



## Vishay Global Employee-Applicant-Independent Contractor Notice

**Effective Date:** April 2026

Vishay Intertechnology, Inc. and its affiliates, subsidiaries and related entities (collectively “**Vishay**”, “**we**”, “**us**” or “**our**”) are committed to respecting your privacy. This Global Employee / Applicant / Independent Contractor Notice (“**Notice**”) describes how we collect, use, disclose, store and otherwise process “**personal data**” or “**personal information**”, as defined by Data Protection Laws, when you apply for a job with Vishay and during and after your employment or engagement. “**Data Protection Laws**” shall mean all applicable data protection laws and regulations of the country and/or state in which you reside, including but not limited to Regulation (EU) 2016/679 (“**GDPR**”), any national law of an EU member state adopted pursuant to the GDPR, the United Kingdom Data Protection Act of 2018, the Switzerland Federal Act on Data Protection, the China Personal Information Protection Law (“**PIPL**”), the Singapore Personal Data Protection Act, and the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 and its implementing regulations (“**CPRA**”).

You may be entitled to additional rights provided under the applicable Data Protection Laws. For more information on such rights and how to exercise such rights, please refer to the relevant data privacy policy, rules, and regulations, or contact the relevant regional contact listed below.

If you are a California resident, you have additional rights afforded to you under the CPRA. For more information on such rights and how to exercise such rights, please refer to the section entitled “**California Residents**”.

### **I. Data Controller**

Each Vishay entity may collect, process, store, and/or transmit your personal data during your employment (including during any pre-employment recruiting processes), engagement, or collaboration with the respective Vishay entity. The relevant Vishay entity may be identified in your employment contract, individual independent contractor service agreement, and/or recruitment application forms. Nothing herein implies, creates, or constitutes any employment (including an offer for employment), agency, or service contract relationship between you and Vishay.

You may contact the following persons for any inquiries you may have in relation to the handling of your personal data by Vishay:

#### **For Europe:**

*Name:* Marina Heider

*Address:*  
Vishay Electronic GmbH  
Dr. Felix-Zandman-Platz 1  
95100 Selb  
Germany

*Email:* [privacy@vishay.com](mailto:privacy@vishay.com)

#### **For Asia:**

*Name:* Carol Chng

*Address:*  
Vishay Intertechnology Asia Pte.  
Ltd.  
37A Tampines Street 92  
#07-00  
Singapore 528886

*Email:* [privacy@vishay.com](mailto:privacy@vishay.com)

#### **For the United States and all other regions:**

*Name:* Franziska Eberius

*Address:*  
VISHAY BCcomponents  
BEYSCHLAG GmbH  
Rungholtstrasse 8-10  
25746 Heide, Germany Email:

[privacy@vishay.com](mailto:privacy@vishay.com)



## Vishay Global Employee-Applicant-Independent Contractor Notice

### II. Personal Data Collected, Used, Disclosed, Sold or Shared

We collect, use, and disclose the following categories of personal data regarding job applicants, employees and their emergency contacts and beneficiaries, and independent contractors. Collection may vary by region. Not all categories are collected in all regions.

Categories of Personal Information Collected	Purpose for Collection	Lawful Basis	Categories of Third Parties to whom the Personal Information is Disclosed
Name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, Email address, account name, social security number, driver's license number, passport number, or other similar identifiers	<ul style="list-style-type: none"> <li>• To evaluate an applicant's qualifications and suitability for employment;</li> <li>• To administer pre-employment and post-employment tests and training activity;</li> <li>• To complete the onboarding process;</li> <li>• To conduct criminal and other background checks on applicants and employees;</li> <li>• To manage the terms and conditions of employment, such as payment of wages/salary, direct deposit authorization, the provision and administration of benefits and leaves of absence and maintenance of emergency contact information;</li> <li>• To process work-related claims (e.g., insurance claims);</li> <li>• To prepare and maintain legally required records, such as I-9 forms, EEO-1 forms and affirmative action plans;</li> <li>• To provide a safe work environment;</li> <li>• To manage employee timekeeping;</li> <li>• To maintain information regarding training, disciplinary action, injuries and other employment history;</li> <li>• To ensure compliance with company policies and regulatory and legal requirements;</li> <li>• To meet tax obligations;</li> <li>• To detect security incidents, protect against malicious, deceptive, fraudulent, or</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Performance of Contract.</b> We may use your information to perform our obligations under your employment or engagement contract.</li> <li>• <b>Legitimate Interest.</b> We may use information for our legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms. For example, we may use your information to manage our recruitment and employment process effectively.</li> <li>• <b>Fulfillment of Legal Obligations.</b> We may use your information to comply with our legal obligations. To comply with regulations, laws or any authority requests, we may disclose your information to authorities or other officials or otherwise process your information pursuant to legal obligations we are subject to (e.g., retain certain Information according to tax or commercial laws, respond to your requests to exercise your rights under Data Protection Laws).</li> </ul>	<ul style="list-style-type: none"> <li>• Third-party service providers including, but not limited to, payroll processors, benefits administration providers and data storage or hosting providers as well as credit card vendors, travel agents and similar service providers who support the performance of your employment responsibilities.</li> <li>• Other members of our group of Companies</li> <li>• Government agencies or law enforcement to comply with legal obligations or valid legal processes such as search warrants, subpoenas or court orders and to protect our rights and property or protect the rights, property or safety of others</li> <li>• Buyers/acquirors in the event of a corporate transaction, including but not limited to a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.</li> </ul>



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Categories of Personal Information Collected	Purpose for Collection	Lawful Basis	Categories of Third Parties to whom the Personal Information is Disclosed
<p>Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information</p>	<p>illegal activity, and prosecute those responsible for that activity;</p> <ul style="list-style-type: none"> <li>To achieve other operational purposes for which the personal information was collected that are compatible with the context in which the personal information was collected and our employment or independent contractor relationship.</li> </ul>		
<p>Characteristics of protected classifications under California or federal law (race, color, national origin, religion, gender (including pregnancy), disability, age (at least 40 years old), citizenship status, sexual orientation, gender identity and gender expression)</p>			
<p>Biometric information</p>	<ul style="list-style-type: none"> <li>To manage employee timekeeping;</li> <li>To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity,</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate Interest</li> <li>Fulfillment of Legal Obligations</li> </ul>	



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	<p>and prosecute those responsible for that activity;</p> <ul style="list-style-type: none"> <li>To achieve other operational purposes for which the personal information was collected that are compatible with the context in which the personal information was collected and our employment or independent contractor relationship.</li> </ul>		
<p>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding interaction with an internet web site, application, or advertisement</p>	<ul style="list-style-type: none"> <li>To provide our website to you;</li> <li>To operate and personalize the products we offer, and to give each user a more consistent and personalized experience when interacting with us;</li> <li>To personalize our marketing communications, and to deliver advertisements about our products and services that we think may interest you;</li> <li>To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity;</li> <li>To achieve other operational purposes for which the personal information was collected that are compatible with the context in which the personal information was collected and our Employment or independent contractor relationship.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate Interest</li> <li>Fulfillment of Legal Obligations</li> </ul>	<ul style="list-style-type: none"> <li>Third-party service providers including, but not limited to, payroll processors, benefits administration providers and data storage or hosting providers as well as credit card vendors, travel agents and similar service providers who support the performance of your employment responsibilities.</li> <li>Third-party website analytics and digital advertising service providers.</li> <li>Other members of our group of Companies</li> <li>Government agencies or law enforcement to comply with legal obligations or valid legal processes such as search warrants, subpoenas or court orders and to protect our rights and property or protect the rights, property or safety of others</li> <li>Buyers/acquirors in the event of a corporate transaction, including but not limited to a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.</li> </ul>



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<p>Audio, electronic, visual, thermal, olfactory, or similar information</p>	<ul style="list-style-type: none"> <li>• To complete the onboarding process;</li> <li>• To provide a safe work environment;</li> <li>• To manage employee timekeeping;</li> <li>• To maintain information regarding training, disciplinary action, injuries and other employment history;</li> <li>• To ensure compliance with company policies and regulatory and legal requirements;</li> <li>• To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity;</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of Contract</li> <li>• Legitimate Interest</li> <li>• Fulfillment of Legal Obligations</li> </ul>	<ul style="list-style-type: none"> <li>• Third-party service providers including, but not limited to, payroll processors, benefits administration providers and data storage or hosting providers as well as credit card vendors, travel agents and similar service providers who support the performance of your employment responsibilities.</li> <li>• Other members of our group of Companies</li> <li>• Government agencies or law enforcement to comply with legal obligations or valid legal processes such as search warrants, subpoenas or court orders and to protect our rights and property or protect the rights, property or safety of others</li> <li>• Buyers/acquirors in the event of a corporate transaction, including but not limited to a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.</li> </ul>
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Categories of Personal Information Collected	Purpose for Collection	Lawful Basis	Categories of Third Parties to whom the Personal Information is Disclosed
	<ul style="list-style-type: none"> <li>To achieve other operational purposes for which the personal information was collected that are compatible with the context in which the personal information was collected and our employment or independent contractor relationship.</li> </ul>		
Professional or employment-related information	<ul style="list-style-type: none"> <li>To evaluate an applicant's qualifications and suitability for employment;</li> <li>To administer pre-employment and post-employment tests and training activity;</li> <li>To complete the onboarding process;</li> <li>To conduct criminal and other background checks on applicants and employees;</li> <li>To prepare and maintain legally required records, such as I-9 forms, EEO-1 forms and affirmative action plans;</li> <li>To maintain information regarding training, disciplinary action, injuries and other employment history;</li> <li>To ensure compliance with company policies and regulatory and legal requirements;</li> <li>To achieve other operational purposes for which the personal information was collected that are compatible with the context in which the personal information was collected and our employment or independent contractor relationship.</li> </ul>		
Education information			
Audio Recording and Transcription in Microsoft Teams Meetings: audio and/or	<ul style="list-style-type: none"> <li>To document meetings, generate minutes, or otherwise for specified business and compliance purposes</li> </ul>	Consent	<ul style="list-style-type: none"> <li>Microsoft</li> <li>Other members of our group companies</li> </ul>



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<p>video of spoken contributions, names and profiles of participants, chat contents, timestamps, and the textual transcription of discussions. Depending on configuration, video images and screen sharing may also be captured.</p>			
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## Vishay Global Employee-Applicant-Independent Contractor Notice

We collect, use and disclose the following categories of “sensitive personal information” or “special categories of personal data” as defined by Data Protection Laws regarding applicants, employees and their emergency contacts and beneficiaries, and independent contractors. Collection may vary by region. Not all categories are collected in all regions.

Categories of Personal Information Collected	Purpose for Collection	Lawful Basis	Categories of Third Parties to whom the Personal Information is Disclosed
Personal information that reveals social security, driver's license, state identification card, or passport number	<ul style="list-style-type: none"> <li>• To evaluate an applicant's qualifications and suitability for employment;</li> <li>• To complete the onboarding process;</li> <li>• To conduct criminal and other background checks on applicants and employees;</li> <li>• To manage the terms and conditions of employment, such as wages/salary, direct deposit authorization, the provision and administration of benefits and leaves of absence and maintenance of emergency contact information;</li> <li>• To process work-related claims (e.g., insurance claims);</li> <li>• To prepare and maintain legally required records, such as I-9 forms, EEO-1 forms and affirmative action plans;</li> <li>• To ensure compliance with company policies and regulatory and legal requirements;</li> <li>• To meet tax obligations;</li> <li>• To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity;</li> <li>• To achieve other operational purposes for which the personal information was collected that are compatible with the context in which the personal information was collected and our employment or</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Performance of Contract.</b> We may use your information to perform our obligations under your employment or engagement contract.</li> <li>• <b>Legitimate Interest.</b> We may use information for our legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms. For example, we may use your information to manage our recruitment and employment process effectively.</li> <li>• <b>Fulfillment of Legal Obligations.</b> We may use your information to comply with our legal obligations. To comply with regulations, laws or any authority requests, we may disclose your information to authorities or other officials or otherwise process your information pursuant to legal obligations we are subject to (e.g., retain certain information according to tax or commercial laws, respond to your requests to exercise your rights under Data Protection Laws).</li> </ul>	<ul style="list-style-type: none"> <li>• Third-party service providers including, but not limited to, payroll processors, benefits administration providers and data storage or hosting providers as well as credit card vendors, travel agents and similar service providers who support the performance of your employment responsibilities</li> <li>• Other members of our group of companies</li> <li>• Government agencies or law enforcement to comply with legal obligations or valid legal processes such as search warrants, subpoenas or court orders and to protect our rights and property or protect the rights, property or safety of others</li> <li>• Buyers/acquirors in the event of a corporate transaction, including but not limited to a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy</li> </ul>



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Categories of Personal Information Collected	Purpose for Collection	Lawful Basis	Categories of Third Parties to whom the Personal Information is Disclosed
<p>Personal information that reveals account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account</p>	<p>Independent contractor relationship.</p> <ul style="list-style-type: none"> <li>• To complete the onboarding process;</li> <li>• To manage the terms and conditions of employment, such as payment of wages/salary, direct deposit authorization, the provision and administration of benefits and leaves of absence and maintenance of emergency contact information;</li> <li>• To achieve other operational purposes for which the personal information was collected that are compatible with the context in which the personal Information was collected and our employment or independent contractor relationship.</li> </ul>		
<p>Personal information that reveals racial or ethnic origin, religious or philosophical beliefs or union membership</p>	<ul style="list-style-type: none"> <li>• To complete the onboarding process;</li> <li>• To conduct criminal and other background checks on applicants and employees;</li> <li>• To prepare and maintain legally required records, such as EEO-1 forms and affirmative action plans;</li> <li>• To ensure compliance with company policies and regulatory and legal requirements;</li> <li>• To achieve other operational purposes for which the personal information was collected that are compatible with the context in which the personal information was collected and our employment or Independent contractor relationship.</li> </ul>		



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Categories of Personal Information Collected	Purpose for Collection	Lawful Basis	Categories of Third Parties to whom the Personal Information is Disclosed
Biometric information for the purpose of uniquely identifying an applicant, employee or independent contractor	<ul style="list-style-type: none"> <li>• To manage employee timekeeping;</li> <li>• To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and Prosecute those responsible for that activity;</li> <li>• To achieve other operational purposes for which the personal information was collected that are compatible with the context in which the personal information was collected and our employment or Independent contractor relationship.</li> </ul>		
Personal information collected and analyzed concerning the health of an employee, applicant, or independent contractor	<ul style="list-style-type: none"> <li>• To complete the onboarding process;</li> <li>• To manage the terms and conditions of employment, such as payment of wages/salary, direct deposit authorization, the provision and</li> </ul>		
Personal information collected and analyzed concerning an employee, applicant, or independent contractor's sex life or sexual orientation	<ul style="list-style-type: none"> <li>administration of benefits and leaves of absence and maintenance of emergency contact information;</li> <li>• To process work-related claims (e.g., insurance claims);</li> <li>• To ensure compliance with company policies and regulatory and legal requirements;</li> <li>• To achieve other operational purposes for which the personal information was collected that are Compatible with the context in which the personal information was collected and our employment or independent contractor relationship.</li> </ul>		



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Vishay does not have actual knowledge that it sells personal data. The personal data, including the sensitive personal information, described above are collected directly from you when you apply for employment and during your employment or from other sources such as benefit providers, third parties for reference checks (e.g., past employers), recruitment agencies, background check agencies, timekeeping software, internal or third-party tracking of usage of Vishay email and telephone systems and computer networks, public agencies (e.g., local authorities, government authorities, tax authorities, the California Department of Fair Employment and Housing, the California Labor Commissioner, the California Occupational Safety Administration, and if applicable to the position, the California Department of Motor Vehicles), workers' compensation carriers, law enforcement agencies and litigation.

We use the personal information, including the sensitive personal information, described above only for business purposes related to your employment, application for employment, or independent contractor relationship. We do not sell your personal information for monetary consideration. However, we do use cookies, web beacons/pixels and other tracking technologies on our publicly-facing website, as described in our [Privacy Policy](#). The collection of data through certain tracking technologies, including for our targeting advertising purposes, may be considered a "sale" and "sharing" under Data Protection Laws. This data collection is not directly related to your relationship to Vishay as an employee, job applicant or independent contractor but may be collected from any user of our websites generally as set forth in our general [Privacy Policy](#). To opt-out of having your information sold and or shared with third-party website analytics and digital advertising service providers, visit our "Do Not Sell or Share My Personal Information" web page. Vishay does not have actual knowledge that it sells or shares such information of children under 18 years of age.

### III. Security and Retention

We employ physical, technical, and organizational security measures designed to protect your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and third parties that have a legitimate need for such access for any or all of the Purposes stated above and which are compliant with the relevant laws and regulations.

Please note, however, that the security of any information transmitted through the Internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the Internet or for changes to or losses of data. You are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our websites, including our Career pages and Intranet. To protect us, you, and your data, we may suspend your use of our websites, without notice if any breach of security is suspected. Access to and use of password protected and/or secure areas of our websites are restricted to authorized users only. Unauthorized access to such areas is prohibited.

We will retain the personal data, including sensitive personal information, described above as long as necessary to fulfill the purpose for which it was collected, or as required by applicable laws or regulation.

### IV. Cross Border Transfers

When permitted by applicable law, we may transfer the personal data we collect about you to the United States and other jurisdictions to administer our employment relationship, perform our employment contract with you and for the purposes set out in this Notice. These jurisdictions may not provide the same level of data protection as Data Protection Laws in your home country. We will transfer your personal data through the use of appropriate safeguards as required by Data Protection Laws.



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### V. Your Rights

Under the Data Protection Laws, you may have the following privacy rights, which you may exercise by contacting us at [privacy@vishay.com](mailto:privacy@vishay.com):

**Right of Access.** You have the right to obtain confirmation as to whether your personal data is being processed, as well as access to the personal data along with certain information, including the purposes of the processing, the categories of personal data concerned and the recipients or categories of recipients to whom the personal data have been or will be disclosed.

**Right to Rectification.** You have the right to rectify your inaccurate personal data and to complete any incomplete personal data, including by means of providing a supplementary statement.

**Right to Erasure or Right to be Forgotten.** You have the right to erase your personal data under certain circumstances.

**Right to Restrict Processing.** You have the right to restrict our processing of your personal data under certain circumstances.

**Right to Object.** You have right to object, on grounds relating to your particular situation, at any time to our processing of your personal data, which is based on public interest or our legitimate interests, including the profiling of data. In this case, we will stop processing your data, except for where we have compelling legal grounds for the processing which override your interests, rights and freedoms, or for the exercise or defence of possible legal claims. You also have a right to object to the processing of your personal data for direct marketing purposes.

**Right to Data Portability.** Under certain circumstances, you have the right to receive your personal data that you provided to us in a structured, commonly used and machine-readable format, and have the right to transmit such data to another controller without hindrance from us.

**Right to Withdraw Consent.** If you have provided us with your consent for the processing of your personal data, you may withdraw your consent with effect for the future at any time to stop any further processing.

**Right to Lodge a Complaint.** You have a right to lodge a complaint with a supervisory authority if you believe that our processing of your personal data violates the Data Protection Laws. Contact information for European supervisory authorities can be found [HERE](#).

### VI. California Residents

As a California resident, you have the following rights under the CPRA.

**Right to Know.** You have the right to request that we disclose certain information to you about our collection and use of certain personal information, including sensitive personal information, about you as described below:

- The specific pieces of personal information collected;
- The categories of personal information collected;
- The categories of sources from whom the personal information is collected;
- The purpose for collecting, selling or sharing the personal information;
- The categories of third parties with whom we have disclosed the personal information;
- The categories of personal information that we have sold or shared, and the categories of third parties to whom the personal information was sold or shared, by category or categories of personal information for each third party to whom the personal information was sold or shared;
- The categories of personal information that we disclosed for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

**Right to Delete.** You have the right to request that we delete your personal information, subject to certain exceptions.



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**Right to Correct Inaccurate Personal Information.** You have the right to request that we correct inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

**Right to Opt-Out of Sale or Sharing.** As stated above, Vishay does not sell your personal information for monetary consideration. However, we do use cookies, web beacons/pixels and other tracking technologies on our publicly-facing website, as described in our [Privacy Policy](#). The collection of data through certain tracking technologies, including for our targeting advertising purposes, may be considered a “sale” and “sharing” under Data Protection Laws. This data collection is not directly related to your relationship to Vishay as an employee, job applicant or independent contractor but may be collected from any user of our websites generally as set forth in our general [Privacy Policy](#). To opt-out of having your information sold and or shared with third-party website analytics and digital advertising service providers, visit our “Do Not Sell or Share My Personal Information” web page..

**Right to Limit the Use and Disclosure of Sensitive Personal Information for Certain Purposes.** Vishay does not use or disclose the above sensitive personal information for any purpose other than those permitted under the CPRA.

**Freedom from Discrimination.** You have the right not to receive discriminatory treatment for exercising your rights above, including not to be retaliated against for exercising such rights.

To exercise the rights above, you must submit a verifiable request to us by calling us at 1-888-354-1131 or submitting a request online at [LINK](#). To submit a verifiable request, you will be asked to provide certain information to help us verify your identity. The information we ask you to provide to initiate a request may differ depending upon the type of request, the type, sensitivity and value of the personal data that is the subject of the request, and the risk of harm to you that may occur as a result of unauthorized access or deletion, among other factors.

If we cannot verify your identity or authority to make the request, we will not be able to comply with your request. We will inform you if we cannot verify your identity or authority. We will only use personal information provided in a verifiable request to verify the requestor’s identity or authority to make the request.

You may designate an authorized agent to make a request on your behalf by providing the agent with signed written permission to do so.

The following categories of personal information were sold or shared in the twelve (12) months prior to the effective date of this Notice:

- Identifiers, such as unique personal identifier, online identifier, Internet Protocol address, or other similar identifiers.
- Internet or other electronic network activity information, such as data collected through the <https://jobs.vishay.com/> site as noted through the cookie banner upon collection. This includes information associated with your browser behavior as it pertains to your employment application. Please see our [general Privacy Policy](#).
- Geolocation data.

Such information is sold to or shared with our third-party website analytics and digital advertising service providers.

We share or sell such information:

- To provide our website to you;
- To operate and personalize the products we offer, and to give each user a more consistent and personalized experience when interacting with us;
- To personalize our marketing communications, and to deliver advertisements about our products and services that we think may interest you;
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity;
- To achieve other operational purposes for which the personal information was collected that are compatible with the context in which the personal information was collected and our Employment or independent contractor relationship.



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### VII. Data processing within the EEA

#### Our legal bases for the categories of personal data processed:

If you are a resident of the EU / EEA, we process personal data in connection with your employment for the purposes stated. We only process personal data that is permitted under the GDPR and national law (such as the German Federal Data Protection Act). As indicated, some of the listed data may not be processed in your region (e.g. if only relevant for US employees).

We base the processing of data for the purpose of handling the employment relationship in the context of its establishment, implementation and termination to the extent permitted on the following purposes and legal bases:

- **Establishment, implementation and termination of the employee relationship:**

The primary legal basis for this is Art. 6 (1) b) in conjunction with Art. 88 (1) GDPR in conjunction with the relevant national provision (e.g. Section 26 (1) of the BDSG for Germany). In addition, collective agreements pursuant to Art. 6 (1) b) in conjunction with Art. 88 (1) GDPR in conjunction with the relevant national provision (e.g. Section 26 (4) BDSG for Germany) as well as any consent granted pursuant to Art. 6 (1) a), 7 GDPR in conjunction with the relevant national provision (e.g. Section 26 (2) BDSG for Germany) may be used as a legal basis. Where existing, data processing for the purpose of investigating criminal offenses is carried out on the legal basis of the relevant national provision (e.g. Section 26 (1) sentence 2 BDSG for Germany) or Art. 6 (1) lit. b or f GDPR in lack of any national deviation in conjunction with Art. 88 GDPR. Other compliance-related processing activities are usually based on Art. 6 (1) lit. f GDPR (or another relevant legal provision in conjunction with Art. 88 GDPR such as Art. 26 (1) sentence 1 BDSG), e.g. internal investigation of severe violations of obligations arising from the employment, unless otherwise indicated below. For this purpose personal data from the following categories is typically used if necessary to fulfill such purpose (pls see "II. Personal Data Collected, Used, Disclosed, Sold or Shared"):

Employee Master Data, Work contract and position related data, Work performance related information, Education, training and HR development related information, Communication / System Use Data, Other sensitive personal information

- **Fulfillment of legal obligations as an employer, in particular in the area of tax and social security law:** These types of processing activities are usually based on Art. 6 (1) c) GDPR in conjunction with the applicable EU or national provisions (e.g. Section 26 BDSG in conjunction with the relevant special legal provisions for Germany). In some cases, there are also legal obligations to disclose data to third parties (e.g. authorities and courts). This data processing is based on Art. 6 (1) c) GDPR in conjunction with the relevant special legal provisions.

For this purpose personal data from the following categories is typically used if necessary to fulfill such purpose (pls see "II. Personal Data Collected, Used, Disclosed, Sold or Shared"):

Employee Master Data, Work contract and position related data, Work performance related information (such as occupational safety instruction related information), Education, training and HR development related information (such as training and certificate information for employee security trainings), Communication / System Use Data (e.g. for IT security relevant assessments), Other sensitive personal information (such as passport or social security number for official notifications)

- **Fulfillment of legitimate interests:** This is done on the basis of Art. 6 (1) f) GDPR in order to safeguard legitimate interests of us or of third parties (e.g. authorities). This applies in particular to the implementation of (preventive) compliance measures, ensuring IT security and IT operations, building and facility security measures (e.g. access controls), measures to ensure house rights, the processing of data for statistical purposes (e.g. for business planning purposes) or data processing for purposes of corporate management, internal communication and other administrative purposes. In addition, we are required by law to use personal data for compliance checks, the implementation of which may constitute a legitimate interest (e.g., anti-terrorism regulations 2580/2001 and 881/2002 and "sanctions list" checks).



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For this purpose personal data from the following categories is typically used if necessary to fulfill such purpose (pls see "II. Personal Data Collected, Used, Disclosed, Sold or Shared"):

Employee Master Data, Work contract and position related data, Work performance related information (such as production related information, production data acquisition, condition quality inspection for business analytics and reporting), Education, training and HR development related information (such as information for HR development purposes, appraisals), Communication / System Use Data (e.g. for IT security checks, CCTV, security monitoring via SIEM/SOC platform (SOCaS/Adaptive MxDR)).

As part of its IT security operations, Vishay uses a cloud-based Security Information and Event Management (SIEM) and Managed Detection and Response (MDR) service ("SOCaS – Adaptive MxDR"), operated by Accenture International Limited as a data processor. The service processes technical log data (user identifiers, device identifiers, IP addresses, access logs, and security event metadata) solely for the purpose of detecting, investigating, and responding to cyber security threats. No content data (e-mails, files, messages) is processed. Access to log data is restricted to Vishay's Global IT Security team (GSEC) and authorized Accenture SOC analysts. Log data is hosted in the EU (Google Cloud, Spain) and retained for a maximum of 12 months. The service does not serve any HR, performance management, or disciplinary purposes. Further information is available from the Data Privacy Office Europe.

**Change in purpose:** To achieve other operational purposes not explicitly mentioned in here that are compatible with the context in which the personal information was collected and our employment or independent contractor relationship. Such processing will take place observing all data protection law requirements (e.g. proper information on such purposes before the processing takes place, implementing proper safeguards etc.; cf. Art. 6 (4) GDPR)

### Our legal basis for processing special categories of personal data

We process special categories of personal data pursuant to Art. 9 (1) GDPR within the scope of the employment relationship for the purpose of exercising rights or fulfilling legal obligations under labor law, social security law and social protection law (e.g., providing health data to the health insurance fund, recording severe disability due to additional leave and determining the severely disabled person's levy). This is done on the basis of Art. 9 (2) b) GDPR in conjunction with Article 6 GDPR and any applicable national provisions (e.g. 26 (3) BDSG in Germany). In addition, the processing of health data may be necessary for the assessment of your ability to work pursuant to Art. 9 (2) h) GDPR in conjunction with Art. 6 GDPR and any applicable national provisions (e.g. Section 22 (1) b) BDSG for Germany). In addition, the processing of special categories of personal data may be based on Art. 9 (2) f) GDPR (assertion, exercise or defense of legal claims) or on consent pursuant to Art. 9 (2) a) GDPR in conjunction with Art. 6 GDPR and any applicable national provisions (e.g. Section 26 (2) BDSG for Germany).

In this context personal data from the following categories is typically used if necessary to fulfill such purpose (pls see "II. Personal Data Collected, Used, Disclosed, Sold or Shared"):

Employee Master Data, Special categories of personal data and other data from other categories as associated to it in the relevant context (e.g. Work contract and position related data).

### Data transfer to third parties

We may disclose your personal data to the following recipients or categories of recipients.

We may transfer your personal data to other recipients outside the company or group of companies to the extent necessary to fulfill our contractual and legal obligations as an employer.

These may be, among others:

- Authorities, insurance carriers, insurance utilities, courts or similar.
- Banks
- Third party debtor in case of wage and salary garnishment

Furthermore, we may pass on your data to service providers for processing (e.g. to tax consultants, technical service providers or business partners such as travel agencies, hotels, airlines ect.).



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Further, we may transfer personal data within the company group amongst others for the purpose of operating central business processes such as payroll, HR management, performance review and assessment, promotion decisions and HR development, HR compliance measures and internal investigations, internal departmental reporting, joint project management and operation of group wide IT systems and applications. Personal data of EU employees in these cases are mostly processed by Vishay Intertechnology, Inc. 63 Lancaster Avenue Malvern, PA 19355-2143 in the USA as well as Vishay Electronic GmbH, Dr.-Felix-Zandman-Platz 1, 95100 Selb.

### Data processing outside the EU / EEA

If we transfer personal data within the company or to third parties in third countries that are not part of the European Economic Area, the transfer will only take place if the third country has been confirmed by the EU

Commission to have an adequate level of data protection or if other legal protection mechanisms are in place. To the extent that personal data is processed in the U.S., the processing takes place in an insecure third country where, according to European courts and supervisory authorities, there is no level of data protection comparable to that in the EU and there may potentially be access to data by law enforcement authorities and other public bodies that may not be fully in line with requirements that exist in the EU countries for such cases. We use appropriate safeguards to achieve an adequate level of data protection outside the EU. As an adequate protection mechanism for the transfer of personal data to third parties outside the EEA we conclude EU standard contractual clauses. To the extent that data is transferred to third countries within the corporate group, corporate policy applies as well. In all other cases, data is only transferred insofar as standard contractual clauses have been concluded in the respective valid version. The EU standard contractual clauses can be accessed here: Standard Contractual Clauses (SCC) (europa.eu). Upon request, we will provide further information on the contracts concluded.

### Duration of data storage

We limit the storage of your data so that we delete it after termination of the employment relationship as soon as it is no longer required, unless a longer retention period is required or permitted by law (e.g. in accordance with the principles of proper, IT-based accounting systems (GoBS)). Accordingly, employment contracts must be stored for up to six years, other documents such as invoicing documents, payroll tax documents, annual financial statements and payroll lists for ten years, and other data for even longer if necessary (e.g. in the case of pension claims for up to 30 years). As a rule, the data in the personnel file are deleted 3 years after termination of the employment relationship. Employment-related data is retained for as long as claims may arise from or in connection with the employment relationship (generally within the framework of the applicable statutory limitation periods, which may be between 3 and 10 years, depending on the claim). Personal data are deleted in any case if they are no longer needed and there are no requirements that prevent deletion.

### Your rights as a data subject

As a data subject, you have the right under the DS-GVO

- to request information about your personal data processed by us in accordance with Art. 15 GDPR
- pursuant to Art. 16 GDPR, to demand the correction of inaccurate or incomplete personal data stored by us without undue delay;
- pursuant to Art. 17 GDPR, to request the deletion of your personal data stored by us;
- in accordance with Art. 18 DS-GVO, to request the restriction of the processing of your personal data;
- pursuant to Art. 20 DS-GVO, to receive your personal data that you have provided to us in a structured, common and machine-readable format or to request the transfer to another controller;

#### **to object to the processing of your personal data in accordance with Art. 21 GDPR**

- in the event that consent has been given, to revoke consent once given to us at any time in accordance with Art. 7 (3) DS-GVO. This has the consequence that we may no longer continue the processing based on this consent for the future without affecting the lawfulness of the processing carried out on the basis of the consent until the revocation;
- to lodge a complaint with a supervisory authority pursuant to Art. 77 GDPR.



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You can find the responsible supervisory authorities here: [Our Members | European Data Protection Board \(europa.eu\)](#)

Purpose for Collection	Categories of Personal Information Collected	Lawful Basis	Categories of Third Parties to whom the Personal Information is Disclosed
<ul style="list-style-type: none"> <li>• To evaluate an applicant's qualifications and suitability for employment;</li> <li>• To administer preemployment and post-employment tests and training activity;</li> <li>• To complete the onboarding process;</li> <li>• To manage the terms and conditions of employment, such as payment of wages/salary, direct deposit authorization, the provision and administration of benefits and leaves of absence, special security and insurance, tax-related obligations and maintenance of emergency contact information;</li> <li>• To process work related claims (e.g., insurance claims);</li> <li>• To prepare and maintain legally</li> </ul>	<p><u>Employee Master Data:</u> Name, alias, postal address, unique personal identifier, social security number, telephone number, passport number (if needed for travel activities), insurance policy number, bank account number, credit card number, debit card number, or any other financial information</p> <p><u>Work contract and position related data:</u> contract number, type of employment, start / end date, position, superior, workplace, management level and category, unit</p> <p><u>Work performance related information:</u> Driver's license or state identification card number (if needed for actual position or in a specific country), signature sample (if needed for actual position, e.g. for management), business trip related information, production related information such as shift schedules, quality inspections, occupational safety instructions, production data acquisition, data on workplace equipment and condition, data on billing for use of the canteen and</p>	<p><b>Performance of Contract</b> We may use your information to perform our obligations under your employment or engagement contract.</p> <p><b>Legitimate Interest</b> We may use information for our legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms. For example, we may use your information to manage our recruitment and employment process effectively.</p> <p><b>Fulfillment of Legal Obligations</b> We may use your information to comply with our legal obligations. To comply with regulations, laws or any authority requests we may disclose your information to authorities or other officials or otherwise process your information pursuant to legal obligations we are subject to (e.g., retain certain information according to tax or</p>	<ul style="list-style-type: none"> <li>• Third-party service providers including, but not limited to, payroll processors, benefits administration providers and data storage or hosting providers as well as credit card vendors, travel agents and similar service providers who support the performance of your employment responsibilities</li> <li>• Other members of our group of companies</li> <li>• Government agencies or law enforcement to comply with legal obligations or valid legal processes such as search warrants, subpoenas or court orders and to protect our rights and property or protect the rights, property or safety of others</li> <li>• Buyers/acquirors in the event of a corporate transaction, including but not limited to a divestiture, merger,</li> </ul>



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Purpose for Collection	Categories of Personal Information Collected	Lawful Basis	Categories of Third Parties to whom the Personal Information is Disclosed
<p>required records, such as I-9 forms, EEO-1 forms and affirmative action plans;</p> <ul style="list-style-type: none"> <li>• To provide a safe work environment;</li> <li>• To manage employee timekeeping;</li> <li>• To meet other statutory documentation, reporting or tax-related obligations;</li> <li>• To conduct criminal and other background checks on applicants and employees;</li> <li>• To maintain information regarding training, disciplinary action, injuries and other employment history;</li> <li>• To ensure compliance with company policies and regulatory and legal requirements;</li> <li>• To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity</li> </ul>	<p>allocation of key card for building access, photography for company badge / internet / intranet, image and video material for company videos / newspapers / company media / intranet, other audio, electronic, visual, thermal, olfactory, or similar information (if necessary for the indicated purposes)</p> <p><u>Education, training and HR development related information:</u> CV, education / training incl documentation / certificates, employment history, records of personnel interviews including those on personnel development measures (performance appraisals, target agreements, data on the calculation of bonus payments, training history),</p> <p><u>Communication / System Use Data:</u> Online identifier, Internet Protocol address, email address, account name, internal as well as external correspondence which are stored in the respective IT and communication systems of the company (e.g. an enterprise resource planning system, ERP or CRM system, support/ticket system or the email account) together with associated data for system use (e.g. user name), video recordings (CCTV), internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding</p>	<p>commercial laws, respond to your requests to exercise your rights under Data Protection Laws).</p>	<p>consolidation, or asset sale, or in the unlikely event of bankruptcy</p>



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Purpose for Collection	Categories of Personal Information Collected	Lawful Basis	Categories of Third Parties to whom the Personal Information is Disclosed
	<p>interaction with an internet web site, application, or advertisement</p> <p><u>Special categories of personal data:</u> health related information such as sick leave / sickness, medical information, or health insurance information, disability, personal information that reveals racial or ethnic origin, religious or philosophical beliefs or union membership, sex life or sexual orientation, biometric information incl. physical characteristics or description for the purpose of uniquely identifying an employee or independent contractor (e.g. for access control)</p> <p><u>Other sensitive personal information:</u> Personal information that reveals social security, state identification card, or passport number, personal information that reveals account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account</p> <p><u>Characteristics of protected classifications under California or federal US law:*</u> race, color, national origin, religion, gender (including pregnancy), disability, age (at least 40 years old), citizenship status, sexual orientation, gender identity and gender expression</p>		

\* Unless previously described, corresponding data of employees in the EU are not processed



## Vishay Global Employee-Applicant- Independent Contractor Notice

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### VIII. Changes to this Notice

We reserve the right to update this Notice at any time. Any changes to this Notice will be posted to this web page so that you are always aware of the information we collect and how we use it. Accordingly, please refer back to this web page frequently as it may change.

If we would like to use your previously collected personal data for purposes other than those we notified you about at the time of collection, we will provide you with notice and, when required by Data Protection Laws, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent when required by applicable law or regulation. For further information on how Vishay processes data, see the [Privacy Policy](#)