flender GmbH
Head of Data Privacy
Address: Alfred-Flender-Straße 77, 46395 Bocholt, Germany
Email: dataprivacy@flender.com
Telephone: 0049 2871 / 92 2782

- III. The purposes and measures of processing your personal information by the Company and the German Headquarter, the relevant information systems, and the types of personal information transferred outside of China
 1. For the purposes of business development and sales management: including (a) for the Company to develop the market, make contact, and manage the business opportunities; (b) for the German Headquarter to implement a common marketing strategy, conduct international sales, and to market together with the Company (e.g., for the German

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Headquarter to have meetings with the Chinese customer contact persons together with the Company's sales staff); for the German Headquarter to conduct surveys with the customers and improve the customers' satisfaction; for the German Headquarter to contact the Chinese contact persons and to build up a long-term relationship with the Chinese customers, as well as to seek co-development between Flender and the brands of customers'.

(1) The information systems involved:

- Salesforce

(2) Types of your personal information transferred outside of China:

Customer contact person's name, mobile number, email, company, title and visiting records

After being transferred abroad, your personal information is used by the Company and the German Headquarter, or to the necessary extent shared within Flender group, only to the limit of the above purposes. Your personal information is not going to be analyzed to create your profile and used for automated decision making.

IV. Retention period after transmission abroad

Your personal information will be retained according to the following principles:

- Please inform us when you leave or retire from your employer. If your personal information is no longer necessary to be processed, we will, through the German Headquarter, delete your personal information or will stop processing your personal information except for taking secure storage measures.
- All your personal information will be deleted on the 30th day of the German Headquarter terminating the contract with Salesforce vendor.

V. Protection measures after the cross-border transfer of your personal information

After your personal information is transferred to the German Headquarter, the German Headquarter will take thorough technical measures and organizational measures to protect your information, according to the requirements of GDPR, the German data protection law, and Flender internal rules and agreements, including but not limited to:

- Your personal information is processed (including being provided to or shared with third parties) only to the extent of being necessary to realize the specific purposes.
- For the specific purposes, only the smallest scope of your personal information is to be processed.

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- Subject to the level of sensitivity and the potential impact to your rights and interest, authentication, access control and anti-data leakage measures are taken to ensure the security, confidentiality and integrity of your personal information.
- The staff of German Headquarter who have access to your personal information receive trainings on data privacy and are bound by confidentiality obligations based on their employment relationship with the German Headquarter.
- German Headquarter has set up Data Privacy Organization (which is a part of legal Organization) which is led by Head of Data Privacy.
- German Headquarter has the Lead who is in charge of information security.
- German Headquarter has transformed the personal information protection requirements in GDPR and in the German local legislations into Flender internal bylaws, requiring all the employees to enhance the awareness of personal information protection, and abide by the personal information processing rules.

The above measures will ensure the security of your personal information to the greatest extent after being transferred abroad.

VI. The provision to other third parties outside of China of your personal information by German Headquarter

As the recipient, instead of processing and using your personal information by itself, German Headquarter also shares your personal information within the Flender group to the extent of necessity to realize the purposes as mentioned in this Notification (for example, to share your personal information within Flender group for implementing a global marketing strategy, to improve the sales management efficiency, to conduct co-marketing across different countries). When sharing your personal information within the group, the following mechanisms are taken by German Headquarter to safeguard the safety of your personal information:

Based on the requirements of GDPR, all Flender companies have signed an Intercompany Agreement on Data Processing (“ICA”), which provides the rights and obligations regarding data privacy of the parties when the personal information is shared among them. Such ICA can guarantee that the sub-recipient also complies with the common terms of the ICA and meets the data privacy common standard of EU when your personal information is shared by the German Headquarter with other Flender companies (on the basis of necessity).

The list of Flender companies (excluding the Company and German Headquarter) is attached to this Notification.

VII. Your data subject rights

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In the scenario of cross-border transfer of your personal information to the German Headquarter hereof, you are the Third-party Beneficiary. Under the Personal Information Protection Law of China, you have the rights to access, obtain the copy, supplement, make corrections, revise and request to delete your personal information, and you also have the right to request for illustration of the processing ways of your personal information.

Please be advised that as your personal information is being transferred to the German Headquarter on the basis of the necessary purposes as mentioned hereof and of the fact that the systems are directly located outside of China, therefore, once you require to delete your personal information or reject a specific cross-border transfer scenario, your employer may not be able to conduct business cooperations with the Company and the German Headquarter.

VIII. The channel and procedure for your exercising your data subject rights

Should you have any question regarding the cross-border transfer of your personal information, or have any claim or complaint regarding your data subject rights, please contact the Company and/or German Headquarter through the following channels:

Department: Legal & Compliance
Data Privacy Officer
Tele: 022-28402362
Email: LC.FLC.cn@flender.com

Flender Ltd., China
October 13th, 2023



Attachment: List of Flender companies (excluding the Company and German Headquarter)

Flender Group GmbH	Flender (Pty) Ltd. (South Africa)
Flender Holding GmbH	Flender Pte. Ltd. (Singapore)
Flender International GmbH	Flender Drives Private Limited (India)
Flender France Holdings SAS	Flender SpA (Chile)
Flender-Graffenstaden SAS	Flender K.K. (Japan)
Flender Industriegetriebe GmbH	Flender Corporation (USA)
Flender d.o.o., Subotica	Moventas Holdings Oy (Finland)
Flender B.V.	Moventas Gears Oy (Finland)
Flender S.R.L. (Belgium)	Moventas Gears GmbH (Germany)
Flender GmbH (Austria)	Moventas Gears Inc. (USA)
Flender Italia S.r.l.	Moventas Gears S.L.U. (Spain)
Flender Iberica S.L.	Moventas Gears S.r.l. (Italy)
Flender Limited (UK)	Moventas Wind UK Limited (UK)
Flender Mekanik Güc Aktarma Sistemleri Sanayi ve Ticaret Anonim	Moventas Gears UK Limited (UK)
Flender Pty. Ltd. (Australia)	Moventas Gears Australia Pty. Ltd.
	Moventas Gears Limited (Canada)