

**THINKING
LABOUR?
THINK CENTUM**

PRIVACY POLICY

Centum Holdings Ltd, Centum (NI) Ltd, Centum Construction services (Europe) Ltd and any other group company "Centum", its subsidiaries and affiliates ('we' or 'our'), are committed to protecting and respecting your privacy. This policy (together with our terms of use and any other documents referred to in it) sets out how we collect, use, and protect your personal information, and your rights in relation to that information. Centum processes personal data in accordance with the data protection laws that are applicable within the United Kingdom. For any queries relating to data protection, please contact Centum, 41A Monaghan Street, Newry. Co.Down. BT35 6AY, or by email to info@centumni.com.

Personal Data

Centum will not collect any personal data about you when accessing this website or mobile apps except where it is specifically and knowingly provided, or where it is necessary for us to process for the purposes of the provision of goods or services, and where there is a valid legal basis for doing so.

Information We May Collect From You

We may collect and process information that you provide directly, by:

- Filling in forms on our website(s) or via mobile apps
- Online job applications
- Brochure requests
- The information you submit about yourself and your property, contacts, calendar information, location data, and photographs that you upload

If you contact us we may keep a record of that correspondence.

Examples of personal data that you may provide to use when using this website or mobile apps, and which we may collect and process are:

- Your name
- Your employer's name
- Your occupation or position
- Contact telephone number(s) and email address
- Postal address
- Your interests
- Your IP addresses
- The method by which you found our website
- Various information stored in third-party cookies
- Employment details, where provided by you, in relation to any job application made by you via this website
- Job alert preferences that you have selected when you have subscribed to alerts via the website
- Mailing list preferences that you have selected when you have subscribed to any mailing lists via the website

Centum will also collect information about your device, including where available and subject to your cookie and privacy settings, your IP address, operating system type, and browser type. We may share non-personal aggregated statistics about our website visitor traffic patterns with authorised partners, for instance, Google Analytics. We will not however collect, sell or share any information about individual users.

How We Will Use Your Information

We will use the information held about you for the purposes for which it was provided to us as stated at the point of collection (or as may be obvious in the context of collection). Your personal data will be used by us in the following ways:

- To carry out our obligations arising from

any agreement that we have with, or concerning you and to provide you with the information, benefits and services that you request from us

- To respond to your enquiries
- To send you any information that you have requested
- To improve our business and the service and/or products we provide
- To facilitate any interest in a career with Centum
- To comply with our legal obligations
- To comply with demands or requests made by relevant regulators, government bodies or law enforcement authorities in connection with any disputes or litigation
- For market research purposes
- For assisting you get on our approved supply chain

We do not collect or compile personal data for release or sale to outside parties for consumer marketing purposes or host mailings on behalf of third parties.

We must have a legal reason to process your personal information. Your information will usually be processed to meet our legitimate interest to facilitate your interest in our business. In those few cases where your consent is required, this will be communicated to you at the point of collection.

Unless otherwise agreed with you, we will not use your personal data for automated decisionmaking or profiling.

How We Store Your Personal Data

All personal data provided to us via the use of this website is stored on systems with appropriate technical and organisational security measures and controls. These measures are reviewed regularly to make sure they remain appropriate.

The transmission of information via the

internet is not completely secure. Although we will use our best endeavours to protect your personal data, we cannot guarantee the security of any third-party infrastructure or application you may use to transmit your data (for example, internet browsers, public wi-fi access). We may transfer and process your data outside of the UK. Where your personal information is to be transferred outside the UK we will take reasonable steps to ensure that there are appropriate

safeguards to protect your information. We will keep your personal information for at least as long as we have a relationship with you. When deciding how long to keep your personal information after our relationship with you has ended, we will consider our legal, regulatory and professional obligations.

The accuracy of the information that we hold about you is important to us. If any of the personal information we hold about you becomes inaccurate or out of date, or you object or wish to restrict us processing it, please inform us as soon as possible using the contact details above so that we may update our records.

Disclosure of Your Information

We may share your personal data with any member of our group who requires access to that information to assist you with your enquiry, and where relevant, our professional advisers.

Where required by law or regulatory agreement, or where necessary to fulfil our contract with you, we may also disclose your personal data to:

- Other companies that are engaged by us to provide services to us, in which case we will require those parties to keep that information confidential and secure and to use it solely for the purpose of providing the specified services to us;
- Our professional advisers, auditors, and insurance companies;

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Company Registration No | NI635459

- Regulators, government agencies, law enforcement authorities;
- Any relevant ombudsman, dispute resolution body, or court;
- Persons or entities connected with any sale, merger, acquisition, disposal or similar change in the organisation of our business

Legal Basis for Processing

For personal data which is not 'sensitive personal data' or 'special categories of personal data' under the relevant data protection laws, unless otherwise notified, we rely on a condition known as 'legitimate interests' in order to process your personal data for the purposes specified above.

We will ensure that the collection and processing of your personal data is kept to a minimum with regards to the amount of data collected and the extent of any processing and will be proportionate to meet our legitimate interests.

If applicable, we will only process 'sensitive personal data' or 'special categories of personal data' where you have provided your explicit consent to do so via a separate consent form referencing this privacy notice, or where there is an alternative legal basis for processing under the relevant data protection laws.

Links to Other Sites

Our website, email communications and IT systems may contain links to other websites or services of partners and clients, or of other third parties. The content and privacy policies of any external site are outside of our control, and we do not accept any responsibility or liability for content or policies. It is your responsibility to check the policies of a third-party site before you submit any personal data to them.

Your Rights

You have rights regarding the use of your personal information, including the right to access, correct, delete, restrict or object to our use of it.

If the information we hold about you is no longer accurate, please inform us as soon as

possible. We may ask for additional information from you to deal with any request.

If you have any cause for complaint relating to the way that your personal data is held or processed by us, or if you are dissatisfied with our handling of any request by you in relation to our rights, we would request in the first instance that you make a complaint using the contact details published above.

You have the right to make a complaint relating to data protection to the Information Commissioner's Office (ICO).

Changes to our Privacy Policy

This privacy policy was last amended on 28th August 2018. We keep our privacy policy under regular review, and we reserve the right to change it at any time. Please check back frequently to see any updates or changes to our privacy policy.

We may email to notify you of any changes where we need to process your personal data for reasons you may not expect based on the content of this privacy notice.