



## GLOBAL DATA PRIVACY POLICY

### INTRODUCTION

This Global Data Privacy Policy (“**Policy**”) represents the minimum standards that Modulaire Group and its affiliates (“**Modulaire**”, “**we**”, “**our**”) have set with respect to data privacy, for ensuring that we collect, use, retain and disclose personal data of our employees, workers, customers, suppliers and other third parties in a fair, transparent and secure way. It aligns with (and in some cases exceeds) the main requirements of applicable laws and regulations. The Modulaire Group is made up of different legal entities, details of which can be found in Appendix 1 to this Policy.

This Policy is also aligned with other specific policies of Modulaire relating to the collection and use of personal data implemented by each Modulaire entity to cover the specific personal data processing purposes needed for the day to day activity (e.g. cookies policy, specific local policies such as employees privacy policies, information notices for customers or suppliers etc.) This Policy acknowledges that certain affiliates are located in countries with varying legal and cultural approaches to privacy and data protection and may thus be supplemented by other policies and procedures in certain countries as may be appropriate to comply with applicable laws and meet cultural norms. In the event of a conflict between this Policy and the local applicable privacy policies or supplemental country documents and/or applicable local law as relevant, the local applicable policy or supplemental country documents and local law should prevail.

The scope of this Policy as detailed below is the processing of personal data carried out by Modulaire or on its behalf. The Policy covers all personal data in any form, including but not limited to electronic data, paper documents and disks and all types of processing, whether manual or automated, that is under Modulaire’s possession or control, in all countries where Modulaire operates. This will include information held about Modulaire employees, consultants, clients, consumers, suppliers, business contacts and any third parties etc.

This Policy also applies to any third parties who perform services for or on behalf of Modulaire and who are expected to adopt standards of conduct consistent with the principles of this Policy.

### HOW DO WE ENSURE THE LAWFULNESS, FAIRNESS AND TRANSPARENCY OF OUR PERSONAL DATA PROCESSING?

Personal data is processed on the basis of legal grounds with the informed knowledge of the data subjects.

We will only use personal data:

- if necessary to perform a contract with the data subjects (e.g. our employees, contractors, clients, suppliers etc.);
- if required to comply with a legal obligation;
- where we have a legitimate business need or a legitimate business reason to use personal data as part of our business activities (e.g. when carrying out a processing to

better know our clients) which is not overridden because the processing prejudices the interests or fundamental rights and freedoms of a data subject; or

- where we have the data subject's consent when it is specifically required. For instance where required by law (e.g. consent is generally required - except in certain circumstances - to send marketing information through electronic communication means) or by applicable policy, Modulaire may need to obtain the consent of data subjects in order to collect, use, retain and disclose their personal data. This may also be the case where no other valid grounds described above is applicable and to the extent permitted under applicable law.

We consider that it is important to assess the privacy risks before we collect, use, retain or disclose personal data, such as in a new system or as part of a project.

Modulaire will only process personal data in the way described in its specific privacy notices or privacy policies and in accordance with any consent we have obtained from the data subject and we will provide data subjects with all information required by applicable law including why and how we will use, process, disclose, protect and retain that personal data.

Modulaire will not carry out profiling activities based on automated decision making, unless legally grounded on a requirement of applicable law or the performance of a contract or the data subject's consent and provided that suitable safeguards are implemented to protect the data subjects rights as provided by applicable law.

We use cookie technology on our websites to allow us to evaluate and improve the functionality of our websites. We can also use cookies for advertising or analytics purposes, subject to your consent and depending on your choice by using our cookie control tool, where applicable. For more information about how Modulaire uses cookies, please read our online Cookie Policy at <https://www.modulairegroup.com/cookie-policy>.

We will ensure that data subjects are provided with relevant information, concerning the processing of their personal data. Such information will notably include, the purposes of the personal data processing, the types of personal data collected (if the personal data have not been obtained directly from the data subject), the categories of recipients, the list of rights which may be exercised by the data subjects, the consequences of a failure to reply, the conditions of the transfer of personal data outside EU, if any, and the mechanism used to protect the data in the event of a transfer, etc. This requirement will be satisfied by issuing a privacy notice to data subjects at the point where personal data are originally collected from them. Privacy notices will be written in language which provides data subjects with a clear understanding as to how their personal data will be used and will be concise, transparent, intelligible, easily accessible, and in clear and plain language so that a data subject can understand them easily.

#### **HOW DO WE PROCESS PERSONAL DATA FOR SPECIFIC AND LEGITIMATE PURPOSES AND VERIFY THAT PERSONAL DATA IS MINIMIZED AND ACCURATE?**

Personal data will only be collected and processed for legitimate purposes, complying with the personal data minimisation principle and ensuring the accuracy of the personal data processed. Personal data will be collected only for specified, explicit and legitimate purposes (which could be multiple) and not further processed in a manner that is incompatible with those purposes.

We carefully evaluate and define the purposes of the personal data processing before launching a project (e.g. management of HR data, management of recruitment data, payroll purpose, allocation of IT tools and any other digital solutions or collaborative platforms, IT support management, client relationship management, sales and marketing management, supply

management etc.).

We will ensure that the personal data we collect are relevant, adequate and limited to the purpose of the personal data processing and its eventual use (insights, marketing, promotions, etc.). This means that only necessary and relevant information for the purpose sought can be collected and processed.

When collecting sensitive data or personal data relating to criminal convictions and offences, proportionality is fundamental and more strictly construed. We do not collect sensitive data or personal data relating to criminal convictions and offences, unless required by applicable law or when allowed by applicable law with the data subject's prior express consent.

We will ensure that personal data are maintained in an appropriately accurate and up-to-date form at every step of personal data processing (i.e. collect, transfer, storage and retrieval). All personal data which is found to be inaccurate or out-of-date will be corrected or deleted without delay.

We encourage the data subjects to help us maintaining their personal data up to date by exercising their rights notably of access and rectification (for more information on data subjects rights, see below).

#### **DATA SECURITY MEASURES**

As employees, customers, suppliers, consumers and business partners put their trust in Modulaire when they communicate to us their personal data, Modulaire takes any appropriate measures to ensure the security and confidentiality of the personal data it processes.

We protect any personal data collected, used, retained and disclosed to support our business activities by following the relevant usage, technical and organisational measures and policies, standards and processes.

Industry standard technical and organisational measures are implemented to prevent against accidental or unlawful destruction or loss, alteration, unauthorised or unlawful disclosure or access, or any other unlawful or unauthorised forms of processing.

Where processing is to be carried out on behalf of Modulaire, it will select service providers providing sufficient guarantees (including by implementing technical and organisational measures) to carry out a personal data processing that meets the requirements of applicable data protection laws and ensure the protection of the data subjects' rights. We will only transfer personal data to third party service providers who agree to comply with the required policies and procedures and who have adequate measures in place as requested.

Modulaire endeavours to take reasonable measures based on Privacy by design and Privacy by default as appropriate to implement necessary safeguards when carrying out personal data processing. Modulaire will thus implement technical and organisational measures, at the earliest stages of the design of the processing operations, in such a way that safeguards privacy and data protection principles right from the start (**Privacy by design**). By default, Modulaire should ensure that personal data is processed with privacy protection (for example only the data necessary should be processed, short storage period, limited accessibility) so that by default personal data is not made accessible to an indefinite number of persons (**Privacy by default**).

When a personal data processing is likely to result in a high risk to the rights and freedoms of data subjects, we will carry out a privacy impact assessment prior to its implementation. We will develop, implement and maintain safeguard appropriate to our size and business, our available resources and the amount of personal data we process and identified risks.

Further information on the IT security measures are described in the IT Security General Policy.

### **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

Personal data is kept, as a maximum, for the period necessary for the purpose of the processing in accordance with applicable law and Modulaire's applicable Personal Data Retention Procedure and procedure (more details about the Retention Policy and specific retention periods are available on request using the contact information set out below).

Any person handling personal data for Modulaire will keep it only for as long as it is necessary for the purpose for which it has been collected and processed (and other compatible purposes) which may include:

- to meet or support a business activity;
- to comply with a legal or regulatory requirement and comply with applicable statute of limitation requirements; or
- to defend against legal or contractual actions (in which case, the personal data may be retained until the end of the corresponding statute of limitation or in accordance with any applicable litigation hold policies).

Personal data is retained and destroyed in a manner consistent with applicable law and in accordance with Modulaire's applicable Personal Data Retention Procedure.

### **YOUR LEGAL RIGHTS**

We are receptive to queries or requests made by data subjects in connection with their personal data and where required by law, we provide data subjects with the ability to access, correct, restrict and erase their personal data. We also allow them to oppose the processing of their personal data, and to exercise their right to portability.

**Access right:** we will provide access to all personal data related to a data subject in accordance with applicable law regarding confirmation of and information regarding processing, categories of personal data processed, categories of recipients, data retention term, rights to rectify, delete or restrict the data accessed if applicable, etc.).

**Right to portability:** we may also provide a copy of any personal data that we hold in our records in a format compatible and structured to allow the exercise of right to data portability to the extent it is relevant under applicable law.

**Right to rectification:** data subjects can request that any information which is incomplete, out of date or inaccurate is corrected, amended or erased in accordance with applicable law.

**Right to erasure:** data subjects can request the deletion of their personal data (i) if such personal data is no longer necessary for the purpose of the personal data processing, (ii) the data subject has withdrawn his/her consent on the personal data processing based exclusively on such consent, (iii) the data subject has objected to the personal data processing, (iv) the personal data processing is unlawful, (v) the personal data must be erased to comply with a legal obligation applicable to Modulaire. Modulaire will take reasonable steps to inform the other entities of Modulaire of such erasure.

**Right to restriction:** data subjects can request the restriction of the processing of their personal data (i) if the accuracy of the personal data is contested by a data subject, for such period of time as is necessary for Modulaire to check its accuracy, (ii) if the data subject wishes the personal data to be restricted rather than deleted notwithstanding that the processing is unlawful, (iii) if the data

subject wishes Modulaire to keep the personal data because he/she needs it for his/her defence in the context of legal claims, (iv) if the data subject has objected to the processing but Modulaire conducts verification to check whether it has legitimate grounds for such processing which may override the data subject's own rights.

**Right to withdraw his/her Consent:** when the personal data processing is based on data subject's consent, data subject may withdraw such consent at any moment, without affecting the lawfulness of processing based on consent before its withdrawal.

**Right to object:** data subjects can also indicate their objection to the processing of their personal data at any time (i) when used for marketing purpose or profiling to send targeted advertising, or (ii) to object to the sharing of their personal data with third parties or within the entities of Modulaire, or (iii) when the processing is based on Modulaire's legitimate interest, unless Modulaire demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

To exercise these rights, please use the contact details below.

Data subjects also have the right to **lodge a complaint** with the competent supervisory authority.

#### **DISCLOSURE OF YOUR PERSONAL DATA AND INTERNATIONAL TRANSFERS**

Personal data is only disclosed outside Modulaire where there is an overarching legal justification to do this. Disclosure is made on a strictly limited 'need to know' basis where there is clear justification for transferring personal data - either because the data subject has consented to the transfer or because disclosure is required to perform a contract to which the data subject is a party, or for a legitimate purpose that does not infringe the data subject's fundamental rights, including the right to privacy (e.g. sharing in the context of a merger and acquisition operation etc.).

In each case, the data subject will be aware (for instance, through an information notice) that the disclosure is likely to take place. Assurances will also be sought from recipients of personal data that they will only use the personal data for legitimate / authorised purposes and keep it secure.

If a particular disclosure is required to meet a legal obligation (for example to a government agency or police force / security service) or in connection with legal proceedings, generally the personal data may be provided as long as the disclosure is limited to that which is legally required and, if permitted by law, the data subject has been made aware of the situation (i.e. the data subject was told of the possibility of such an event in an consent or is notified at the time of the request for disclosure).

We do not carry out international transfers of personal data originating from any Modulaire Group entity operating within the EU, from an EU or EEA country, to another non EEA country which does not offer an adequate protection unless specific safeguards are in place. In the event of such transfer of personal data, Modulaire will always ensure that appropriate transfer mechanisms - as required by applicable data protection laws - are in place, to ensure adequate protection of the personal data when transferred (e.g., an adequacy decision from the European Commission or signature of European Commission model clauses alongside appropriate further technical, contractual or organizational measures that are required when assessing the applicable laws of the third party country, as appropriate).

If you require any further information regarding the steps we take when transferring your data then please send a request to [privacyquestions@modulairegroup.com](mailto:privacyquestions@modulairegroup.com).

### **REPORTING A DATA BREACH**

We have put in place procedures to deal with any suspected personal data breach and will notify data subjects or any applicable regulator where we are legally required to do so in accordance with applicable law.

No breach is too small for action. We will examine all claims related to any breach to this Policy or applicable data protection laws, potential or actual, that are brought to our attention or that we become aware of and will take all reasonable measures to limit their impact.

### **COMPLAINTS**

You have the right to make a complaint at any time to the supervisory authority for data protection issues in your own country if you believe that Modulaire has failed to produce a satisfactory response and has not complied with your data protection rights. We would, however, appreciate the chance to deal with your concerns and/or questions before you approach the supervisory authority so please contact us in the first instance at [privacyquestions@modulairegroup.com](mailto:privacyquestions@modulairegroup.com). Where we have a Data Protection Officer (“**DPO**”) appointed in one of our jurisdictions, you can also contact them. Details of any DPOs can be found in Appendix 2.

Modulaire is committed to resolving the legitimate privacy issues of its staff, clients and other contacts. If a member of staff feels that he/she has done something in breach of this Policy, they must contact by email the relevant data privacy contact in the country where she/he is located and report the matter.

Data subjects are informed that they can complain about privacy issues by writing an email to the relevant data privacy contact in the country where she/he is located and that they may file a complaint with a supervisory authority. In particular, this will be expressly specified in the privacy notices communicated to and/or accessible by data subjects.

If an individual covered by this Policy files a complaint about the processing of his/her or someone else’s personal data, and the complaint is not satisfactorily resolved through this internal procedure, Modulaire will co-operate with the appropriate data protection authorities and comply with the advice of such authorities to resolve any outstanding complaints. In the event that the data protection authorities determine that Modulaire or one or more of its staff failed to comply with this Policy or the data protection laws, upon recommendation of the authorities, Modulaire will take appropriate steps to address any adverse effects and to promote future compliance.

### **UPDATES TO THIS POLICY**

As our business and the regulatory environment change regularly, this Policy may also be reviewed and updated from time to time. Modulaire invites you to read this Policy on a regular basis and each time you are notified of changes, to check the updates as posted on Modulaire’s website <https://www.modulairegroup.com/>.

### **GLOSSARY**

**Modulaire**

Modulaire Holding S.à r.l. and/or each or all the various Modulaire affiliates which are part of Modulaire including those in Appendix 1.

<b>Third Party</b>	a third party or business Partner who receives from Modulaire or who is otherwise entrusted with personal data on behalf of Modulaire, such as suppliers, contractors, sub-contractors and other service providers.
<b>Data subject</b>	a living, identified or identifiable person whose personal data is being processed by Modulaire.
<b>Consent</b>	any freely given, unambiguous, specific and informed indication by a statement or by a clear positive action, of the data subject's agreement to the processing of his/her personal data
<b>Personal Data</b>	any information capable of identifying a natural person, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity either alone or in combination with other data. Data is considered personal when it enables anyone to link information to a specific person, even if the person or entity holding that data cannot make that link. personal data includes sensitive data and pseudonymisation personal data but excludes anonymous data or data that has had the identity of the individual permanently removed.
<b>Sensitive Data (or Special Category of Data)</b>	data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning physical and mental health or data concerning a natural person's sex life or sexual orientation, and <b>personal data relating to criminal convictions and offences</b> are a subset of personal data , which due to their nature have been classified by law or by an applicable policy as deserving additional privacy and security protections.
<b>Process(ed) / Processing</b>	any operation or set of operations that is performed upon personal data , whether or not by automatic means, including, but not limited to collection, recording, organisation, storage, access, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, making available, alignment, combination, blocking, deleting, erasure, or destruction (and process will be interpreted accordingly).

**APPENDIX 1 – APPLICABLE MODULAIRE GROUP ENTITIES**

<b>Entity</b>	<b>Country</b>
<b>APAC</b>	
Algeco Technology (Shenzhen) Co. Ltd.	China
Algeco Chengdong International Modular Housing Co., Ltd.	China
Ausco Holdings Pty Limited	Australia
Ausco Acquisitions Pty Limited	Australia
Ausco Asia Pty Limited	Australia
Ausco Modular Pty Limited	Australia
Ausco Modular Construction Pty Ltd	Australia
Ausco Finance Limited	Australia
New England Trading Pty Ltd	Australia
Portacom New Zealand Limited	New Zealand
Uniteam Mobile Shelter System Co., Ltd	China
Uniteam China Ltd	Hong Kong
<b>EUROPE</b>	
Algeco Holdings B.V.	Netherlands
Algeco UK Holdings Limited	UK
Elliott Group Limited	UK
Advanté Limited	UK
Carter Accommodation Group Limited	UK
Carter Accommodation Holdings Limited	UK
Carter Accommodation Limited	UK
Carter Cabin Hire Limited	UK
MBM Mietsystem für Bau und Industrie GmbH	Germany
Algeco GmbH	Germany
Algeco s.r.o.	Czech Rep.
Algeco S.R.L.	Romania
Algeco Polska Sp. Zo.o.	Poland
Algeco Schweiz AG	Switzerland
Ristretto Investissements SAS	France
Algeco SAS	France
Altempo SAS	France
Algeco Belgium NV	Belgium
Algeco S.p.A.	Italy
Algeco Construcciones Modulares, S.L.	Spain
Algeco - Construções Pré-Fabricadas, S.A.	Portugal
Algeco LLC	Russia
Algeco B.V.	Netherlands
Algeco Holdings (Austria) GmbH	Austria
Algeco Austria GmbH	Austria
Algeco d.o.o.	Slovenia
Algeco Kft.	Hungary
Buko Bouwsystemen Vuren B.V.	Netherlands
Buko Bouw & Winkels B.V.	Netherlands
Algeco Nordics AS	Norway
Algeco Oy	Finland
Malthus Uniteam Holding AS	Norway
Malthus Uniteam AS	Norway
Uniteam Poland Spółka Z.O.O	Poland



Malthus Uniteam (UK) Ltd	UK
Uniteam Aktiebolig	Sweden
Wexus Group AS	Norway
Wexus Gruppen AS	Norway
Module Tech Oü	Estonia
Wexus AB	Sweden
Algeco AB	Sweden
TS Nordics Holding AB	Sweden
TS Nordics Group AB	Sweden
Temporary Space Nordics AB	Sweden
Temporary Space Nordics Pavilions A/S	Denmark
Temporary Space Nordics ApS	Denmark
Temporary Space Nordics AS	Norway
Temporary Space Nordics Oy	Finland
Modulaire Holding S.à r.l.	Luxembourg
Algeco GP S.à r.l.	Luxembourg
Algeco Jersey Manco Limited	Jersey
Modulaire Limited Partnership SLP	Luxembourg
Algeco S.à r.l.	Luxembourg
Modulaire Management Nominee Limited	UK
Algeco Management S.C.A.	Luxembourg
Algeco Group S.à r.l.	Luxembourg
Modulaire Global S.à r.l.	Luxembourg
Modulaire Investments 1 S.à r.l.	Luxembourg
Modulaire Investments 2 S.à r.l.	Luxembourg
Modulaire Investments 3 S.à r.l.	Luxembourg
Modulaire Investments B.V.	Netherlands
Modulaire Global Finance Plc	UK
Modulaire Global Finance 2 Plc	UK
Algeco Finance NV	Belgium
<b>CANADA</b>	
Malthus Uniteam Canada Limited	Canada

**APPENDIX 2 – DATA PROTECTION OFFICERS**

<b>Jurisdiction</b>	<b>Name</b>	<b>Contact Details</b>
Italy	Rocco Chiruzzi	<a href="mailto:Rocco.chiruzzi@algeco.com">Rocco.chiruzzi@algeco.com</a> M: +39 331 63 28 204 T: +39(0)80 53 11 138
Germany	YourIT	<a href="mailto:Thomas.stroebele@yourIT.de">Thomas.stroebele@yourIT.de</a> T: +49 747 193 0100 M: +49 170 968 7481
Portugal	Luis Jesus	<a href="mailto:Luis.jusus@algeco.com">Luis.jusus@algeco.com</a> +351 263 006 368 +351 932 636 267
Belgium	Nancy VandeReyd	<a href="mailto:Nancy.vandereyd@algeco.com">Nancy.vandereyd@algeco.com</a> M: +32 11 45 72 62

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