

Data Subject Request Policy

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1 PURPOSE

This Data Subject Rights Policy (the “Policy”) sets out how Diebold Nixdorf (‘DN’ or ‘the Company’) will handle requests from data subjects or their representatives to exercise their rights under data protection laws. or where DN is contractually committed to assist another entity regarding data subject requests (“DSR”).

2 SCOPE

This Policy applies worldwide to all directors, officers, employees and contract workers of Diebold Nixdorf.

3 REQUIREMENTS

3.1 Responsibilities

Diebold Nixdorf management is responsible for compliance with this Policy. If there is reason to believe that local law requirements or other legal obligations contradict the duties under this Policy or require additional policies, please contact the Chief Ethics and Compliance Officer. In the event of conflicts between applicable local laws, rules or regulations and this Policy, Diebold Nixdorf will work to find a practical solution that reconciles the requirements.

When you are processing personal data, you are responsible for the confidentiality and security of this personal data and for complying with this Policy. If you believe that there has been a breach of this Policy, please report it to dataprivacy@dieboldnixdorf.com.

3.2 Rights of Data Subjects

Diebold Nixdorf shall comply with the principles set out in privacy and data protection laws addressing Data Subject rights, taking into account Diebold Nixdorf's different roles in processing personal data.

3.2.1 Diebold Nixdorf as a Data Controller

When Diebold Nixdorf receives a DSR in its role as Data Controller, it must follow the [Data Subject Right Request Procedure](#) to respond to DSR requests which requires the involvement of the DN Data Privacy and Human Resources departments. Depending on the type of request, additional actions may be necessary.

No personal data should be provided to any requestor without the approval of the [DN Data Privacy Team](#).

3.2.2 Diebold Nixdorf as a Data Processor

When Diebold Nixdorf receives a DSR in its role as data processor, it must notify the Controller (usually this is the Customer) about the DSR, follow the instructions of the Controller in responding to the DSR and provide reasonable assistance to the Controller in responding to the DSR. This assistance will take different forms depending on the right(s) exercised in the DSR.

Controllers may request assistance from Diebold Nixdorf to respond to a DSR that the Controller received directly from an individual or require Diebold Nixdorf to take certain actions so the Customer can fulfill a DSR (e.g., delete personal data that Diebold Nixdorf is processing on the Customer's behalf).

No personal data should be provided to the Controller or actions taken with respect to the personal data processed on behalf of the Controller without the approval of the [DN Data Privacy Team](#). In some jurisdictions, there may be exemptions to complying with a request or legal reasons why Diebold Nixdorf cannot comply with a request. The [DN Data Privacy Team](#) will inform the Controller if there is an applicable exemption or a legal reason why Diebold Nixdorf cannot comply with a request.

3.2.3 Personal data held by more than one Diebold Nixdorf company

If a data subject making the request has a connection to more than one DN entity, and the request is not in a form that narrows the request to one Data Controller, clarification by the [DN Data Privacy Team](#) must be sought about which Data Controller(s) the data subject is referring to. The DSR can be treated as a combined request and either a combined response or two separate responses can be issued.

3.2.4 Audit Trail and Recordkeeping

Diebold Nixdorf will keep robust records for each DSR and will track progress and completion of DSR in HighQ. Diebold Nixdorf will keep copies of the responses to the Controller/Customer (in accordance with the DN [Information Retention Schedule](#), part of the [Information Management Policy](#) standard) and record the date the responses were provided to the requestor.

4 UPDATES TO THIS POLICY

Diebold Nixdorf may from time-to-time review and revise this Policy. If any significant changes are made, Diebold Nixdorf shall take reasonable steps to inform all Diebold Nixdorf personnel about the updated policy.

5 POLICY COMPLIANCE

Diebold Nixdorf will monitor compliance with this Policy on an ongoing basis by various means including reports from available business tools, internal and external audits, self-assessment and/or feedback to the Policy owner(s). Diebold Nixdorf will periodically verify that this Policy continues to conform to applicable privacy and data protection laws and is being complied with. Deviations or non-compliance with this Policy may result in disciplinary actions.

6 CONTACTS

If you have any questions regarding this guideline, please contact dataprivacy@dieboldnixdorf.com.

If you are aware of any violations of this Policy, it is your duty to report that violation to management or through the EthicsPoint hotline, which is available by telephone at 1-866ETHICSP (1-866-384-4277) and online at <http://www.ethicspoint.com>.

7 DEFINITION / TERMS AND ABBREVIATIONS

Term	Definition
Data Controllers	determines the purposes for which and the means by which Personal Data is processed. When DN decides 'why' and 'how' the Personal Data should be processed it is the Data Controller. Employees processing personal data within your DN do so to fulfil DN tasks as data controller.
Data Subject	is an identified or identifiable natural person
Data Subject Rights	are provided by data protection laws in some of the jurisdictions where Diebold Nixdorf operates to individuals whose personal data is processed. These rights vary depending on applicable data protection law. Under these laws, individuals generally have the right to access, correct and delete their personal data. In some jurisdictions, individuals also have the right to restrict or object to the processing of their personal data or opt-out of the sale of their personal data. When an individual exercises their data protection rights, they create a Data Subject Request ("DSR").
Data Processors	process Personal Data <u>only</u> on behalf of the Data Controller. In the case of groups of undertakings, one undertaking may act as processor for another undertaking.
Personal data	is any information that can directly or indirectly be used to identify an individual, whether that individual is a Diebold Nixdorf employee, contract worker or job applicant; employee of a customer; end consumer of a customer; employee of a vendor; or any other third party. Examples of personal data are name, email address, phone number, photograph and government-issued identification number.
Processing	is any operation performed on personal data, whether automated or not, such as the collection, storage, organization, retention, archiving, recording, viewing, modifying, adapting, querying, use, retrieval, forwarding, transmission or combination of personal data. Processing also includes disposing of, deleting, erasing, destroying or blocking personal data. Examples of processing include storing information in databases, remotely viewing information stored on another database or hosting personal data in the cloud.

8 RELATED DOCUMENTS / REFERENCES

Title	Number
Global Data Privacy Policy	GPP65-08
Information Management Policy	GPP65-02
Information Retention Schedule	GPP65-02.001
Data Subject Rights Procedure (Diebold Nixdorf as Processor)	GPP10-41
Data Subject Rights Procedure (Diebold Nixdorf as Controller)	GPP10-42
Privacy Notices (Employee privacy notice, website privacy notice and other privacy notices specific to certain processing activities)	

9 HISTORY

Revision	Date	Comment	By
1	11/2023	Original Version	Ethics and Compliance Officer