Data Protection Policy

1. INTRODUCTION

Infra International Group; consisting of:

- Verbraeken Infra NV,
- GDD Infra NV,
- Dierickx Infra BV,
- Rousseaux Infra NV,
- Somaloue Infra NV,
- Fodetra-Hotton Infra NV,
- Etwal-Platteau Infra NV,
- Domotion BV,
- Keen & Wise BV,
- Stroppa BV,
- Maestro Pumps BV,
- Pumps & Projects BV,
- Jocla BV,
- Fluentis BV,
- FMT Office BV,
- Grondbalans NV,
- Wema NV,
- Wegro NV,
- Vermargo NV,
- Visser&Smit Hanab NV,
- Drillmat NV,
- Drilling Solutions NV,
- Hydroleaks NV,
- Pineur Curage BV,
- Hydrogaz NV,
- René Derullieux et fils BV,
- Canalco NV,
- Abba NV,
- Vansteenkiste NV,
- Graf Rohrleitungs- und Tiefbau GmbH,
- Stracke GmbH,
- CRT GmbH,
- De Waard Grondverzet,
- De Waard Transport & Overslag BV,
- Dijk Infra Solutions BV,
- Van Baarsen Holding BV,

- Van Baarsen Busleidingen BV,
- Van Baarsen Energie BV,
- Van Baarsen Materieeldienst BV,
- Locatra NV,
- Contôle et Maintenance NV,
- Qualiterre NV,
- Anti-Corrossion et Systèmes Associés NV,
- Beprol Services NV,
- Cabinet Jacques Pezou Services NV,
- MTP NV,
- Amthima Services NV,
- RELEC Services NV,
- STM NV,
- Métropole Travaux Public NV,
- Métropole Voirie et enrobe NV,

attaches great importance to the secure, transparent and confidential collection and processing of your personal data. In particular, we want to protect the data of our subcontractors and suppliers, among others, from loss, leaks, errors, unauthorised access or unlawful processing.

We want to inform you by means of this Data Protection Notice about the collection and processing of your personal data.

We ask that you read this Data Protection Notice carefully, as it contains essential information on how your personal data are processed and for what purpose.

By communicating your personal data, you explicitly declare to have taken note of this Data Protection Notice and you also explicitly agree to it, as well as to the processing itself.

2. SCOPE

This Data Protection Notice covers all services provided by us and, in general, all activities we carry out.

3. CONTROLLER AND ITS COMMITMENTS

Verbraeken Infra, with registered office at Haverheidelaan 10, 9140 Temse and with company number 0427.173.350, is the controller of your personal data.

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

4. PERSONAL DATA

Depending on your activities and your relationship with our company, you will provide us with the following personal data: your identity and contact details (name, title, address, e-mail address, telephone and mobile phone number). For certain specific legal obligations (electronic attendance registration, 30bis

declaration of works), you may provide us with additional data to register your attendance (such as E-ID data, Limo number). In order to be able to settle the works carried out or goods ordered, you will also provide us with your financial data such as your bank account number, IBAN number).

We kindly remind you that you bear responsibility for all the data you provide us with and that we rely on their accuracy. Should your data no longer be up-to-date, please inform us by return.

You are not obliged to communicate your personal data, but you understand that the provision of certain services or cooperation will become impossible if you do not consent to their collection and processing.

5. PROCESSING PURPOSES AND LEGAL BASIS

5.1 Data of suppliers and subcontractors

We collect and process the identity and contact data, attendance registration data and financial data of our suppliers and subcontractors, as well as their subcontractor(s) (if any), their staff, employees, appointees and other useful contacts. The purposes of these processing operations are the execution of this agreement, management of the suppliers/subcontractors, accounting. The legal grounds are the performance of the agreement, the fulfilment of legal and regulatory obligations (such as, for example, the mandatory electronic attendance registration, the 30bis declaration of works, the attendance list or other obligations in public contracts, etc.) and/or our legitimate interest. For electronic attendance registration, E-ID data or Limosan number are also processed where applicable.

5.2 Staff data

We process our employees' personal data as part of our personnel management and payroll administration. Given its specific nature, this processing is regulated more comprehensively in an Employee Data Protection Policy.

5.3 Other data

In addition to supplier/subcontractor and employee data, we also process personal data of others, such as potentially useful contacts within our industry, network contacts, expert contacts, etc. The purposes of this processing are in the interest of our operations and public relations. The legal basis is our legitimate interest or in some cases the performance of a contract.

6. DURATION OF PROCESSING

Personal data will be kept and processed by us for a period necessary in function of the purposes of the processing and in function of the (contractual or non-contractual) relationship we have with you.

Data of suppliers or subcontractors will in any case be deleted from our systems after a period of seven years following the termination of the agreement or project, except with regard to such

personal data which we are required to retain for a longer period on the basis of specific legislation or in the event of an ongoing dispute for which the personal data are still necessary.

7. **RIGHTS**

In compliance and under the terms 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 and inspection: you have the right to acquaint yourself, free of charge, with the data we hold about you and to find out what it is used for.

- Right to rectification: you have the right to obtain rectification (correction) of your incorrect personal data, as well as to complete incomplete personal data.

- Right to data erasure or restriction: you have the right to request us to erase or restrict the processing of your personal data in the circumstances and under the conditions stipulated by the General Data Protection Regulation. We may refuse the data erasure or restriction of any personal data necessary for us to fulfil a legal obligation, the performance of the contract or our legitimate interest, and for as long as this data is necessary for the purposes for which it was collected.

- Right to data portability: you have the right to obtain the personal data you have provided to us in a structured, common and machine-readable form. You have the right to transfer this data to another controller.

- Right to object: you have the right to object to the processing of your personal data for serious and legitimate reasons. However, please note that you cannot object to the processing of personal data necessary for us to fulfil a legal obligation, the performance of the contract or our legitimate interest, and for as long as this data is necessary for the purposes for which it was collected.

- Right to withdraw consent: If the processing of personal data is based on prior consent, you have the right to withdraw this consent. These personal data will then only be processed if we have another legal basis for doing so.

- Automatic decisions and profiling: we confirm that the processing of personal data does not involve profiling and that you will not be subject to fully automated decisions.

You may exercise the aforementioned rights by contacting the data processing service. The contact person for this is: Ms Pauline Schockaert with contact details: pauline.schockaert@verbraeken-infra.eu; 0473 76 20 82.

We make every effort to handle your personal data in a careful and legitimate manner in accordance with the applicable regulations. If, nevertheless, you consider that your rights would have been

Violated and you would not find a hearing within our company for your concerns, you are free to lodge a complaint with:

Commission for the Protection of Privacy

Rue du Printing Press 35, 1000 Brussels

Tel. 02 274 48 00

Fax. 02 274 48 35

E-mail: commission@privacycommission.be

You may additionally apply to a court if you believe that you would suffer damage as a result of the processing of your personal data.

8. TRANSFER TO THIRD PARTIES

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

It is possible that one or more of the above-mentioned third parties may be located outside the European Economic Area ("EEA"). However, personal data will only be transferred to third countries with an adequate level of protection.

The employees, managers and/or representatives of the above-mentioned service providers or institutions and the specialised service providers appointed by them must respect the confidential nature of your personal data and may only use these data for the purposes in the context of which they were provided.

If necessary, your personal data may be passed on to other third parties. This may be the case, for example, if we were to be reorganised in whole or in part, if our activities were to be transferred or if we were to be declared bankrupt. Personal data may also have to be passed on pursuant to a court order or to comply with a particular legal obligation. In such a case, we will make reasonable efforts to inform you in advance of such communication to other third parties. However, you will recognise and understand that in certain circumstances this may not always be technically or commercially feasible or legal restrictions may apply.

Under no circumstances will we sell or make your personal data commercially available to direct marketing agencies or similar service providers, except 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 security level and to protect them against destruction, loss, falsification, modification,

unauthorised access or notification by mistake to third parties, as well as any other unauthorised processing of these data.

Under no circumstances can Verbraeken Infra be held liable for any direct or indirect damage resulting from wrong or unlawful use by a third party of the personal data.

10. ACCESS BY THIRD PARTIES

For the purpose of processing your personal data, we grant access to your personal data to our employees, associates and appointees. We guarantee a similar level of protection by making contractual obligations opposable to these employees, associates and appointees, which are similar to this Data Protection Notice.

10. ANY QUESTIONS?

If, after reading this Data Protection Notice, you have further questions or comments regarding the collection and processing of your personal data, please contact Pauline Schockaert either by mail to Haverheidelaan 10, 9140 Temse or by e-mail to pauline.schockaert@verbraeken-infra.eu.

Infra International NV

Offices
Haverheidelaan 12
B-9140 Temse
België

T +32 (0) 3 766 23 00
F +32 (0) 3 766 29 37
info@infra-international.eu
www.infra-internatianal.eu

BTW BE 0721.453.336
RPR Gent, afdeling Dendermonde
IBAN BE70 3631 8571 4725
BIC BBRUBEBB