
DATA PROTECTION NOTICE FROM THE DENYS GROUP

1. INTRODUCTION

This Data Protection Notice applies to all companies cited below, which are part of the Denys group:

- NV Denys Global with registered offices at Van Orleystraat 15, 1000 Brussels and enterprise number 0416.598.964;
- NV Denys with registered offices at Industrieweg 124, 9032 Wondelgem and enterprise number 0416.585.801;
- NV Denys Support with registered offices at Industrieweg 124, 9032 Wondelgem and enterprise number 0508.751.736;
- SAS Denys France with registered offices at 21, Boulevard Haussman 75009 Paris and enterprise number 503 648 180 R.C.S. Paris
- Denys Ltd with registered offices at 8, Northumberland Avenue, WC2N 5BY London and enterprise number 5813452;
- Denys Engineers & Contractors BV with registered offices at Darwinstraat 5, 2722 PX Zoetermeer and Chamber of Commerce no. 27142635;
- SA Conduites et Entreprises with registered offices at Avenue Jean Mermoz 22, 6041 Gosselies and enterprise number 0418.544.409;
- NV Building with registered offices at Vaartstraat 174, 2520 Oelegem and enterprise number 0404.626.788;
- NV Socea with registered offices at Vaartstraat 174, 2520 Oelegem and enterprise number 0889.622.355;
- NV Foremost Immo with registered offices at Van Orleystraat 15, 1000 Brussel and enterprise number 0866.848.319;
- NV Future Foundations with registered offices at Industrieweg 124, 9032 Wondelgem and enterprise number 0644.842.934;
- NV Arcaterra with registered offices Industrieweg 124, 9032 Wondelgem and enterprise number 0883.551.026;

- NV Artenys with registered offices at Kleinveeshuissteeg 2 bus A, 9000 Gent and enterprise number 0556.696.658;

The Denys group attaches considerable importance to your personal data being collected and processed in a secure, transparent and confidential manner. In particular, we aim to protect data concerning our clients, subcontractors and suppliers, etc. against loss, breaches, errors, unauthorised access and improper processing, among other things.

By means of this Data Protection Notice, we wish to inform you about the collection and processing of your personal data.

We ask you to read this Data Protection Notice carefully, since this contains essential information on how your personal data is processed and for what purpose.

By providing your personal data, you explicitly declare to have read this Data Protection Notice, and also explicitly agree with it, as well as with the processing itself.

2. APPLICABILITY

This Data Protection Notice relates to all services we provide, and in general to all activities we perform.

3. CONTROLLER AND ITS COMMITMENTS

The companies stated in the introduction are controllers of your personal data.

When collecting and processing your personal data, we respect Belgian regulations concerning protecting personal data, as well as the General Data Protection Regulation (GDPR) as of its entry into force on 25 May 2018.

4. PERSONAL DATA

According to your activities and your relationship with our company, you provide us with the following personal data: your identity and contact details (name, title, address, email address, telephone and mobile number). For specific legal obligations (electronic attendance registration, art. 30Bis declaration of works), it may be that you provide us with additional data so as to record your attendance (such as E-ID details, Limosa number).

We would like to refer to your bearing responsibility for all data you provide us, and that we rely on its accuracy. Should your data no longer be up to date, please inform us immediately.

Although you are not obliged to communicate your personal data, you understand that providing certain services or collaboration becomes impossible if you do not agree with it being collected and processed.

5. PURPOSES FOR PROCESSING AND LAWFUL BASIS

5.1 Client data

Within the scope of our services and our activities, we collect and process the identity and contact details of our customers and clients, their staff, employees, appointees and other useful contacts. The purposes for this

processing is to implement agreements with our clients, client management, accounting and direct marketing activities such as sending out promotional and commercial information. The lawful bases are implementing the agreement, fulfilling legal and regulatory obligations (such as the art. 30Bis declaration of works) and/or our legitimate interest.

5.2 Data concerning suppliers, subcontractors and service providers

We collect and process the identity and contact details of our suppliers, subcontractors and service providers, as well as their potential (sub)contractor(s), their staff, employees, appointees and other useful contacts. The purposes of this processing are implementing this agreement, managing the suppliers/subcontractors/service providers, accounting and direct marketing activities such as sending out promotional or commercial information. The lawful bases are implementing the agreement, fulfilling legal and regulatory obligations (such as, for example, compulsory electronic attendance registration, the art. 30Bis declaration of works, the attendance list or other obligations in the case of public procurement contracts) and/or our legitimate interest (such as for direct marketing). If necessary, E-ID data or the Limosa number are also processed for electronic attendance registration. Permission will always be requested for direct marketing activities by email (such as a newsletter or invitation to events), which can be withdrawn at any time.

5.3 Staff data

We process our employees' personal data within the scope of our staff management and payroll administration. Given its specific nature, this processing is regulated more extensively in a Data Protection Policy for employees.

5.4 Other data

Besides data concerning clients, suppliers/subcontractors and staff, we also process personal data concerning others, such as possible new clients/prospects, useful contacts within our sector, network contacts and expert contacts. The purposes of this processing are in the interests of our activities, direct marketing and public relations. The lawful basis is our legitimate interest or, in certain cases, the implementation of an agreement.

6. DURATION OF THE PROCESSING

We store and process personal data for a period necessary depending on the purposes of the processing and the role of the relationship (contractual or otherwise) we have with you.

Client data and data concerning suppliers or subcontractors will in any event be deleted from our systems following a 10-year period after the agreement or the project has ended, except concerning personal data we are obliged to store for longer based on specific legislation, or in the event of an ongoing dispute for which the personal data is still required.

7. RIGHTS

In accordance with and under the conditions of Belgian privacy legislation and the provisions of the General Data Protection Regulation, we inform you that you have the following rights:

- Right of access: you are entitled, free of charge, to access the data we have concerning you and to

verify the purpose for which this is used.

- Right to rectification: you are entitled to have your incorrect personal data rectified (correction), as well as to have incomplete personal data completed.
- Right to erasure or restriction: you are entitled to request us to erase your personal data or to restrict its processing in the circumstances and under the conditions as stipulated in the General Data Protection Regulation. We may refuse to erase or restrict any personal data essential to us for performing a legal obligation, implementing the agreement or our legitimate interest, provided this data is necessary for the purposes for which it was collected.
- Right to data portability: you are entitled to obtain the personal data you have provided us in a structured, commonly used and machine-readable form. You are entitled to transfer this data to another controller for processing.
- Right to object: you are entitled to object to your personal data being processed due to serious and legitimate reasons. Please also take into account that you are unable to object to processing personal data that is essential to us for performing a legal obligation, implementing the agreement or our legitimate interest, provided this data is necessary for the purposes for which it was collected.
- Right to withdraw permission: If the processing of personal data is based on prior permission, you have the right to withdraw this permission. This personal data will then only be processed if we have another lawful basis to do so.
- Automatic decision-making and profiling: we confirm that processing personal data does not entail profiling, and that you are not subject to fully automated decisions.

You may exercise the above rights by sending an email to the Denys group: dataprotection@denys.com.

We do our utmost to handle your personal data in a careful and legitimate manner, in accordance with applicable regulations. If you nevertheless believe your rights have been violated and your concerns are not addressed within our company, you are free to lodge a complaint with:

Belgium:

Gegevensbeschermingsautoriteit/ Data Protection Authority

Rue de la Presse/Drukpersstraat 35, 1000 Brussels

Tel. 02 274 48 00

Fax: 02 274 48 35

<http://www.dataprotectionauthority.be>

The Netherlands

Autoriteit Persoonsgegevens (Dutch Data Protection Authority)

Postbus 93374

2509 AJ The Hague (Den Haag)

Tel. 088 1805 250

www.autoriteitpersoonsgegevens.nl/en

France

Commission Nationale de l'Informatique des Libertés
3 Place de Fontenoy
TSA 80715
75334 Paris Cedex 07
Tel. 01 53 73 22 22
www.cnil.fr/en

UK:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow
Cheshire
SK9 5AF
Tel. 0303 123 1113
www.ico.org.uk

You can in addition appeal to a court when you believe you have suffered damage resulting from your personal data being processed.

8. TRANSFER TO THIRD PARTIES

Certain personal data we collect will be transferred to and possibly processed by third-party service providers, such as our IT supplier, accountant, auditor, as well as the government (e.g. in the case of the 30bis declaration of works, electronic attendance registration or with public procurement contracts).

It is possible that one or more of the abovementioned third parties are located outside the European Economic Area ("EEA"). Personal data will nevertheless only be forwarded to third countries with a suitable level of protection.

The employees, managers and/or representatives of the abovementioned service providers or institutions and the specialised service providers they engage must respect the confidential nature of your personal data, and this data must only be used for the purposes for which they were provided.

If necessary, your personal data may be forwarded to other third parties. This might be the case, for instance, if we are wholly or partially reorganised, our activities are transferred, or if we are declared bankrupt. It is also possible that personal data is forwarded due to a court order or to comply with a certain legal obligation. We will in that case make reasonable efforts to inform you in advance concerning this disclosure to other third parties. You will nevertheless recognise and understand that this is not always technically or commercially feasible in certain circumstances, or that legal restrictions may apply.

In no instance will we sell your personal data or make it commercially available to direct marketing agencies or similar service providers, unless with your prior consent.

9. TECHNICAL AND ORGANISATIONAL MEASURES

We take the necessary technical and organisational measures to process your personal data according to an adequate level of security, and to protect this against destruction, loss, forgery, alteration, unauthorised access or accidental disclosure to third parties, as well as any other unauthorised processing of this data.

In no instance can the Denys group be deemed liable for any direct or indirect damage resulting from incorrect or unauthorised use of personal data by a third party.

10. THIRD-PARTY ACCESS

In order to process your personal data, we provide access to your personal data to our employees, colleagues and appointees. We guarantee a similar level of protection by making contractual obligations opposable to these employees, colleagues and appointees, which are similar to this Data Protection Notice.

11. FURTHER QUESTIONS

If, after reading this Data Protection Notice, you have any further questions or comments relating to collecting and processing your personal data, please contact the Denys group, either by post to Industrieweg 124, 9032 Wondelgem or by email to dataprotection@denys.com.