

## Royal BAM Group

### Privacy Policy Statement

The Executive Committee of Royal BAM Group is committed to protect data and respect privacy.

This policy is applicable to all Royal BAM Group activities and all its companies, employees and any other representatives (hereafter 'BAM').

BAM's key privacy principles are:

- The processing of personal data is in compliance with BAM's policy on privacy and applicable privacy legislation.
- 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.
- 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 have a duty to report any (suspected) personal data breaches.
- 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 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.

BAM's approach provides the framework to set and monitor objectives with key focus on:

#### Management system

- Deliver a clear framework for managing the risks related to processing personal data of employees and third parties, for ensuring appropriate controls and for monitoring effectiveness.

#### People and communication

- Ensure awareness, knowledge and skills to handle personal data on behalf of BAM while protecting data and respecting privacy.

#### Information, access and rectification

- Provide information via privacy statements to all subjects prior to the processing of their data, including how to use their privacy rights.

#### Security and confidentiality

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

#### Third party management

- Endorse 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.

This policy is achieved by effective operation of the integrated management systems together with the active leadership, participation, professionalism and commitment of all internal stakeholders involved. The management systems aim to meet the requirements of BAM, its clients and other external stakeholders.

The Executive Committee regards the responsibility of management in implementing this policy statement to be fundamental to BAM meeting its standards and commitments.

BAM has appointed a Director Governance and Compliance for the Group to ensure awareness of this policy is promoted throughout the company, the effectiveness is monitored and areas for continual improvement identified and implemented.

#### Ruud Joosten

#### Chief Executive Officer

For and on behalf of the Executive Committee of Royal BAM Group



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