



## CUSTOMER (B2B) DATA PRIVACY POLICY

### INTRODUCTION

Modulaire Group (“**Modulaire**”, “**we**”, “**us**”, “**our**”) respects your privacy and is committed to protecting your personal data.

This Customer (B2B) Data Privacy Policy (“**Policy**”) explains how we handle and treat your personal data when you use the products or services that Modulaire provides. The Policy explains our approach to any personal data that we collect from you or that we have obtained about you from a third party and the purposes for which we process your personal data. It also sets out your rights in respect of our processing of your personal data.

We may collect personal data from you in the course of our business, including through your use of our B2B websites/platforms, when you contact or request information from us, or as a result of your relationship with one or more of our staff or partners.

The scope of this Policy as detailed below is the processing of personal data concerning Customers and Prospects contacts (“**you**”, “**your**”) carried out by Modulaire or on its behalf, in the context of marketing, operating and supporting Modulaire business operations, provision of Modulaire products and services to Customers and management of Customer relationship.

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 geographies areas where Modulaire operates.

### CONTROLLER

Modulaire Group is made up of different legal entities, details of which can be found in Appendix 1 to this Policy. This Policy is issued on behalf of the Modulaire Group so when we mention “Modulaire”, “we”, “us” or “our” in this Policy, we are referring to the relevant company in the Modulaire Group responsible for processing your data. We will let you know which entity (including the relevant contact details) will be the controller for your data when we enter into a contract with you and/or at the stage of negotiations. Alternatively, if you have any questions, please contact us at [privacyquestions@modulairegroup.com](mailto:privacyquestions@modulairegroup.com).

### WHAT PERSONAL DATA DO WE COLLECT AND HOW?

During the course of our commercial relationship and to the extent this is reasonably necessary for managing it or for purposes of entering into a commercial relationship with you, for compliance requirements, or for our legitimate business purposes, Modulaire collects personal data concerning Customers and Prospects.

Modulaire may collect your personal data directly from you on the basis of collection forms, official documents, or indirectly from other entities within Modulaire if you have previously been in a commercial relationship or enquired about Modulaire products and services by another entity of the

Modulaire group, and through professional advisors. The categories of personal data Modulaire may collect include, without limitation, the following:

- identification data, images;
- professional life (e.g., title, professional contact details, professional address, e-mail addresses);
- economic and financial data (e.g., banking details, tax situation); and
- information resulting from previous orders (e.g., order history, payments)

Modulaire collects and processes your personal data only if it is justified by a legal basis described below.

#### **WHY DOES MODULAIRE COLLECT YOUR PERSONAL DATA?**

We use your personal data for the purposes listed below. Whenever we process your personal data, we do so on the basis of a lawful "justification" (or lawful basis) for processing, which we have identified in the table below.

<b>Purposes</b>	<b>Legal Basis</b>
Administrative management of Customers and Prospects, including management of Customers and Prospects databases, management of Customers and Prospects files and payment management	Performance of the commercial agreements  Compliance with Modulaire legal and regulatory obligations as per applicable law
Recording of telephone calls for purposes of staff training and products / services improvement	Modulaire's legitimate interest to ensure the quality of its services and the professional training of its employees
To comply with our legal obligations in terms of client verifications (including any Know Your Client, Anti-Money Laundering or Anti-Bribery regulations), and its internal policies	Compliance with Modulaire's legal and regulatory obligations  Modulaire's legitimate interest to ensure that its internal policies are respected
Management of litigations, offences and court cases	Modulaire's legitimate interest to ensure its defence
Storage of Customers and Prospects personal data	Compliance with Modulaire's legal and regulatory obligations, as per applicable law, to keep certain Customer or Prospects personal data to comply with the applicable statute of limitations and respond to Data Subjects requests or claims (e.g., opt-out from commercial communications)
Reporting to the management and to Modulaire's parent company, notably to apply a globally consistent approach as far as Customers and Prospects management are concerned, to facilitate the efficient operation of the Modulaire group's business, notably by capturing, analyzing and reporting the data relating to Modulaire Customers and Prospects	Modulaire's legitimate interest to ensure consistency throughout the Modulaire group and optimize its commercial relationship with its Customers and Prospects and resources
Marketing and prospection	We rely on your consent to collect

	information for the organization of marketing activities where you may be involved, to better serve you
In contemplation of and/or in connection with a business transaction such as a merger, or a restructuring, or sale	Modulaire's has a legitimate interest as we need to be able to make decisions relating to the future of our business in order to preserve or develop our business operations

If you are an employee of one of Modulaire's corporate Customers or Prospects, we only use your contact information for the management of the relationship with your employer and preserve our business operations with your employer.

**IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, this may result in our inability to provide you with the information, products or services you have requested, or to manage your contractual relationship with Modulaire.

**DATA SECURITY MEASURES**

We protect any personal data processed in the context of our business activities by following the relevant usage, technical and organizational policies, standards and processes, in line with this Policy.

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

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

Personal data is only kept for the period necessary for the purpose of the processing in accordance with Modulaire applicable Personal Data Retention Procedure (more details about this Procedure and specific retention periods are available on request using the contact information set out below). We keep your personal data as long as it is necessary for the purposes for which they were collected.

We keep your personal data for the time strictly necessary for the management of the relationship with our Customers or Prospects.

In addition, we may store some of your personal data in the following cases:

- for commercial prospection purposes, for a period of 3 years from the end of the commercial relationship with our Customer, or from our last contact with a Prospect;
- to comply with a legal or regulatory requirement and comply with applicable statute of limitation requirements. In such case, your personal data will be archived and retained for the duration imposed by applicable law, or for the duration of the applicable statute of limitations; and/or
- to defend against legal or contractual action, in which case the personal data may be retained until the end of the corresponding statute of limitation.

When your personal data will no longer be necessary, we will delete or anonymize it.

**YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal

data. If you wish to exercise any of the rights set out below, please contact us at [privacyquestions@modulairegroup.com](mailto:privacyquestions@modulairegroup.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded or excessive (for example, it is repetitive or malicious). Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to:

- **Withdrawal of consent.** You can withdraw at any time your consent in respect of any processing of personal data based on your consent, without affecting the lawfulness of processing based on your consent before its withdrawal.
- **Access right.** You can ask us to confirm whether we process your personal data and, as the case may be, inform you of the characteristics of such processing, allow you to access such data and give you a copy of it.
- **Portability.** You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another data controller, but only where the processing is based on your consent or on the performance of a contract with you, and the processing is carried out by automated means.
- **Rectification.** You can request to correct or amend, any information which is incomplete, out of date or inaccurate.
- **Erasure.** You can request the deletion of your personal data (i) if such personal data is no longer necessary for the purpose of the personal data processing, (ii) You have withdrawn your consent (iii) You 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. Modulaire will take reasonable steps to inform the other entities of Modulaire of such erasure. We are not required to comply with your request notably if the processing of your personal data is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims.
- **Restriction.** You can request the restriction of the processing of your personal data (i) where the accuracy of the personal data is contested, the processing is unlawful, but you do not want it erased; it is still necessary to establish, exercise or defend legal claims; to verify the existence of overriding grounds following the exercise of your right of objection. We can continue to use your personal data following a request for restriction,

where: we have your consent; to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.

- **Right to object to processing justified on legitimate interest grounds.** Where we are relying upon legitimate interest to process personal data (see above), then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defense of legal claims.
- **Right to object to processing for marketing purposes.** Where we process personal data for direct marketing purposes, then you have the right to object to that processing at any time.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us (including change of title, professional contact or address or any other relevant change that may be relevant regarding the performance of your relationship with Modulaire) by contacting the relevant controller or contacting us at [privacyquestions@modulairegroup.com](mailto:privacyquestions@modulairegroup.com).

#### **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.

Disclosures are always made on a strictly limited 'need to know' basis where there is clear justification for transferring personal data.

Assurances will also be sought from the recipients that they will only use the personal data for legitimate / authorized purposes and keep it secure.

We share your personal data with:

- our third party service providers (e.g., hosting and maintenance of our IT systems, prospecting, emailing services, analytics, processing of payment), that process your personal data on Modulaire's behalf, as processors) for the purposes described above;
- our external advisers (lawyers, auditors, etc.), when necessary for the purposes of the legitimate interests pursued by Modulaire (e.g. sharing in the context of a merger and acquisition)
- our banks
- our employees including directors, managers, finance officers and/or administration teams, for the purposes of operational use; and/or
- other entities within Modulaire (see Appendix 1).

In addition to the above, if a particular disclosure is required to comply with a legal obligation (for instance, to a government agency or law enforcement body) or in connection with legal proceedings, generally the personal data may be provided to the extent legally required and, if permitted by law.

We do not carry out international transfers of personal data originating from Modulaire entities 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. However, 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, signature of European Commission model clauses, as appropriate, 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).

## 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.

## UPDATES TO THIS POLICY

As our business and the regulatory environments to which Modulaire and its affiliates are subject change regularly, this Policy may also change periodically. Therefore, Modulaire invites you to read this Policy posted on Modulaire’s website <https://www.modulairegroup.com/> on a regular basis and each time you are notified of changes, to check the updates.

## GLOSSARY

You will find below the definitions of key concepts referred to in this Policy.

- **Customer** shall mean any organization which is in a business relationship with Modulaire or has undertaken steps prior to entering into such relationship with Modulaire, including such organization’s personnel, comprised of all Data Subjects acting within or on behalf of such organization, regardless of their capacity or status (e.g., employees, interns, temporary workers, members, partners, contractors, business contacts, agents, representatives and directors).
- **Consent** shall mean any freely given specific and informed indication of the Customer’s agreement to the processing of his/her personal data.
- **Personal data** shall mean 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. 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.
- **Prospect** shall mean any organization which is not in a business relationship with Modulaire and towards which Modulaire has undertaken steps to market its products or services prior to entering into a business relationship, including such organization’s personnel, comprised of all Data Subjects acting within or on behalf of such organization, regardless of their capacity or status (e.g., employees, interns, temporary workers, members, partners, contractors, business contacts, agents, representatives and directors).

- **Sensitive Data means Special Category of Data** (which include 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 health or data concerning a natural person's sex life or sexual orientation) and **personal data relating to criminal convictions and offences**, (which due to their nature have been classified by law or by an applicable policy as deserving additional privacy and security protections).
- **Process(ed) / Processing** shall mean 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, organization, storage, access, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, making available, alignment, combination, blocking, deleting, erasure, or destruction (process shall 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.jesus@algeco.com">Luis.jesus@algeco.com</a> +351 263 006 368 +351 932 636 267
Belgium	Nancy Vande Reyd	<a href="mailto:Nancy.vandereyd@algeco.com">Nancy.vandereyd@algeco.com</a> M: +32 11 45 72 62

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