

Privacy Statement for Construction Sites: what do we do with your personal data?

Dura Vermeer processes personal data of workers in the context of access control and time recording at its construction sites. In this Privacy Statement we describe what data of the data subjects Dura Vermeer processes, how this is done and what rights the data subject has in this regard. This Privacy Statement may be amended, for example, due to a change in the law. The website <https://www.duravermeer.nl/> shows the most recent version of the Privacy Statement for Construction Sites.

Why Dura Vermeer processes your personal data

Dura Vermeer processes your personal data so it can perform its activities to the best of its ability, all this in accordance with current statutory obligations. The personal data that are supplied to Dura Vermeer by you or by your employer, or that are generated by Dura Vermeer with regard to access control and logging of attendance at construction sites, are processed by Dura Vermeer for the following purposes:

- i. identification and authentication of workers who work at a construction site of a Dura Vermeer project;
- ii. establish whether workers have the required documents and certificates;
- iii. registration of hours worked for the purpose of the man-day register;
- iv. preventing/limiting Dura Vermeer's liability on the basis of the Dutch Wages and Salaries Tax and National Insurance Contributions (Liability of Subcontractors) Act, Dutch Wages and Salaries Tax and National Insurance Contributions (Liability of Hirers) Act, Dutch Labour Market Fraud (Bogus Schemes) Act, Dutch Posted Workers in the European Union (Working Conditions) Act and the Dutch Collective Agreement for the Building Industry & Infrastructure, Dutch Placement of Personnel by Intermediaries Act;
- v. comply with the Dutch Working Conditions Act;
- vi. promote safety at the construction site;
- vii. comply with the statutory requirements placed on Dura Vermeer. A number of examples of these statutory requirements are specified below under the heading "Statutory grounds for using personal data".

If Dura Vermeer wants to use personal data for another purpose that is not related to one of the purposes listed above, Dura Vermeer will always inform the data subject accordingly, for example, by amending this Privacy Statement for Construction Sites or by placing a message on the Dura Vermeer website.

Personal data of data subjects processed by Dura Vermeer:

Our guiding principle is that we will not process more data than is needed to facilitate access control and the logging of attendance at the construction site. We will receive the following personal data from your employer (or from you, if you complete the access control form yourself): name and address details, telephone number, e-mail address, date of birth, BSN (Dutch social security number), the number and term of validity of your ID, your VCA/VCA-VOL diploma (or equivalent diploma), clocking in and clocking out time, results of security test performed by data subject, and the answers to verification questions. If the Safety Check-in system is used during the preliminary registration, a passport photograph of the data subject is processed in low resolution. If the access control at the construction site takes place by using the Bouwplaats Check-in system, a finger scan of the data subject is converted into a unique access code. data subject and the passport photograph of data subject in low resolution [sic].

Statutory grounds for using personal data

Dura Vermeer uses your personal data because it is necessary to:

- comply with legal obligations borne by Dura Vermeer, such as obligations arising from the Dutch Foreign Nationals (Employment) Act, Dutch Placement of Personnel by Intermediaries Act, Dutch Labour Market Fraud (Bogus Schemes) Act, Dutch Working Conditions Act and/or
- represent the legitimate interests of Dura Vermeer or third parties. A legitimate interest is, for example, preventing or limiting the liability on the basis of the aforementioned legislation; and/or

- protect your own vital interests or those of other persons in the event of a serious accident at the construction site.

To whom can Dura Vermeer supply the personal data of data subjects?

Only those Dura Vermeer employees and contractors who need your personal data to perform their work for Dura Vermeer have access to your personal data on the systems of Dura Vermeer or its data processors. If we provide third parties with access to these data, Dura Vermeer will only do so if Dura Vermeer is certain that those third parties will only use the data in a manner and for a purpose related to the purpose for which Dura Vermeer obtained that data and only in accordance with this Privacy Statement. In some cases Dura Vermeer is required to provide third parties with certain personal data pursuant to a statutory obligation, as in the case of an inspection by the Ministry of Social Affairs and Employment.

The right of objection and other rights

Any data subject may object to the use of his personal data, for example, if he is of the opinion that the use of his personal data is not necessary to perform Dura Vermeer's activities or to comply with a statutory obligation. An objection can be lodged by sending an e-mail stating name, address, telephone number and a copy of a valid ID to the e-mail address listed under the heading "How to contact the Controller". **N.B.** Do not forget to make the passport photo and social security number (BSN) illegible before these are included. The email must clearly state what use of what data the objection relates to. Dura Vermeer will reply within one month.

Data subjects may also use the address details below to request and/or have their personal data corrected if the data subject is of the opinion that Dura Vermeer has incorrect personal data. Furthermore, each data subject has the right to ask Dura Vermeer to delete his personal data from their systems or transfer these to a third party to be designated by the data subject. Dura Vermeer will comply with this request unless Dura Vermeer has a legitimate interest in not doing so and this interest outweighs the privacy concerns of the data subject.

A data subject may also lodge a complaint about how Dura Vermeer uses his personal data. This can be done with the Dutch Data Protection Authority <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-over-gebruik-persoonsgegevens?qa=klacht>.

Storage periods

Dura Vermeer will only store data for as long as is necessary to carry out the activities described, unless Dura Vermeer is required to store the data of data subjects for longer pursuant to a statutory regulation.

How are the data of data subject protected?

Dura Vermeer takes all reasonable, appropriate security measures to protect the data subject against unlawful access or alterations, disclosure or destruction of personal data, whereby the current security standards are met.

How to contact the Controller

The controller of the personal data is Dura Vermeer Groep NV, which acts as the controller on behalf of all companies that are part of its group. To lodge an objection or make a request, please contact the Privacy Officer at Dura Vermeer Groep NV at the following address:

Dura Vermeer Groep NV
Rotterdam Airportplein 21
3045 AP Rotterdam, the Netherlands
+31(0)1022808700
privacyofficer@duravermeer.nl