



## Processing personal data

### 1. Introduction

The controller, Infra Group NV (hereinafter "Infra"), with registered office at Haverheidelaan 10, 9140 Temse, with company number 0827.023.681, attaches great importance to correct collection and processing of your personal data.

This note applies to all services provided by Infra and all activities carried out by Infra. We ask you to read this note with due care.

By sharing your personal data with us, you expressly declare that you have read this Data Protection Privacy Notice and expressly consent to the processing of such data.

When collecting and processing your personal data, Infra respects Belgian regulations on personal data protection as well as the General Data Protection Regulation ("AVG") as of its entry into force on 25/05/2018.

### 2. Personal data

According to your activities and your relationship with Infra, you will provide us with the following personal data: your identity and contact details (name, title of address, address, email address, telephone and mobile phone number). For certain specific legal obligations (electronic attendance registration, Declaration of Works 30bis), we may ask for additional data to register your attendance (e.g. your eID data or Limosan number).

You are responsible for the completeness and reliability of the data you provide to us. If your data should no longer be up-to-date, please inform us as soon as possible.

### 3. Processing purposes and legal basis

#### 3.1. Customer details

As part of its services and activities, Infra collects and processes the identity and contact details of its customers (both current and potential) and clients and of their staff, employees, appointees and other useful contacts. These processing operations contribute to the negotiation and execution of agreements with the relevant co-contractors, customer and service provider management, accounting and direct marketing activities such as sending promotional or commercial information. The legal grounds are the negotiation and performance of the relevant contracts, the fulfilment of legal and regulatory obligations (such as the Declaration of Works 30bis) and/or the legitimate interest of Infra.

#### 3.2. Details of suppliers and subcontractors

Infra collects the identity and contact details of its suppliers and subcontractors and any of their (sub)contractors, staff, employees, appointees and other useful contacts. These processing operations contribute to the negotiation and execution of agreements with the relevant co-contractors, management of suppliers, subcontractors and service providers, accounting and direct marketing activities such as sending promotional or commercial information. The legal grounds and purposes are the negotiation and execution of the contract, the fulfilment of legal and regulatory obligations (such as, for example, the mandatory electronic attendance registration, the Declaration of Works 30bis, the



attendance list or other obligations in public procurement, etc.) and/or Infra's legitimate interest. For the electronic attendance registration, eID data or Limosan number will be processed if necessary.

### 3.3. Staff data

Infra collects and processes the personal data of its employees for personnel management and payroll purposes. Due to its specific nature, the processing of this data is regulated more comprehensively in an Employee Data Protection Policy.

### 3.4. Other data

Besides data of customers, suppliers, subcontractors, service providers and staff, Infra also processes personal data of others, such as new or potential customers, useful contacts within relevant sectors, network contacts, experts, direct marketing contacts, etc. These processing operations are in the interest of our operations, direct marketing and public relations. The legal grounds are Infra's legitimate interest and/or in certain cases the performance of an agreement.

## 4. Duration of processing

Personal data will be kept and processed for a period necessary in function of the purposes of the processing and in function of the relationship (contractual or otherwise) between the parties involved. Customer data and data of suppliers or subcontractors will in any case be deleted from Infra's systems after a period of ten years following the termination of the agreement or project, unless it concerns data that Infra is required to keep for a longer period on the basis of specific legislation or in case of an ongoing dispute for which the personal data is necessary and/or useful.

## 5. Rights

In accordance 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 INFRA holds on 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 and to complete your incomplete personal data.

Right to data erasure or restriction: you have the right to request Infra to erase or restrict the processing of your personal data in the circumstances and under the conditions stipulated by the General Data Protection Regulation. Infra may refuse data erasure or restriction of personal data necessary for payroll administration, the performance of a contract or its legitimate interest and that as long as the 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 Infra 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, you cannot object to the processing of personal data that Infra requires for the performance of 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. This personal data will then only be processed if Infra has another legal basis for doing so.

Automated decisions and profiling: Infra confirms that the processing of personal data does not involve profiling and that you will not be subject to fully automated decisions.

You can exercise the above rights by contacting [privacy@infra-group.be](mailto:privacy@infra-group.be).

## 6. Transfer of data to third parties

Certain employee personal data collected by the employer will be transmitted to and possibly processed by third parties (such as the IT supplier, accountant, auditor, etc.) as well as by the public authorities (e.g. the Declaration of Works 30bis, the electronic attendance registration or when competing for public contracts).

It is possible that one or more of the above 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 service providers or institutions mentioned above and the specialised service providers appointed by them must respect the confidential nature of your personal data and may only use them for the purposes for which they were provided.

If necessary, your personal data may be passed on to other third parties. This could be the case if Infra is reorganised in whole or in part, its activities are transferred or if it is declared bankrupt. Your personal data may also have to be transferred because of a court order or to comply with a particular legal obligation. In such case, Infra will make reasonable efforts to inform you in advance of such transfer to other third parties. However, you acknowledge and understand that in certain circumstances this may not always be technically or commercially feasible or legal restrictions may apply.

Infra will under no circumstances sell your personal data or make it commercially available to direct marketing agencies or similar service providers, except with your prior consent.

## 7. Technical and organisational measures

Infra takes the necessary technical and organisational measures to process your personal data at an adequate level of security and protect it from destruction, loss, falsification, unauthorised access or notification by mistake to third parties, as well as any other unauthorised processing of this data.



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

#### 8. Third-party access

For the purpose of processing your personal data, Infra grants access to your data to its employees, associates, appointees and subcontractors. Infra guarantees a similar level of protection by imposing contractual obligations on these employees, associates, appointees and subcontractors.

#### 9. Other

If, after reading this data protection note, you have any further questions or comments regarding the collection and processing of your personal data, please contact: [privacy@infra-group.be](mailto:privacy@infra-group.be).

