

# Subcontractor privacy notice

#### Introduction

We are Yondr, also known as Yondr Group.

This subcontractor privacy notice outlines:

- how we protect your personal data that we collect and process, in accordance with data protection legislation, including the General Data Protection Regulation (GDPR); and;
- What your privacy rights are.

## What personal information do we collect?

We will only collect and process the following information about you in your capacity of employee, director or officer of one of our subcontractors for the purpose of a legal obligation, safeguarding our legitimate business interests and granting you access to Yonder's sites so you can properly perform your work:

- Identification data (e.g. your first name and last name)
- Personal address
- Passport information (e.g. any unique ID number)
- Immigration information (e.g. an A1 form)
- Job title
- Employer name
- Email address
- Emergency contact details
- Language knowledge
- Health-related information
- Information related to training/qualification

We will only keep your information for as long as necessary to complete the purposes mentioned above.



## Why do we use your personal data?

We will process your personal data on the basis of the following grounds:

- To fulfil a contract we have with you or your employer, or take steps to enter into a contract with you or your employer.
- When it's our legal duty (e.g. in relation to supervisory authority investigations or fraud prevention).
- Necessary for our legitimate interests (to avoid litigation following non-compliance which could lead to sanctions being imposed upon us).
- When you consent to it

## How long will we keep your personal data?

We will only keep your information for as long as necessary to complete the purposes mentioned above.

## With whom do we share your personal data?

We may share your personal data with our contractors and service providers who perform certain business-related functions. These companies may include:

- Database service providers, including those providing cloud storage
- Backup and disaster recovery service providers
- Professional service providers (e.g. law and accounting firms)
- Email/mailing service providers
- IT-service providers

We may also need to disclose your personal data to public authorities where required to do so by law in order to, for example, respond to a request from a law enforcement authority, a court or a government agency (including in response to public authorities to meet national security or law enforcement requirements).

To safeguard your personal data, we require third-parties receiving personal data from us to commit to respecting a similar level of the protection of personal data to that under the GDPR in their contracts with us. If we transfer information outside of the European Economic Area (EEA), we will make sure that it is protected in the same way as if it was being used in the EEA. To do this, we will use one or more of these safeguards:

• Only transfer it to a non-EEA country with privacy laws that give the same protection as the EEA, as deemed by the European Commission.



• Ensure that a contract with the recipient is in place that means they must protect it to the same standards as the EEA, such as through certification to the EU-US Privacy Shield or signed EU-approved Standard Contractual Clauses with us.

# Do you want us to share what personal data we have about you, with you?

If you want us to share information that we're obliged to share about you, contact us using one of the methods in the 'How to contact us' section.

#### Is the personal data we have about you incorrect?

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us using one of the methods in the 'How to contact us' section.

If you do, we will take reasonable steps to check its accuracy and correct it.

#### Do you want us to stop using your personal data?

You have the right to object to certain ways that we use your personal data, or to ask us to restrict or stop the processing of, delete, remove, or stop using your personal data if there is no need for us to keep it. These are known as the 'right to restrict', 'right to object' and the 'right to erasure', or the 'right to be forgotten' respectively. In addition, you also have the right to data portability. This means that you can request a copy of your personal data for the purpose of transferring it to another data controller.

In some cases, there will be legitimate, legal, or other official reasons for us to keep your data. But you have the right to contact us using one of the methods in the 'How to contact us' section to request us to stop using your data.

If you exercise one of your data subject rights mentioned above, please note that we will need to verify your identity as to not provide your personal data to the wrong person.

#### Security of your information

To help protect the privacy of data and personally identifiable information you transmit through use of Yondr's website, we maintain physical, technical and administrative safeguards. We update and test our security technology on an on-going basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.



## **Data storage**

Your personal data is stored by Yondr on its servers, and on the servers of the third-party service providers Yondr engages, which are located within the European Union (EU) and in the United Kingdom. Yondr retains data for different durations depending on the purposes for data collection and use.

# How to contact us

If you have any questions, comments, complaints or want more details about how we use your personal data, please let us know. You can contact our Privacy Officer at privacy@yondrgroup.com

We do our best to be transparent, protect your personal data and offer you as much control as we can. If however you deem that we did not act in compliance with applicable privacy and data protection laws, you have the right to lodge a complaint with the Dutch data protection authority (Autoriteit Persoonsgegevens) via their website <u>www.autoriteitpersoonsgegevens.nl</u>

If you are based outside of the Netherlands and in another European country, you can file a complaint with your competent data protection authority. Please consult this <u>link</u> for the contact details of the other European data protection authorities or by using the following QR code:



# Changes to subcontractor privacy notice

We regularly review and, where necessary, update our privacy notice. We reserve our right to amend and update this privacy notice without notice at any time. The most recent version will be available on our website.