

## PERSONAL DATA POLICY

### Personal data control at Global Tunnelling Experts

#### We take protection of your personal data very seriously

Global Tunnelling Experts have adopted this personal data policy, which applies to all group employees in connection with the processing of personal data.

The personal data policy contains a description of how we process personal data about our employees, customers, partners, suppliers and other parties, about whom we process personal data as part of our work or for the fulfilment of other purposes. Below only the term 'customers' is used, irrespective of the fact that this policy also applies to the above other parties about whom the company processes personal data.

Global Tunnelling Experts use cookies on the company's website. In this connection, we refer to the cookie policy, which can be found on our website <https://www.global-tunnelling-experts.com>.

To protect your personal data as well as possible, we continually assess how high the risk is that our data processing will negatively affect your fundamental rights. We are particularly aware of the risk that you are exposed to discrimination or ID theft or suffer a financial loss, loss of reputation or data confidentiality.

#### About Global Tunnelling Experts

The Global Tunnelling Experts group consists of the following six companies:

- Global Tunnelling Experts B.V., which is situated at 2900 AK Capelle aan den IJssel in the Netherlands;  
P.O Box 419 E: [info@global-tunnelling-experts.com](mailto:info@global-tunnelling-experts.com)
- Global Tunnelling Experts (Danmark) ApS, Gulagervej 3, 4173 Fjenneslev, Denmark;  
E: [denmark@global-tunnelling-experts.com](mailto:denmark@global-tunnelling-experts.com)
- Global Tunnelling Experts UK Ltd., Unit 2 Gordano Court, Serbert Close, Bristol – BS20 7FS, United Kingdom;  
E: [uk@global-tunnelling-experts.com](mailto:uk@global-tunnelling-experts.com)

- Global Tunnelling Experts Qatar, Mohajl House 29 AliBin Abi Talib Street, Doha, Qatar;  
P.O Box 16095
- Global Tunnelling Experts Turkey, Sogut Sokak Agaoglu 1453 Sitesi, A4 Blok Kat 12 Daire 86 Sanyer /  
Istanbul, Turkey  
E: info@global-tunnelling-experts.com
- Global Tunnelling Experts Germany, Im Heidenwinkel 5, 77963 Schwanau , Germany.  
E: info@global-tunnelling-experts.com

We are data controllers

When we process personal data about our customers, partners, suppliers and others (typically employees or contact persons) as part of the operation of our business, we are to be considered as data controllers. We are also data controllers when we process personal data about our employees. Below we have stated the typical situations on the basis of our relation to you.

#### Processing of personal data about you if you are an employee with our customers, suppliers or partners

When we process personal data about you or for you – including contact details of the employees, etc. of our customers, suppliers and partners – we do so to enter into or perform an agreement with our customers. There will also be situations where, for the group’s own purposes, we must process personal data about other parties with relations to the customer or the job.

We assess whether a basis exists for collecting and processing personal data; which data are necessary and relevant; and for how long the personal data must be stored.

When we are data controllers in relation to your personal data, it means that we must ensure protection of the rights you enjoy under personal data legislation (see the section “Your rights”).

#### Processing of personal data about employees

We are data controllers of the personal data we collect and process about our employees – present, potential and former employees – and we must ensure protection of the rights enjoyed by our employees under personal data legislation. Global Tunnelling Experts have prepared a separate policy for the processing of personal data about our employees as well as job applicants, which you find [here](#).

## Contact details

You are always welcome to contact your nearest Global Tunnelling Experts office if you have questions about our processing of your personal data.

Global Tunnelling Experts have appointed Global Tunnelling Experts (Danmark) ApS as the point of contact for questions about Global Tunnelling Experts' processing of personal data:

Global Tunnelling Experts Denmark  
Gulagervej 3  
DK-4173 Fjenneslev  
Contact: Claus Nielsen  
E: [gdpr@global-tunnelling-experts.com](mailto:gdpr@global-tunnelling-experts.com)

Global Tunnelling Experts consist of a group of companies, which are all joint data controllers in relation to the data that Global Tunnelling Experts process about you. You can find further information about the companies and the joint controller responsibility here. [\(link\)](#)

Global Tunnelling Experts Turkey, Global Tunnelling Experts Qatar and Global Tunnelling Experts UK Ltd. are unsecure third countries. The Global Tunnelling Experts group has therefore concluded Standard Contractual Clauses adopted by the European Commission to ensure sufficiently protection of personal data shared with these group companies.

When we ask you to make your personal data available to us, we inform you about which data about you we process and for which purpose. You receive the information at the time when we collect your personal data.

If we collect data about you from others, e.g. a supplier, authority or partner, we inform you about it within 30 days of having collected your personal data – but usually sooner. We also inform you about the purpose of the collection and the legal basis entitling us to collect your personal data.

## Processing of personal data

### We use several types of personal data

We use the personal data that are necessary and relevant for the performance of the specific jobs for our customers.

The data we use may – depending on the nature of the task – include:

#### General personal data

General personal data include information about a person's name, contact details and position. The nature of the data we collect depends on the nature of the purpose.

#### Personal identification numbers

Personal identification numbers are processed only for employees in the group, and we do not need your personal identification number in connection with a job application; see further details in the group's **policy for the processing of personal data for recruitment purposes, which you find [here](#)**.

### Sensitive data

We do not process sensitive personal data about the employees of our customers, suppliers or partners.

### **We collect and store your personal data for specific purposes**

We collect and store personal data for specific purposes in connection with the performance of jobs for our customers or as part of our own business purposes.

The background for our processing of personal data is to perform a job or enter into and perform an agreement with our customer.

### **We only process relevant and necessary personal data**

We only process personal data about you that are relevant and adequate for the purposes defined above. Hence, we do not use personal data other than those needed for a specific purpose.

Otherwise, we only process the personal data that are necessary for the fulfilment of our identified purposes.

The type of personal data that is necessary to collect and store for the operation of our business may have been laid down by law. The type and scope of the personal data we process may also be necessary to perform a contract or other legal obligation resting on us according to the law.

With a view to ensuring that we only process relevant and necessary personal data for each of our determined purposes, we ensure that we only collect the necessary amount of data. We also ensure through internal guidelines that the scope of processing is not unnecessarily large and that the storage period is not too long.

To protect you against unauthorized persons getting access to your personal data, we use IT solutions and have adopted guidelines that ensure that personal data are only accessible for relevant employees.

### **We check and update your personal data**

We check that the personal data we process about you are not inaccurate or misleading. We also ensure to update your personal data on an ongoing basis.

As our service depends on your personal data being correct and updated, we ask you to inform us about relevant changes in your personal data. You can contact your nearest Global Tunnelling Experts office, or use the contact details of our personal data officer stated above, to notify us of changes in your personal data.

To ensure the quality of your personal data, we have adopted internal rules and established procedures for checking and updating your personal data.

### **We erase your personal data when they are no longer necessary**

We erase your personal data when they are no longer needed for the purpose for which we collected, processed and stored the personal data in question.

Personal data collected in connection with the performance of specific jobs will be stored for an adequate period of time after the end of the job. This will usually be a period of seven years. If data about you in a specific context are kept for a longer period, you will be notified to this effect in connection with the collection of the data.

Personal data about our employees are stored for a period of seven years after the end of the employment relationship. The storage period has been determined on the basis of the statute of limitations with the longest deadline for claims arising from the employment relationship and its termination, and which Global Tunnelling Experts are obliged to observe. You can read more about our policy for processing personal data about our employees as well as job applicants, which you find [here](#).

### **We always have a legal basis for processing your personal data**

When we process your personal data, we ensure that we always have a legal basis for processing your data.

Most often, we process your data to be able to enter into and perform an agreement with our customers and on the basis of our legitimate interest in processing your personal data.

If we want to use your personal data for a purpose other than the original one, we inform you about the new purpose and – if necessary – we ask for your consent before we start processing data. If we have another legal basis for the new processing, we notify you accordingly.

### **We do not disclose your personal data without a legal basis**

We always ensure that a legal basis exists before we disclose your personal data to a third party.

We do not obtain your consent if we are legally obliged to disclose your personal data.

## **Security**

### **We protect your personal data and have internal rules about data security**

We have adopted internal rules about data security, which contain instructions and measures that protect your personal data against destruction, loss or alteration, against unauthorized disclosure and against unauthorized access to or knowledge of them.

We have established procedures for the allocation of access rights to those of our employees who process any personal data that contain information about personal interests and information that is otherwise considered

confidential. We check the actual access through supervision. To avoid data loss, we continually back up our data.

In case of a security breach that results in a high risk of discrimination, ID theft, financial loss, loss of reputation or other significant inconvenience for you, we will notify you about the security breach as soon as possible and in accordance with the provisions laid down in law.

If your personal data are processed by an external partner/sub supplier, e.g. in connection with a cloud solution, we ensure that a data processing agreement has been made, and that the partner in question has adequate security procedures in place and that compliance with such procedures is audited on an ongoing basis, e.g. by the use of IT suppliers who maintain relevant certification about IT and data security.

## **Your rights**

### **You have the right of access to your personal data**

You have the right at any time to be informed of which personal data we process about you, from where they originate and for which purpose we use them. You can also obtain information about for how long we store your personal data and about who receives personal data about you, to the extent that we disclose your personal data.

If you submit a request, we can inform you about the personal data we process about you. Access may, however, be limited for the protection of other people's privacy, business secrets and intellectual property rights.

### **You have the right to have inaccurate personal data corrected or erased**

If you think that the personal data we process about you are incorrect, you have the right to have them corrected. You must contact us and inform us of the nature of the inaccuracies and how they can be corrected.

In some cases, we will be obliged to erase your personal data. This applies, for example, if you withdraw your consent, and we have no other legal basis for the processing of your personal data. If you think that your personal data are no longer necessary in relation to the purpose for which we collected them, you can ask us to have them erased. You can also contact us if you find that your personal data are processed in contravention of the law or in breach of other legal obligations.

When you contact us with a request to have your personal data corrected or erased, we examine whether the conditions have been met, and if that is the case, we implement corrections or erasure as soon as possible.

### **You have the right to object to our processing of your personal data**

You have the right to object to our processing of your personal data. You may also object to our disclosure of your data for marketing purposes. You can use the contact details above to send an objection. If your objection is justified, we will cease the processing of your personal data.

### **You have the right to receive your own data in electronic form (right to data portability)**

You have the right – in electronic form – to receive the personal data which you have provided to us and the data we have collected about you from other players on the basis of your consent. If we process personal data about you as part of a contract in which you are a contracting party, you can also receive your data.

If you want to exercise your right to data portability, you will receive your personal data from us in a commonly used format by e-mail.

If you want access to your data, have them corrected or erased, or to object to our data processing, we examine whether it is possible and reply to your request as soon as possible and no later than one month after having received your request.

**You can complain about wrongful processing of your personal data**

If you think that your personal data are being wrongfully processed, you should first discuss this with your contact at Global Tunnelling Experts. You can also complain to the person designated by the group as responsible for personal data issues.

If you think that your personal data are not processed correctly, you can complain to the relevant data protection authority.