

GLOBAL DATA PROTECTION POLICY

1. INTRODUCTION

- 1.1 This Global Data Protection Policy ("**Policy**") represents the minimum standards that Modulaire Group and its affiliates ("**Modulaire**", "**we**", "**our**") have set with respect to data privacy, and the collection, use, retention and disclosure of personal data in a fair, transparent and secure way. The Modulaire Group is made up of different legal entities, details of which can be found in Annex 1 to this Policy.
- 1.2 You must read and comply with this Policy. It applies to all employees and other persons working for us or on our behalf, including, for example, workers, contractors, consultants, volunteers, and interns ("**you**", "**your**"). 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.
- 1.3 This Policy sets out our commitment to data protection and what we expect from you in order for us to comply with applicable data protection laws. Data protection is the shared task of all members of staff and business functions and all staff members. You are expected to be familiar with and adhere to the principles and requirements set forth in this Policy.
- 1.4 This Policy should be read together with other specific policies of Modulaire relating to the collection and use of personal data implemented by Modulaire to cover the specific personal data processing purposes needed for the day-to-day activity (e.g. privacy notices, global privacy policy, supplier privacy policy, customer privacy policy, and various GDPR policies.)
- 1.5 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.
- 1.6 The scope of this Policy as detailed below is the protection of personal data processed by Modulaire, or on its behalf. This Policy sets out principles that we expect you to adhere to and steps that we expect you to take in connection with personal data you come across 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.
- 1.7 This Policy is non-contractual which means that it does not give any legal rights to individuals. We may change all or any part of it in any way at any time. Any changes to it will be communicated to you in accordance with our usual communication practices.

- 1.8 If you have any questions or concerns about this Policy, you should contact dataprivacy@modulairegroup.com or any of the individuals whose contact details are set out in Annex 2 of this Policy.

2. YOUR RESPONSIBILITIES

- 2.1 You may have access to the personal data of other members of staff, suppliers and clients of Modulaire in the course of your employment or engagement. You are responsible for implementing this policy and helping Modulaire comply with the data protection principles outlined in section 3 of this Policy.

You must comply with this Policy when handling Modulaire personal data.

In particular, you must:

- maintain the confidentiality of personal data;
- only access personal data that you have authority to access and only for authorised purposes;
- only allow other members of staff to have access to personal data if they have appropriate authorisation;
- not disclose any personal data except to individuals (whether internally or externally) who have appropriate authorisation;
- keep personal data secure;
- not remove personal data, or devices containing (or that can be used to access) it, from the Modulaire premises without adopting appropriate security measures;
- not store personal data on local drives or on personal devices that are not authorised for work use;
- report any actual or suspected data breaches of which you become aware to dataprivacy@modulairegroup.com and your line manager immediately as set out in the Personal Data Security Breach Management Procedure (*which can be found on: [Ethics and Compliance Policy Information](#)*).

- 2.2 It is important that the personal data we hold is accurate and up to date. If your personal data changes it is important for the protection of your own interests that you let us know promptly by contacting the HR Department.

3. DATA PROTECTION PRINCIPLES

Modulaire is committed to complying with the following data protection principles:

3.1 Lawfulness, fairness and transparency

- (a) Under this principle, personal data must be processed lawfully, fairly and in a transparent manner. Modulaire takes the obligation to process personal data, including special categories of personal data, where the processing can be legally justified. Modulaire aims to rely on appropriate lawful bases and/or, where required, additional bases under applicable local laws.
- (b) Lawfulness: Personal data must only be processed when Modulaire can rely on specific legal grounds and with the knowledge of the data subjects.
- (c) Under EU and UK law, when an activity involves the use of 'simple' personal data i.e. data which is not special category or criminal offence data, we are required to have a lawful basis under Article 6 of the GDPR. Under Article 6 of the GDPR, the processing must be:
 - (i) necessary to perform a contract with the data subjects (e.g. our employees, contractors, clients, suppliers etc.);
 - (ii) required to comply with a legal obligation Modulaire is subject to;
 - (iii) necessary for Modulaire's or a third party's legitimate interests, for example, it is necessary to use personal data for 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;
 - (iv) carried out 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; or
 - (v) necessary in order to protect the vital interest of the data subject or another natural person.
- (d) Under EU and UK law, when any activity involves the use of special category data, we are required to have a lawful basis both under Article 6 and Article 9 of the GDPR.
- (e) We may process special category data under an Article 6 lawful basis and the following Article 9 lawful bases:

- (i) the individual has given explicit consent to the processing of their personal data for one or more specified purposes;
 - (ii) the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of Modulaire or of the individual in the field of employment and social security and social protection law in so far as it is authorised by applicable law;
 - (iii) the processing is necessary to protect the vital interests of the individual or of another natural person when the individual is physically or legally incapable of giving consent;
 - (iv) the processing relates to personal data which are manifestly made public by the individual;
 - (v) the processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity; or
 - (vi) the processing is necessary for reasons of substantial public interest with a basis in applicable law.
- (f) Under EU and UK law, when any activity involves the use of criminal offence data Modulaire is required to have a lawful basis under Article 6 of the GDPR and a basis under applicable local law. It is important that you assess the privacy risks before you collect, use, retain or disclose personal data, such as in a new system or as part of a project. Please reach out to dataprivacy@modulairegroup.com before collecting data or using data on Modulaire systems for any new purposes.
- (g) Personal data should only be processed in the way described in the specific privacy notices or privacy policies and in accordance with any consent we have obtained from the data subject and that data subjects are provided with all of the information required by applicable law including why and how we will use, process, disclose, protect and retain that personal data.
- (h) Transparency: Modulaire is under an obligation to 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 and UK, if any, and the mechanism used to protect the data in the event of a transfer, etc. This requirement may be satisfied by issuing a privacy notice to data subjects. Modulaire places significant importance in ensuring that privacy notices are 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. When Modulaire

issues privacy notices you may be required to provide information to be included in the notices. Modulaire expects your support with ensuring that such privacy notices comply with applicable regulatory requirements.

- (i) We use cookie technology on our websites to allow us to evaluate and improve the functionality of our websites. Cookies may also be used for advertising or analytics purposes. For more information about how Modulaire uses cookies, please read our online Cookie Policy at <https://www.modulairegroup.com/cookie-policy>.

3.2 Purpose limitation

- (a) Under this principle, personal data must 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.
- (b) We aim to 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.).
- (c) We will aim to 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 you should make sure that only information which is necessary and relevant information to the purported use is collected and processed.
- (d) When collecting sensitive data or personal data relating to criminal convictions and offences, proportionality is fundamental and more strictly construed. You must only collect special category data or personal data relating to criminal convictions and offences, if this is envisaged in the respective privacy notices and, if so, this information should only be used for the purposes set out in those privacy notices.

3.3 Accuracy

Under this principle, personal data must be maintained in an appropriately accurate and up-to-date form at every step of personal data processing (i.e. collect, transfer, storage and retrieval). We will take all reasonable steps so that personal data which is found to be inaccurate or out-of-date is corrected or deleted without delay.

3.4 Data minimisation

Under this principle, personal data must be adequate, relevant and limited to what is necessary for the purposes of processing.

3.5 Storage limitation

Under this principle, personal data must not be kept in a form which allows the identification of data subject for longer than is necessary for the purposes for which the personal data is processed.

3.6 Integrity and confidentiality - data security measures

- (a) Under this principle, personal data must be kept secure through the use of appropriate technical and organisational measures. As employees, customers, suppliers, consumers and business partners put their trust in Modulaire when they communicate to us their personal data, Modulaire takes various measures to protect the security and confidentiality of the personal data it processes.
- (b) To protect the personal data collected, used, retained and disclosed to support our business activities we expect that you will follow the relevant usage, technical and organisational measures and policies, standards and processes.
- (c) To fulfil our commitment to protect the personal data we process, we have implemented various measures to protect against accidental or unlawful destruction or loss, alteration, unauthorised or unlawful disclosure or access, or any other unlawful or unauthorised forms of processing. Further information on the IT security measures is provided in the IT Security General Policy (*which can be found on [Ethics and Compliance Policy Information](#)*).

4. **PRIVACY BY DESIGN AND DEFAULT AND AUTOMATED DECISION-MAKING**

- 4.1 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 aim to implement technical and organisational measures, at the earliest stages of the design of the processing operations, to safeguard privacy and data protection principles right from the start ("**Privacy by design**"). Modulaire should aim to 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**").
- 4.2 You are expected to support Modulaire's efforts so that no automated decision making is carried out unless authorised under applicable law or required for the performance of a contract or based on the data subject's consent and provided that suitable safeguards are implemented to protect the data subjects' rights as provided by applicable law. Please discuss any new projects or activities that you think might involve automated decision making with Modulaire before these have begun.

5. HIGH RISK DATA PROCESSING

- 5.1 When personal data processing is likely to result in a high risk to the rights and freedoms of data subjects, Modulaire will be legally required to carry out a data protection impact assessment ("**DPIA**") prior to its implementation. A DPIA is a type of risk assessment exercise which aims to assess the level of data protection risk that might be created by a data processing activity and help companies mitigate the identified data protection risk. Examples of activities for which a DPIA will be required include large scale use of special category or criminal offence data and extensive profiling of individuals.
- 5.2 You may be asked to assist with the creation or maintenance of DPIAs. When your assistance is required, you must support the business promptly and ensure that the information provided is accurate.

6. HOW LONG DO WE KEEP PERSONAL DATA?

- 6.1 Modulaire is committed to retaining personal data, for no longer than necessary for the purpose of the processing 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 in Annex 2 of this Policy).
- 6.2 You must ensure you support the business when handling personal data for Modulaire including in its efforts to keep personal data 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:
- (a) to meet or support a business activity;
 - (b) to comply with a legal or regulatory requirement and comply with applicable statute of limitation requirements; or
 - (c) 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).
- 6.3 You must follow any data retention guidelines Modulaire makes available from time to time. Please review Modulaire's applicable Personal Data Retention Procedure for further information.

7. DATA SUBJECT REQUESTS

Individuals have the rights set out below in relation to their personal data:

- 7.1 **Right to access:** data subjects have the right to receive a copy of their personal data and some supplementary 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.).

- 7.2 **Right to portability:** data subjects have the right to request the transfer of personal data that we hold in our records to a third party in a format compatible and structured.
- 7.3 **Right to rectification:** data subjects have the right to request that information which is incomplete, out of date or inaccurate is corrected, supplemented or amended.
- 7.4 **Right to erasure:** data subjects have the right to 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.
- 7.5 **Right to restriction:** individuals have the right to request the restriction or suppression 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.
- 7.6 **Right to withdraw consent:** when the personal data processing is carried out based on the individual's consent, the individual may withdraw their consent at any moment, without affecting the lawfulness of processing based on consent before its withdrawal.
- 7.7 **Right to object:** data subjects have the right to object to the processing of their personal data at any time (i) when used for marketing purposes or profiling to send targeted advertising, or (ii) 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 the processing is required for the establishment, exercise or defence of legal claims.
- 7.8 **Right to complain:** Data subjects also have the right to lodge a complaint with the supervisory authority in the country in which they reside.
- 7.9 In many instances, the rights above are not absolute many are subject to exemptions or only applicable in certain circumstances.

- 7.10 When an individual seeks to exercise these rights, these are known as "data subject requests". If you receive such a request, you should refer it immediately to dataprivacy@modulairegroup.com, the HR Department and your locally appointed Data Protection Officer. You may be required to help formulate the response(s) to any such requests received.

Modulaire must respond to data subject requests **within one month of receipt of the request**.

It is therefore important that you share any request/communication you think might be a data subject request with dataprivacy@modulairegroup.com, the HR Department and your locally appointed Data Protection Officer **immediately**.

- 7.11 The timescale starts as soon as Modulaire receives a data subject request. If the request is large or unclear, the requester should be contacted as soon as possible to clarify the scope of the request and what personal data are being sought.
- 7.12 Given the considerable amount of work involved in responding to data subject requests and the short timeframe involved, it is important that employees pass any requests on immediately to dataprivacy@modulairegroup.com, the HR Department and their locally appointed Data Protection Officer.

8. DISCLOSURE OF PERSONAL DATA

- 8.1 All records containing personal data are the property of Modulaire and all members of staff are expected to hold all business records in confidence and to treat them as Modulaire assets. Personal data must be safeguarded and may only be disclosed to parties outside of Modulaire with proper authorisation.
- 8.2 Even when Modulaire has provided such authorisation, data protection legislation requires that a lawful basis must be identified before it can be shared.
- 8.3 Personal data must 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 – for example, the data subject has consented to the transfer or the 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.). For more information on lawful bases, see the 'Data Protection Principles (Lawfulness, fairness and transparency)' section above.
- 8.4 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).

8.5 Where processing is to be carried out on behalf of Modulaire, Modulaire is required to select service providers providing sufficient guarantees (including by implementing technical and organisational measures) to carry out personal data processing that meets the requirements of applicable data protection laws and ensure the protection of the data subjects' rights.

8.6 Please send a request to dataprivacy@modulairegroup.com before engaging any third party supplier or sharing any Modulaire data with a third party. You should 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.

9. INTERNATIONAL DATA TRANSFERS

9.1 Transfers of personal data originating from any Modulaire Group entity operating within the EU or the UK to another country outside the EU or UK must not be made unless specific safeguards are in place. Transfers of personal data includes remote access to personal data or access to cloud servers based in the EU and the UK.

9.2 In the event of such transfer of personal data, you are required to 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 UK government, execution of European Commission model clauses or the UK addendum to the model clause alongside appropriate further technical, contractual or organizational measures that are required when assessing the applicable laws of the third party country, as appropriate).

9.3 If you require any further information regarding the steps we take when transferring your data then please send a request to dataprivacy@modulairegroup.com.

10. REPORTING A DATA BREACH

10.1 Generally speaking, a personal data breach is any incident which leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed by our systems.

10.2 If you become aware of an incident that may involve a personal data breach you should immediately inform Modulaire at dataprivacy@modulairegroup.com and your line manager with sufficient information about the breach for an assessment of its seriousness. If you are a line manager, please see the Personal Data Security Breach Management Procedure for information on the steps you should take after receiving a notification about an actual or suspected personal data breach.

Modulaire is legally required to report certain data breaches to the data protection regulator without delay and, in any event, **within 72 hours of becoming aware of them.**

It is therefore important that you notify dataprivacy@modulairegroup.com and your line manager as set out in the Personal Data Security Breach Management Procedure **immediately** if you believe you have come across a data breach.

10.3 In the event that Modulaire suffers a personal data breach, Modulaire is required to report the personal data breach to a supervisory authority without undue delay and in any event within 72 hours after having become aware of it, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Modulaire may also be required to notify any affected individuals. No breach is too small for action. We must examine all claims related to any breach to this Policy or applicable data protection laws, potential or actual, as part of our efforts to limit their impact. Please report any incident which you suspect could be a data breach to dataprivacy@modulairegroup.com and your line manager immediately.

10.4 Please refer to the Personal Data Security Breach Management Procedure (*which can be found on: [Ethics and Compliance Policy Information](#)*) for further information.

11. 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/>.

12. GLOSSARY

Modulaire	BCP V Modular Services Holdings Limited and/or each or all the various Modulaire affiliates which are part of Modulaire including those in Annex 1.
data subject	a living, identified or identifiable person whose personal data is being processed by Modulaire.
consent	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.
personal data	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,

	<p>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 pseudonymised personal data but excludes anonymous data or data that has had the identity of the individual permanently removed.</p>
sensitive data (or special category of data)	<p>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 personal data relating to criminal convictions and offences 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.</p>
Process(ed) / Processing	<p>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).</p>

ANNEX 1

APPLICABLE MODULAIRE GROUP ENTITIES

Entities List

Company Name	Jurisdiction
ADVANTÉ LIMITED	England and Wales
ALGECO - CONSTRUÇÕES PRÉ-FABRICADAS, S.A.	Portugal
ALGECO AUSTRIA GMBH	Austria
ALGECO B.V.	Netherlands
ALGECO BELGIUM NV	Belgium
ALGECO BOUW & WINKELS B.V.	Netherlands
ALGECO CONSTRUCCIONES MODULARES, S.L.U	Spain
ALGECO D.O.O.	Slovenia
ALGECO DENMARK A/S	Denmark
ALGECO FINANCE NV	Belgium
ALGECO FINLAND OY	Finland
ALGECO GMBH	Germany
ALGECO HOLDINGS (AUSTRIA) GMBH	Austria
ALGECO HOLDINGS B.V.	Netherlands
ALGECO KFT.	Hungary
ALGECO NORDICS AS	Norway
ALGECO NORWAY AS	Norway
ALGECO NORWAY HOLDING AS	Norway
ALGECO POLSKA SP. ZO.O.	Poland

Company Name	Jurisdiction
ALGECO S.P.A.	Italy
ALGECO S.R.L.	Romania
ALGECO S.R.O.	Czech Republic
ALGECO SAS	France
ALGECO SCHWEIZ AG	Switzerland
ALGECO STORAGE HOLDINGS LIMITED	England and Wales
ALGECO STORAGE LIMITED	England and Wales
ALGECO SWEDEN AB	Sweden
ALGECO SWEDEN HOLDING AB	Sweden
ALGECO TECHNOLOGY (SHENZHEN) CO. LTD.	China
ALGECO UK HOLDINGS LIMITED	England and Wales
ALGECO UK LIMITED	England and Wales
ALTEMPO SAS	France
AUSCO ACQUISITIONS PTY LIMITED	Australia
AUSCO ASIA PTY LTD	Australia
AUSCO FINANCE LIMITED	Australia
AUSCO HOLDINGS PTY LIMITED	Australia
AUSCO MODULAR CONSTRUCTION PTY LTD	Australia
AUSCO MODULAR PTY LTD	Australia
BCP V MODULAR SERVICES FINANCE II PLC	England
BCP V MODULAR SERVICES FINANCE PLC	England
BCP V MODULAR SERVICES HOLDINGS II LIMITED	England

Company Name	Jurisdiction
BCP V MODULAR SERVICES HOLDINGS III LIMITED	England
BCP V MODULAR SERVICES HOLDINGS LIMITED	Jersey
CARTER ACCOMMODATION GROUP LIMITED	England and Wales
CARTER ACCOMMODATION HOLDINGS LIMITED	England and Wales
CARTER ACCOMMODATION LIMITED	England and Wales
FAE COSTRUZIONI MODULARI S.R.L	Italy
MALTHUS UNITEAM (UK) LTD	Scotland
MBM MIETSYSTEM FÜR BAU UND INDUSTRIE GMBH	Germany
MODULAIRE GLOBAL FINANCE 2 PLC	England
MODULAIRE GLOBAL FINANCE PLC	England
MODULAIRE GROUP HOLDINGS LIMITED	England
MODULAIRE INVESTMENTS 2 S.À R.L.	Luxembourg
MODULAIRE INVESTMENTS 3 S.À R.L.	Luxembourg
MODULAIRE INVESTMENTS B.V.	Netherlands
MODULE TECH OÜ	Estonia
NEW ENGLAND TRADING PTY LTD	Australia
PORTACOM NEW ZEALAND LIMITED	New Zealand
PROCOMM SITE SERVICES (HOLDINGS) LIMITED	England and Wales
PROCOMM SITE SERVICES LIMITED	England and Wales
RISTRETTO INVESTISSEMENTS SAS	France
UNITEAM CHINA LTD	Hong Kong
UNITEAM POLAND SPÓŁKA Z.O.O	Poland

Company Name	Jurisdiction
UNITEAM PROJECT AS	Norway
ZHANGJIAGANG UNITEAM MOBILE SHELTER SYSTEM CO., LTD	China

ANNEX 2

CONTACT US

Jurisdiction	Name	Contact Details
UK	Data Privacy Inbox	dataprivacy@modulairegroup.com
Data Protection Officers		
Italy	Simona Ruggeri	Simona.Ruggeri@algeco.com M: +39 333 62 74 564
Germany	YourIT	Thomas.stroebele@yourIT.de T: +49 747 193 0100 M: +49 170 968 7481
Portugal	Luis Jesus	Luis.jesus@algeco.com +351 263 006 368 +351 932 636 267
Belgium	Nancy Vande Reyd	Nancy.vandereyd@algeco.com M: +32 11 45 72 62