



## SUPPLIER DATA PRIVACY POLICY

### INTRODUCTION

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

The scope of this Supplier Data Privacy Policy (“**Policy**”) is the processing of personal data concerning suppliers carried out by Modulaire or on its behalf, in the context of operating and supporting its business operations and management of supplier relations. Modulaire defines a supplier as a person or organisation that provides goods or services that Modulaire needs or requests from you (“**Supplier/s**”, “**you**”, “**your**”). This Policy excludes any information about legal entities that supply goods or services, other than where details of their personal representatives are provided.

In the course of our business, including when we enter into a commercial contract with you; when you contact or request information from us; or as a result of your relationship with our employees, we may collect personal data from you. We are strongly committed towards the privacy of personal data, acting transparently and meeting our obligations in respect of data protection. Whenever you provide personal data to us, we will treat that data in accordance with this Policy, relevant legislation and best practice.

This Policy explains how we handle and treat personal data collected from you including, what data we collect; why we collect it; what we do with it; how we keep your personal data safe; and your individual rights in respect of us processing your personal data.

The Policy covers all personal data, in any form, including but not limited to electronic data, paper documents and disks that are under Modulaire’s possession or control. This Policy also covers all types of wholly or partly automated processing, as well as manual processing that forms part of a relevant filing system.

### 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 Suppliers.

Modulaire may collect your personal data directly from you on the basis of official documents and contracts, email exchanges, telephone enquiries etc. or indirectly from other entities within Modulaire if you have previously been in a commercial relationship with any of them. The categories of personal data Modulaire may collect include, without limitation, the following:

- Identity, identification data (e.g., forename and surname)
- Professional life (e.g., title, professional contact details, professional address, e-mail addresses);
- Economic and financial data (e.g., banking details, tax situation); and/or
- Information resulting from previous agreements (e.g., order history, payments).

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

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [privacyquestions@modulairegroup.com](mailto:privacyquestions@modulairegroup.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Modulaire does not collect or process special categories of personal data i.e. particularly sensitive information about its suppliers such as ethnic origin, sexual orientation or religious and/or political beliefs.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you or the company you represent as a new Supplier	Identity (e.g. name, job title)  Contact (e.g. email address, phone number, registered office address, organisation associated with etc.)	Performance of a contract  Legitimate interests of maintaining a database of suppliers for various goods and services we require on both an ongoing or historic basis (for example use of services used once a year - see below)
To process an order made by us including: - Manage payments, fees and charges - Collect and recover money owed to us	Identity (e.g. name, job title)  Contact (e.g. email address, phone number, registered office address, organisation associated with etc.)  Financial (e.g. bank details)  Transaction (e.g. commercial terms, goods and services supplied, price etc.)	Performance of a contract  Necessary for our legitimate interests in maintaining records of good and services ordered from specific suppliers

To manage our relationship with you or the company you represent which will include notifying you about changes to our terms or Policy	Identity (e.g. name, job title)  Contact (e.g. email address, phone number, registered office address, organisation associated with etc.)	Performance of a contract  Necessary to comply with a legal obligation
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity (e.g. name, job title)  Contact (e.g. email address, phone number, registered office address, organisation associated with etc.)	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  Necessary to comply with a legal obligation

#### **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, we may not be able to perform the contract we have or are trying to enter into with you as a Supplier.

#### **DATA SECURITY MEASURES**

Modulaire takes the security of your data very seriously. 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. This means that where relevant, electronic supplier data is stored securely via a secure server and password protected systems; financial information is stored within Modulaire’s chosen online banking systems and hardcopy information is locked away when not in operational use. Personal data is always subject to restricted access as appropriate.

Where Modulaire engages third parties to process personal data on its behalf in the course of its business operations, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate measures to ensure the security of personal data.

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

Personal data is only kept for the period strictly necessary for the purpose of the processing, in accordance with Modulaire’s 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). This usually means we keep your personal data for as long as the duration of the contract between us. However, this may be dependent upon the service requirements of Modulaire. For example, if we use a supplier service once a year we may maintain your details on our list of approved suppliers. Where we do not use your services for a period as specified in our Personal Data Retention Procedure, we will delete your data.

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

- to comply with a legal or regulatory requirement and any 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
- 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 is no longer 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:

- **Request access to your personal data (commonly known as a “data subject access request”).** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes**

**you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.**

- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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 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 - 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 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 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 or end of year accounting etc.);
- our banks;
- our employees including directors, managers, finance officers and/or administration teams, for the purposes of operational use; and/or
- other entities within the Modulaire Group (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 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).

## 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 is subject to change regularly, this Policy may also change periodically. Therefore, Modulaire invites you to regularly review this Policy posted on Modulaire’s website <https://www.modulairegroup.com/>.

## GLOSSARY

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

- **Consent** will mean any freely given specific and informed indication of the Data Subject’s agreement to the processing of his/her personal data.
- **Data Subject** will mean any individual person who can be identified, directly or indirectly, via an identifier and who the processing relates to.
- **Personal Data** will 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.
- **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** will 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**

Jurisdiction	Name	Contact Details
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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