

Personal Data Protection Policy

Status: March 12, 2020

Protection and respect to privacy is very important for us. Therefore, the rules set forth by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "GDPR") are fully respected by all entities belonging to VGP group. In this document by terms "VGP" or "us" is meant the member of VGP group, that you are in a legal relation with, as described below.

Please find bellow our Data Processing Policy describing the way in which VGP handles personal data collected from their business partners and other third parties.

Which personal data do we process?

With regard to the personal data of our business partners and their representants, job applicants and other third persons, we are in a position of data controller. Please be aware that only personal data of natural persons are regulated by GDPR, not the data of the companies. Mostly we use identification and contact details only. Within the recruitment process we process all the personal data that are sent to us by the respective candidate.

How do we use your personal data?

VGP always ensures confidentiality, integrity and availability of the personal data processed. All the data are processed only for legitimate purpose and limited to what is necessary in relation to such purpose. We place a strong emphasis on appropriate security and organizational measures, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage. Our internal processes are regularly reviewed.

We may use your personal data in connection with:

- fulfilment of our contractual relationship, resp. the contractual relationship between VGP and your company;
- trade negotiations with you and your company;
- recruitment;
- sending newsletter and other P2P communication.

If we do enter into a business relation or negotiations, we may send you from time to time a message informing you on our new achievements and other information. This is our legitimate interest to let you know about our activities, however, you always have a right to withdraw from our list and raise an objection as described below.

If you subscribe for newsletters, we are happy to share our news with you until you decide to withdraw from our list of subscribers. You can do that at any time and it will be immediately taken into consideration. Further information is enclosed in each respective newsletter.

Recruitment Process

We use your name, email address, telephone number, country of residence, information about your professional interests, and any other details you choose to share with us when enclosing your application documents (including your CV) or when completing the form. We use the above data to manage your application and to contact you in matters related to your recruitment process.

If the position you applied for is filled by another candidate and we wish to keep your CV anyway, you are free to give us your consent. You can withdraw your consent at any time without any consequences. After withdrawing your consent, your data will not be used any more.

Who do we share your personal data with?

We share your personal data in the following cases:

- when this is required by applicable laws, in particular at the request of the state authorities;
- when this is necessary in pursuit of our needs, in particular by law firms or other members of VGP group.

In addition, your personal data may be shared with service providers – parties which process personal data at our request or on our behalf, such as providers of ICT services, such as hosting, and supply or maintenance of computer systems and applications. Your personal data are shared with service providers under data processing agreements whereby they are required to follow our instructions.

For how long do we process your personal data?

We process your personal data for as long as this is necessary to accomplish the specific purpose of processing. In some cases, we are obliged by the provisions of law to process personal data for a specific time (i.e. the obligation to retain contractual information after termination of a respective agreement). We will erase your data when we no longer need it to accomplish the purpose for which it was collected or after the expiry of the period specified in the provisions of law.

Do we transfer your personal data outside the European Economic Area?

We do not transfer your data outside the EEA. Should this prove necessary in the future, we will always ensure appropriate personal data safeguards and will fulfil the obligations set forth in GDPR or related provisions of law.

What rights do you have?

You have the right to request access to your personal data, request a copy of the personal data you have submitted to us and demand that it be provided to you or other party named by you, request that your data be rectified when incomplete or incorrect; request that all or some of your personal data be erased, request restriction of the use of your personal data.

You also have the right to:

- **object**, on grounds related to your particular situation, against the use of your personal data on the basis of our legitimate interests. Following such an objection, we will consider whether – on account of your particular situation – the protection of your interests, rights and freedoms overrides the interests we pursue in using your personal data. If your objection proves to be justified and there is no other legal basis for the use of the data, we will erase them.
- **withdraw your consent** to the use of your personal data at any time, if we process your data based on your freely given consent.

You are also entitled to file a complaint to the supervisory authority relevant for your place of employment or residence.

How you can contact us?

You can contact us in any matters related to the use of your personal data, also when you wish to object to the processing of your personal data and exercise your rights in this respect, by sending us an email message to: dataprotection@vgpparks.eu or by sending a registered letter to the statutory seat of the respective VGP entity.

This policy is applicable by the following entities: VGP NV (Belgium), VGP FOUNDATION, Private foundation (Belgium), VGP – industriální stavby s.r.o. (Czech Republic), VGP FM Services s.r.o. (Czech Republic), SUTA s.r.o. (Czech Republic), VGP – industriálne stavby s.r.o. (Slovakia), VGP Industriebau GmbH (Germany), VGP PM Services GmbH (Germany), FM Log.In.GmbH (Germany), VGP Naves Industriales Peninsula SLU (Spain), VGP Costruzioni Industriali SRL (Italy), VGP Proiecte Industriale Srl (Romania) and VGP Services Kft (Hungary) as well as all project companies (which regularly do not process personal data and leave such processing to the foregoing VGP entities – management companies).