

Data Privacy Notice

The Magna Hotline

Introduction

This site is a confidential online reporting system provided by Magna to allow people to report suspected violations of Magna's Code of Conduct and Ethics, Magna's Code of Conduct, the Employee's Charter or other concerns about questionable business practices within Magna or its suppliers. If you are a Magna Employee, you are encouraged to report suspected violations directly to your manager, Human Resources, Internal Audit or Magna's VP Ethics and Chief Compliance Officer. If you feel that you are unable to do so, you may use the online reporting system to make your report. The use of this site is entirely voluntary. Before submitting a report, you are asked to read this Data Privacy Notice carefully.

If your concern pertains to a matter that, under local law, may not be accepted by Magna through this online reporting system and is therefore not listed as a reportable item in the report form, we ask that you report the matter directly to your manager, Human Resources, Internal Audit or Magna's VP Ethics and Chief Compliance Officer if you are a Magna employee.

We ask that any information you provide be factual to the best of your knowledge. You will not be subject to retaliation from Magna for any report of a suspected violation that is made in good faith, even if it later turns out to be incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated. The information you submit is voluntary, will be treated confidentially and we encourage you, even if you can submit the information anonymously, to identify yourself for us to follow up with questions we may have.

Magna will review the information you provide and may conduct an investigation. All ethics concerns are investigated in accordance with the Policy on Processing of Ethics Reports and Ethics Investigation Procedures. All Employee's Charter concerns are investigated in accordance with the Global Magna Hotline Policy & Guidelines. Your cooperation and assistance may be necessary if an investigation is conducted. Based on the results of the investigation, Magna will take such action as it determines appropriate under the circumstances.

Collection, Processing and Use of Your Personal Data

Magna respects your privacy and is committed to complying with applicable privacy laws in those jurisdictions where we do business. In connection with this online reporting system, Magna asks you to provide certain information about yourself and the incident you wish to report ("Personal Data"). Magna collects, processes, and uses the information which you provide in your report, including Personal Data, pursuant to the terms set out below. If you prefer, you can issue a report anonymously where permitted by local law.

1. Controller

Magna International Inc.
337 Magna Drive
Aurora, Ontario, Canada L4G 7K1
Authorized signatory: Chief Compliance Officer

2. Data Privacy Team

For questions on Data Privacy, please reach out to:
All countries (other than Brazil): dataprivacy@magna.com
Brazil: privacidade.dados@magna.com

3. Legal Basis

The processing is necessary for the purposes of the legitimate interests pursued by Magna or by a third party. If applicable law requires explicit consent for processing, Magna will process your data based on your consent. If applicable law provides another legal basis, such as Magna's legal obligation to ensure and adhere to an effective compliance system, the processing will be based on that legal obligation.

4. Data Categories and Purpose of Use

The collection, processing and use of your Personal Data may involve in particular the following data categories:

- If you have provided us with the information voluntarily:
 - Your core data (your full name, relationship to Magna, position title, geographic location, position classification),
 - Your contact data (email address, phone number, preferred time for contact),
- The description of the suspected violation based on your perception, including name and title of all individuals you may be reporting and all relevant facts and details.
- In some cases, the report may include sensitive data (e.g., health data if report relates to workplace injuries).

The purpose of the processing of the Personal Data is based on revealing and investigating misconduct and accumulate evidence with respect to Laws, Magna Code of Conduct, Magna Supplier Code of Conduct, Magna Employee Charter and corresponding policies and procedures, as far as permissible under applicable law, in order to prevent damages to Magna and third parties. This also presents the legitimate interest of the processing of the Personal Data.

5. Access to your Personal Data

After filing a report, you will be able to access the Personal Data you made available and have option to request that such data be corrected or deleted, subject to applicable law and Magna policies.

Unless otherwise required by law, the information within the online reporting system's database may only be reviewed and used by those authorized individuals who need to access the data to fulfill their job duties. These individuals may include Magna employees of various legal entities within the Magna group, including in the Legal, Compliance, Internal Audit, Corporate Security, IT and Human Resources Departments.

As needed, Magna engages external service providers whose staff will have access based on a need-to-know basis:

- For operating the online reporting system, for hosting on servers and technical support, Magna currently cooperates with the service provider NAVEX Global, Inc., 500 Meadows Road, Suite 500, Lake Oswego, Oregon, 97035, USA ("Navex").

Individuals whom you identify through a Magna Hotline report may be informed about the fact that a report has been made about them if required by applicable laws. However, to the extent reasonably possible, Magna will not reveal your name or identity. All individuals who you identify through a report will have the opportunity to respond to or correct reported allegations.

Personal data and information you provide may also be disclosed to public authorities where required by law.

Unless there is a need to delay notice to ensure the integrity of the investigation and the preservation of relevant information, Magna will notify any person who is the subject of a Hotline report. Your identity will only be disclosed if required by law.

6. International Data Transfers

All these recipients may be located in various countries, including the European Union, the United States, and Canada. In addition, some or all of the information you provide may be stored in Magna's systems in various countries in the course of reviewing and/or investigating your report. As a result, your Personal Data may be transferred to and/or accessible by affiliates within the Magna Group Companies and third parties in countries other than your home country, including countries where the level of data protection may not be as high as within your home country).



In order to adequately protect your Personal Data, Magna has entered into contractual agreements, especially into a data processing agreement for data processing operations which also includes the EU Standard Contractual Clauses, obliging Magna affiliates and external service providers to process your Personal Data in accordance with applicable data protection laws. When using EU Standard Contractual Clauses, we strive to implement additional measures to protect your data. Magna employees having access to your Personal Data have been obliged to maintain data secrecy and confidentiality of your Personal Data. Magna has implemented appropriate technical, organizational, and physical measures to protect your Personal Data, in particular against accidental, unauthorized or unlawful destruction or loss, alteration and disclosure. External service providers may process your Personal Data only as instructed by Magna, have to oblige their personnel authorized to access your Personal Data to maintain data secrecy and confidentiality of your Personal Data, and have been required to implement appropriate technical, organizational, and physical measures to protect your Personal Data which is controlled by Magna regularly (see the NAVEX Global, Inc. Privacy Policy for additional information: <https://www.navexglobal.com/en-us/privacy-statement>).

7. Storage of Personal Data

Any information you submit will be deleted or archived, as applicable, as required by Magna's retention policies and local law. Magna takes appropriate technical, organizational steps to secure the information you provide. Notwithstanding the foregoing, your Personal Data may be stored and used for longer periods (i) as necessary to meet Magna's legal or contractual obligations under applicable law (in this case, Magna may have to store your Personal Data even if you have given consent to the processing and you withdraw your consent later on), or (ii) in case you (subsequently) consent to such longer storage and use.

8. Your Rights

You may at any time, free of charge, review the Personal Data you provided to Magna in connection with your report, and change or remove certain information as provided for in the system for the Hotline.

Insofar as local laws permit, you may at any time, free of charge, request from Magna information about your Personal Data stored and the purposes of its use as well as the correction, deletion of or restriction of processing concerning your Personal Data. With regard to Personal Data provided by you, you may exercise your right to data portability.

As far as you have provided your consent, you may withdraw your consent to the processing of your Personal Data with effect for the future at any time free of charge which enjoins Magna from further processing of your Personal Data. To the extent you request deletion or withdraw consent, Magna will delete your Personal Data and take necessary measures to ensure your Personal Data will not be used for any purpose, except as necessary to meet Magna's legal or contractual obligations under applicable law.

You have the right to file a complaint with the responsible supervising authority.

This Data Privacy Notice is designed to provide a uniform, compliant standard, with the recognition that laws in some jurisdictions may require stricter standards than described in this Data Privacy Notice, in which case your Personal Data will be handled in accordance with any applicable local law.

If you wish to exercise the above rights or have any questions regarding the processing of your Personal Data by Magna for the online reporting system, please contact Magna at the following email address: dataprivacy@magna.com.