

Data Protection Guidelines for all STRABAG Group employees regarding the processing of image and/or audio recordings – Employee Information

I. General information

The data controller within the meaning of Article 4(7) of the GDPR is the relevant group company of the STRABAG Group (hereinafter 'STRABAG') which arranges for the recordings to be made and decides on the use of these recordings and your personal data. The name and contact address of the relevant Group company acting as the data controller can usually be found in the declaration of consent you have provided, the invitation to the event, or the notice regarding image and audio recordings at the relevant event.

II. Name and address of the Data Protection Officer

If you have any questions regarding our processing of your personal data or about data protection in general, please contact our Data Protection Officers and/or Data Protection Coordinators (data-protection-de@strabag.com). In any case, you may also contact the Group Data Protection Office at data-protection-group@strabag.com.

III. Personal data processed about you

Personal data is any information relating to an identified or identifiable natural person.

We process image and/or audio material using photographic, video and/or audio technology in which you are recognisable or identifiable and, depending on the camera used, also metadata such as the location and time of the image. The location is also frequently stored. Furthermore, we process any additional personal data that you may have provided to us for this purpose, such as your surname and first name.

IV. Scope of data processing and purposes of use

We process your personal data in order to make it available within our organisation and/or to third parties to the extent set out below and for the purposes stated.

1. Publication on the intranet

STRABAG publishes personal data as part of internal reporting and the presentation of the event for the purpose of informing staff on the 'STRANEXT' intranet and in the staff app.

2. Publication in business documents and print media

STRABAG publishes personal data for the purpose of informing staff and as part of its marketing and public relations activities, e.g. to provide information to business partners/media representatives or to attract new business contacts and staff, in business documents and print media (e.g. annual and interim reports, presentations, printed materials (e.g. hoardings and roll-ups), brochures, leaflets, trade magazines, construction site noticeboards, advertising and training materials, etc.) of the STRABAG Group.

3. Publication on the internet and disclosure to external media

STRABAG publishes personal data as part of its marketing and public relations activities, e.g. to provide information to business partners and media representatives, or to attract new business contacts and employees. This information is published on

STRABAG's website, and, where applicable, also on the websites of STRABAG SE's affiliated companies within the meaning of Section 15 German Stock Corporation Act (AktG), on social media platforms (e.g. Xing, LinkedIn, Facebook, Instagram, YouTube, Glassdoor, Kununu, whatchado, X, TikTok, Top Employer) as well as on external job boards and career platforms (e.g. Stepstone, Indeed, Karriere.at, Jobware). Furthermore, the data is passed on to external media (e.g. press, radio, television, online media).

4. Provision to affiliated companies of STRABAG SE

STRABAG makes personal data available to STRABAG SE group companies within the meaning of Section 15 German Stock Corporation Act (AktG) for publication to the extent specified above, as part of internal reporting for employee information purposes and as part of marketing and public relations activities, e.g. to inform business partners/media representatives or to acquire new business contacts and new employees.

V. Legal basis

If you represent STRABAG in public in accordance with your contractually agreed duties, e.g. as a press spokesperson, the processing of personal data is carried out on the basis of Article 6(1)(b) GDPR for the purpose of fulfilling the contract.

Where you represent STRABAG in public in accordance with your role, e.g. as a manager, or where STRABAG makes image and/or audio recordings of information events or corporate presentation events, such as trade fairs, construction site celebrations, topping-out ceremonies and inaugurations, construction site tours, 'open days', training courses or workshops, or of festive, sporting and cultural events in which the event itself is the main focus, the processing of personal data is carried out on the basis of Article 6(1)(f) GDPR, where this is necessary to safeguard our legitimate interests or those of a third party, and where, following a balancing test, we consider that your interests or fundamental rights and freedoms do not override the processing of personal data.

Where STRABAG takes portrait photographs, images and/or audio recordings of individuals or of you in the course of your professional activities, the processing of personal data is carried out on the basis of a declaration of consent provided by you in accordance with Article 6(1)(a) GDPR. You may withdraw your consent at any time with effect for the future.

VI. Recipients of the data

1. Access rights within our company

Within STRABAG, access to personal data in relation to the use of individual images is restricted to those persons who absolutely require such access to fulfil their roles and duties. This applies in particular to staff in the Press and Public Relations department.

The legal basis for data processing is Article 6(1)(a) GDPR, Article 6(1)(b) GDPR or Article 6(1)(f) GDPR.

2. Disclosure to external recipients

Furthermore, we disclose personal data to the following external recipients:

- Group companies of STRABAG SE within the meaning of Section 15 German Stock Corporation Act (AktG) and their employees.
- Data processors: service providers whom we engage to provide services or who are entrusted with the operation of our IT systems.

- Providers and users of social networks (e.g. Xing, LinkedIn, Facebook, Instagram, YouTube, Glassdoor, Kununu, whatchado, X, TikTok, Top Employer), external job boards and career platforms (e.g. Stepstone, Indeed, Karriere.at, Jobware) and external media (e.g. press, radio, television, online media).

The legal basis for data processing is Article 6(1)(a) GDPR, Article 6(1)(b) GDPR or Article 6(1)(f) GDPR.

VII. Data retention

We only store your data for as long as is necessary to fulfil the purpose for which it was collected and provided there is no other legal basis for continued processing, in particular statutory or contractual retention periods.

VIII. Data subjects' rights

To exercise your rights and if you wish to lodge a complaint regarding the processing of personal data, please feel free to contact our Data Protection Officers and/or Data Protection Coordinators (data-protection-de@strabag.com). You may also contact the Group Data Protection Office at data-protection-group@strabag.com.

Every data subject (natural person) has the following rights:

- Right of access (Art. 15 GDPR)
- Right to rectification of inaccurate data (Art. 16 GDPR)
- Right to erasure (Art. 17 GDPR)
- Right to restriction of processing of personal data (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- Right to lodge a complaint with a data protection supervisory authority (Art. 77 GDPR)

You may object at any time, without giving any reason, to the processing of personal data for the purposes of direct marketing; this also applies to profiling insofar as it is related to such direct marketing.

Furthermore, you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6(1)(f) GDPR. In this case, you must state the reasons for your objection, and we will no longer process your data unless our legitimate interests in processing it override yours.

Where data processing is based on consent, you may withdraw your consent at any time with effect for the future. Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal.

IX. Status / Updates

We adapt our privacy notice to reflect changes in functionality or legal circumstances. We therefore recommend that you review the privacy notice at regular intervals. Where your consent is required, changes will only be made with your consent.

Date: July 2026