# Data protection declaration "Regular Products"

## Information on the handling of your personal data

To participate in our events, such as workshops, major events, assessment centers, or coaching sessions, it may be necessary for us to process your personal data.

Below, we inform you about the type and scope of this data processing.

### Data controller

The entity responsible for data processing depends on your relationship with us. Either Manres AG or Manres GmbH is responsible:

- Manres AG
  Kantstrasse 14
  8044 Zürich
  Switzerland
  Phone: +41 44 396 22 44
  E-Mail: mail@manres.com
- Manres GmbH
  Uhlandstrasse 20-25
  10623 Berlin
  Germany
  Phone: +49 30 220 119 74
  E-Mail: mail@manres.com

The applicable responsibility depends on which company you are in a contractual relationship with or which company invited you to an event.

### EU Representative

Pursuant to Article 27 GDPR, the EU representative of Manres AG is:

Manres GmbH
Uhlandstrasse 20-25
10623 Berlin
Germany
Phone: +49 30 220 119 74
E-Mail: mail@manres.com

### Data Protection Officer

You can reach our data protection officer at datenschutz@manres.com

### Purposes and legal bases of data processing

We process personal data in accordance with the General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), and/or the Swiss Federal Data Protection Act (Swiss DPA).

- If the data subject is located in the EU or the processing takes place within the EU, the GDPR applies.
- If the data subject is located in Switzerland or the processing concerns persons in Switzerland, the Swiss DPA applies.

**National data protection regulations in Germany:** In addition to the data protection regulations of the GDPR, national regulations apply to data protection in Germany. This includes in particular the Law on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated individual decision-making, including profiling. Furthermore, data protection laws of the individual federal states may apply.

**Relevant legal basis according to the Swiss Data Protection Act:** If you are located in Switzerland, we process your data based on the Federal Data Protection Act (abbreviated as "Swiss DPA", effective from 01 September 2023). This also applies if our processing of your data otherwise affects you in Switzerland and you are affected by the processing. The Swiss DPA does not generally provide that a legal basis for the processing of personal data must be stated (unlike, for example, the GDPR). We process personal data only when the processing is lawful, is conducted in good faith, and is proportionate (Article 6 (1) and (2) of the Swiss DPA). Furthermore, we only collect personal data for a specific purpose that is recognisable to the person concerned and process it only in a manner that is compatible with these purposes (Article 6 (3) of the Swiss DPA).

**Reference to the applicability of the GDPR and the Swiss DPA:** These privacy notices serve both to provide information in accordance with the Swiss Federal Act on Data Protection (Swiss DPA) and the General Data Protection Regulation (GDPR).

In order to enable you to participate in our events, such as workshops, major events, assessment centers or coaching sessions, it may be necessary to process your personal data.

These data concern in particular:

- Your name
- Your address
- Your e-mail address
- Your phone number
- Your professional position / job title
- Your gender
- Your age and/or your date of birth
- Your nationality
- Your affiliation to a division / department / team, etc.;
- If applicable, psychometric data, e.g., when participating in a psychometric personality questionnaire
- Potentially your resumé/CV
- Personal topics, if applicable also information about family members and family relationships.

You may receive a summary of the event, for which we usually use pictures of the event in the sense of impressions and memories. For this purpose, we may process:

- Photos where you can be seen.

The pictures in question will only be used in the final version and will not be subject to any further significant processing. We expressly point out that there is no legal or contractual obligation for you to consent to this data processing. In the event of an objection to the use of your images, no negative effects will arise for you. Participation in an event will still be possible without any restrictions. We also expressly point out that the images will be used exclusively for the aforementioned purpose of producing summaries. These images will only be shared with you, other event participants, employees of Manres AG or Manres

GmbH and, if applicable, our service providers and, if applicable, the responsible offices of our client (e.g., HR). No advertising use of your pictures shall be made without your explicit and separate consent.

**Depending on the event and service, not all of these personal data will be processed,** but only those that are necessary to enable you to participate in our events or to fulfill the contract concluded with us.

## Legal Basis for Data Processing

Article 6(1)(b) GDPR: Processing is necessary for the performance of a contract with you.
Article 6(1)(f) GDPR: If the contract is between us and your employer or another third party, processing is based on our legitimate interest in fulfilling the contract with our client and enabling your participation in our services.

If we have not collected your personal data from you, it has usually been provided to us by our client (e.g. your current or potential employer) (information pursuant to Art. 14 para. 2 lit. f GDPR).

The legal basis for the processing of this data is the fulfillment of an existing contract with you Art. 6 para. 1 lit. b GDPR.

If the relevant contract was not concluded directly between you and us, but for example via your employer or another third party, the legal basis for data processing is a balancing of interests in accordance with Art. 6 para. 1 lit. f GDPR, whereby our specific legitimate interest lies in the fulfillment of the contract with our contractual partner, to enable you to participate in the services we offer and to offer you a high quality of service.

Examples of how we use your data to enable you to participate in our events and services are:

- Using personal details like your name, job title, and/or affiliation to a division/department/team to create participant lists
- Sending you information regarding upcoming events that you will participate in or sending you a digital summary of the event via e-mail
- Arranging and/or confirming an appointment by phone, e.g., for a personal coaching session
- Using a psychometric personality profile as a basis for a more effective coaching process
- Taking notes during a team workshop or a coaching session during which you might share information regarding personal topics; using these notes to continuously work on relevant topics with you

After our events, we may request feedback from you, which you can provide through a link to an online survey tool. In this process, we process the following data:

- Quantitative assessments of the respective event
- Optionally, a 'Net Promoter Score' (willingness to recommend our company on a scale of 1-10)
- Optionally, qualitative assessments of the respective event and suggestions for improvement in the future

We do not process data that can directly identify you (such as your name). Your IP address is also not stored in the feedback data. It is conceivable, based on your qualitative feedback, that you could be indirectly identified. However, it is not our intention to do so.

The legal basis for data processing is a weighing of interests in accordance with Article 6(1)f GDPR, whereby our specific legitimate interest consists in continually improving our services and to be able to support you or our client as effectively as possible in the future. This simultaneously constitutes the purpose of data processing. We explicitly emphasize that providing feedback is voluntary, and you will not suffer any disadvantages if you choose not to provide feedback.

## Recipients of personal data

Your data may be passed on internally to employees of the Manres company group, exclusively for the purpose of fulfilling the contract. In specific cases, we work with subcontractors who are bound to secrecy on the basis of the contractual relationship with Manres. In such cases, we may share your information with these subcontractors for the purpose of fulfilling the contract.

Processors used by us (Article 28 GDPR) may also receive data for these purposes. These are in the present case companies in the categories: IT services and telecommunications.

The data will not be passed on to other third parties.

## Data transfers to third countries

As Manres AG (Switzerland) and Manres GmbH (Germany) work closely together, it may be necessary for personal data to be transferred between the two companies, in particular for central administration, contract fulfillment or the use of shared IT infrastructures.

Data is transferred between the EU and Switzerland on the basis of the EU Commission's adequacy decision for Switzerland.

## Duration of data storage

We generally store your data for as long as is necessary to achieve the purpose pursued in each case or for as long as we are obliged to do so by law.

- In Germany, for example, § 257 HGB, § 147 AO apply.
- In Switzerland, storage is governed by Art. 958 OR.
- If you have consented to further storage of your data, for example for internal training purposes, we will store your data on this basis for as long as the training documents are used.

Unless a longer period is required by law or results from an existing contractual relationship, your data will be stored for a maximum period of 3 years after the end of the contract. The period begins on the day following completion of the last contractual service. Based on previous business experience and standard industry practice, the retention period is determined by the purpose of the warranty or similar contractual claims, as well as a potential continuation or resumption of the collaboration in subsequent years.

## Rights of data subject

Depending on the applicable law, you have the following data protection rights:

- Information about stored personal data
- Correction of incorrect or incomplete data
- Deletion of data, provided there are no retention obligations
- Restriction of processing under certain conditions
- Data portability (according to GDPR)
- Right to object to data processing on the basis of legitimate interest
- Right to lodge a complaint with a data protection supervisory authority

Depending on the applicability, you have the right to request confirmation as to whether personal data concerning you is being processed, as well as a right to information about this personal data and further information in accordance with Art. 15 GDPR and Art. 25 Swiss FADP.

You also have the right to request the rectification of inaccurate personal data concerning you and the completion of incomplete personal data in accordance with Art. 16 GDPR and Art. 32 para. 1 Swiss FADP.

In accordance with Art. 17 para. 1 GDPR and Art. 32 para. 2 Swiss FADP, you can request the erasure of your personal data if one of the legal requirements is met. You also have the right to request the restriction of processing in accordance with Art. 18 para. 1 GDPR if one of the conditions specified therein applies.

If the GDPR applies, you have the right to data portability in accordance with Art. 20 GDPR, which enables you to receive your personal data in a structured, commonly used and machine-readable format. If the Swiss FADP is applicable, you can request the handover of your data in a commonly used electronic format in accordance with Art. 28 Swiss FADP.

If you believe that the processing of your personal data violates applicable data protection regulations, you have the right to lodge a complaint:

Pursuant to Art. 77 GDPR to a competent data protection supervisory authority within the European Union.
Pursuant to Art. 49 Swiss FADP to the Federal Data Protection and Information Commissioner (FDPIC).
Please note that you may need to provide us with certain personal data in order to ensure the fulfillment of an existing contract with you or a contract that we have concluded with your employer or another third party.

## Right of objection

Depending on the applicability, you have the right under Art. 21 GDPR or Art. 32 para. 2 and Art. 30 para. 2 Swiss FADP to object to the processing of your personal data if this is based on Art. 6 para. 1 lit. f GDPR (balancing of interests) or a comparable provision of the Swiss FADP.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defense of legal claims.

The objection can be made informally and should preferably be sent to the following e-mail address: datenschutz@manres.com

As of: 07. November 2026