

BAM UK & Ireland

Privacy Policy Statement

BAM UK & Ireland is an operating division of Royal BAM Group n.v. and consists of three business segments: BAM Construction, BAM Infrastructure and BAM Ireland.

This policy is applicable to all BAM UK & Ireland activities.

BAM UK & Ireland is committed to protect personal data and respect privacy in compliance with the UK GDPR and the Data Protection Act 2018. Our privacy key principles are:

- The processing of personal data is in compliance with BAM's Privacy Policy and applicable privacy legislation.
- The personal data is adequate, relevant and the access to and processing of personal data is limited to only what is necessary for specific, determined, legitimate business purposes.
- The personal data is kept accurate and up to date, is only kept as long as is necessary for the intended purposes and is then securely destroyed.
- All personal data is treated and protected according to its level of confidentiality.
- Employees and any other representatives of BAM Group have a duty to report any (suspected) personal data breaches.
- The reasons for collecting and processing personal data are determined and are clearly communicated to the relevant individuals as is the information necessary to ensure a fair and transparent processing.
- A Data Processing Agreement (DPA) must be in place before any personal data is processed on behalf of BAM Group by a third party.
- The rights of individuals to access, correct, object against the processing of, restrict and remove their personal data will be respected.
- Privacy and Security by Design need to be applied before implementing new business processes or services such as new IT systems.

This policy is achieved by effective operation of our integrated management systems together with the active leadership, participation, professionalism and commitment of all personnel. The management systems aim to meet the requirements of the division, our clients and other interested parties.

The Divisional Leadership Team regards the responsibility of management in implementing this policy statement to be fundamental to BAM UK & Ireland Division meeting its standards and commitments.

Executive Directors are responsible for ensuring the implementation of this policy within their area of control.

Our approach provides the framework to set and monitor objectives with key focus on:

People

- BAM will require employees (directly or indirectly) and/or other persons it commissions to process personal data on its behalf (either directly or indirectly), have received training in line with GDPR requirement.
- BAM will ensure the rights and freedoms of people and ensure that those rights and freedoms are appropriately taken into account in the decisions it takes. BAM will ensure that it has sufficient controls in place to assist people who wish to
- exercise their data privacy rights.

Information, access and rectification

- BAM will provide information to all subjects prior to the processing of their data.

Security and confidentiality

- BAM will ensure appropriate technical and organisational measures to protect personal data from misuse or accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, acquisition, access or other processing.

Third party management

- Ensuring appropriate third party due diligence and monitoring the compliance of data protection and privacy responsibilities.

Incidents and complaints

- A structured approach to the management of incidents and complaints.

The COO for UK & Ireland has appointed a Compliance Officer and Data Protection Managers to ensure awareness of this policy is promoted throughout the Division, the effectiveness is monitored and areas for continual improvement identified and implemented.

This policy statement has been approved electronically. Proof of approval can be seen upon request.

John Wilkinson
Chief Operating Officer
BAM UK and Ireland

