



Mammoet Privacy Statement – Customer, Supplier and Business Partner Data

Updated August 2024

1. INTRODUCTION

This is the Mammoet Privacy Statement for customer, supplier and business partner data. This Privacy Statement provides information on the processing of personal data by Mammoet Holding B.V., Van Deventerlaan 30-40, 3528 AE Utrecht and its group companies, hereafter: Mammoet, we or us.

The primary purpose of this Privacy Statement is to be a dynamic resource and business tool so that we can offer our services to you in the best possible way. We want you to feel secure when visiting our site and webshop and are committed to maintaining your privacy when doing so.

This Privacy Statement may be changed over time. Please check our website for the most up to date version of this Privacy Statement.

2. PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA

2.1 Business communication

We collect your information when you contact us for example, via one of our online contact forms, when you send us questions, suggestions, compliments or complaints, or when you request a quote for our Services.

For this purpose

- we process – to the extent applicable – your name, (business) contact details, and any other information that you provide to us.

We engage in these activities with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest.

2.2 When you use our websites or apps

Depending on the country you live in, we provide a webshop, online portals and apps that have several functionalities. For example, through our websites and apps you can find information about our products, services and applicable terms, view your orders, change your name, contact details and other personal information and contact us.

When you use our websites or apps, we process technical data about your device to offer you functionalities and to allow us to manage and improve the performance of our websites and apps. If you enter data on our websites or apps, such as a product preference or your location to receive relevant information or functionalities, we process this data to provide you with the requested information or functionalities. Further, we process your personal data to allow you to create a user account (which you can access with your username and password created by you), to allow you to save your data to your saved items (such as preferences and products) and to allow you to purchase the items from the webshop.

For this purpose

- we process the personal data you have entered into our websites and apps, such as your name, e-mail address, title, telephone number, address or any other information you have added to your account, log-in data or the personal data generated by the functionalities you have used on our websites and apps, and the technical data from your device such as its IP address, the internet browser you use, the pages you have visited on our websites, your click- and surf behavior and the length of your session.

We engage in these activities with your consent (e.g. when using marketing and social media cookies on our websites and apps) and/or because we have a legitimate interest (e.g. to execute the purchase agreement when you purchase something from the webshop or for offering technically adequately working websites and apps and to improve their performance).

2.3 Social media connections

Our websites may contain various social media sharing functionalities, such as Facebook, Instagram, WhatsApp, Twitter, YouTube or LinkedIn buttons, which, with your consent, you may use to share information provided on our websites with the social media selected by you. Our websites may also contain links to our own social media pages, such as our Mammoet Facebook, YouTube or LinkedIn pages or our Twitter feed, which you may choose to use to post feedback.

Likewise, various social media websites, such as Instagram, Facebook, Twitter or LinkedIn, may contain Mammoet advertisements containing links to our websites. This is based on your searches or topics you have shown an interest in or when you have participated in our events. These social media websites may, with your consent, share information provided by you with us when you choose to follow a link to one of our websites.

Processing personal information is subject to privacy policies and practices of these other organizations. Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Twitter, Google, Microsoft, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any personal information you disclose to other organizations through or in connection with our social media functionalities and/or advertisements.

For this purpose

- we process your name, email address, IP-address, photo, list of social media contacts and any other information that may be accessible by us when using social media functionalities, such as liking the Mammoet social media page.



We engage in these activities with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest.

2.4 Assessment and acceptance of a Business Partner

We will process your personal data for our assessment and acceptance processes, for example confirming and verifying your identity, due diligence, possible preliminary credit checks and screening against publicly available government and/or law enforcement agency sanctions lists and/or bad press.

For this purpose

- we process your contact details such as your (business) address and email address, personal details such as your name and date of birth, payment and credit information and details of your correspondence with us.

We engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

2.5 For the conclusion and execution of an agreement

When you have purchased a product or service from us as a customer, or when you work together with us as a supplier or business partner, we process your personal data for the digital signing of contracts and documents or for administrative purposes such as sending invoices and making payments. We also use your personal data to deliver or receive and administer our or your products or services, including related customer services.

For this purpose

- we process your contact details such as your (business) address and email address, personal details such as your name and date of birth, payment and credit information, bank account number, IP address (in case of digital signing), details of your correspondence with us and other information which is relevant for the contract and account.

We engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

2.6 Relationship management and marketing

We use your information, including your possible preferences you have shared with us, to send you offers, newsletters, other relationship management or marketing communications, including promotions or invitations to events, administering events or promotions, providing customer services and perform account management. We also use your personal data for developing, performing and analyzing marketing strategies.

For this purpose

- we process your contact details such as your (business) address and email address, personal details such as your name, IP Address, contact preferences, payment information, order history and topics you may be interested in (as may be indicated by you on our website). For the newsletter we store your personal information and e-mail address. This data is registered to send you targeted information and offers from us. Your data will only be used for this purpose. We will keep your e-mail address as long as you are subscribed to (one of) the newsletters and/or for as long as you have a registered account.
- In addition, we process personal data by using cookies (see paragraph 3 below) on our websites and apps, based on your consent.

Opt-out: If you would no longer like to receive surveys, newsletters, magazines, catalogue or marketing communication from us, please use the opt out options in our communication.

We engage in these activities with your consent, to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

2.7 Development and improvement of products and services

We process your personal data for assessing, analyzing and improving products and (customer) services. We do this by using and combining customer data to analyze customer behavior and to adjust our products and services accordingly. In addition we do this by compiling analytics reports on the use of company websites or apps, assessing (online) campaigns and adjusting products and services accordingly, to ensure that it is relevant to customers, including analyzing how often customers read newsletters, how often customers visit company websites or apps, which pages customers click on, what goods or services customers purchase through company websites or apps.

For this purpose

- we process your contact details such as your address and email address, personal details such as your name, payments and credit information and your correspondence with us. In addition, we process the personal data you entered into our website or app or that were generated by the functionalities you used on our website or app and the technical data from your device such as its IP-address, the pages you visited on our website, your click- and surf behaviour and the length of your session.
- If you choose to participate in our surveys, we may ask you to provide us with personal data. We may also use the personal data that you have provided in the survey for this purpose.

We engage in these activities with your consent and/or because we have a legitimate interest.

2.8 Management reporting for our business purposes including analysis and development

We process personal information for reporting on general management, order/contract/project management and asset management to support various business-related purposes, such as leveraging central processing facilities in order to work more efficiently, conducting reviews, audits and investigations, implementing business controls, conducting business partner surveys, managing and using business partner directories, finance, accounting, archiving, insurance, legal and business consulting, dispute resolution, data analysis, developing new products, enhancing, improving or modifying our services, operating and expanding our business activities, such as in the context of mergers, acquisitions and divestitures and in order to manage such transactions.

For this purpose

- we process your contact details such as your address and email address, personal details such as payment and credit information, payment and order history, your name, place of residence, zip code and any other information mentioned in this Privacy Statement or otherwise provided to us by you, if such is compatible with the purposes mentioned in the previous paragraph. We apply aggregation or anonymization to personal data to prepare and perform management reporting and analysis.

We engage in these activities because we have a legitimate interest.

2.9 Investigation compliance and quality improvement

Subject to applicable laws, we may conduct short term carefully controlled monitoring of your activities, such as in emails, text messages or other communications we have with you. We may do this for instance where we have reason to believe that fraud or other crime is being committed, where offences are suspected and where the monitoring is proportionate to the type of the disciplinary offence, or where we suspect non-compliance with anti-money laundering regulations or anti-terrorism screening obligations to which we are subject to.

We may perform investigations in the interest of protecting the security of our communication systems and procedures or for quality improvement and staff training purposes.

For this purpose

- we process your name, your contact information, your correspondence with us, your use of any of our products and services and any other information mentioned in this Privacy Statement or otherwise provided to us by you.
- to comply with our legal obligations, we (or public and government authorities) may need to process your data, including data relating to criminal behaviour, criminal records or proceedings regarding criminal or unlawful behavior, with respect to criminal offences that have been or, given the relevant circumstances are suspected to be or have been, committed.

We engage in these activities to comply with a legal obligation, as appropriate or necessary under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g. counterparty due diligence, anti-money laundering, compliance with competition and tax laws, anti-terrorism screening, financing of terrorism or in relation to the (detection) of fraud or other crimes) or to comply with legal processes. In specific situations we may be required to respond to requests from public and government authorities, including those outside your country of residence. Only if we are required to do so by law or sectorial recommendation to which Mammoet is subject, the relevant personal information will be provided to supervisory agencies, fiscal authorities or investigative agencies.

We engage in these activities because we have a legitimate interest, such as to enforce our terms and conditions and other applicable policies, to protect our operations, to protect our rights, privacy, safety or property, and/or that of yours or others, for quality improvement or to allow us to pursue available remedies or limit the damages that we may sustain.



2.10 Protecting health, safety, security and ensuring integrity

We process your personal data to safeguard our employees, customers, suppliers and business partners and our assets, via access controls to Mammoet's (IT) systems and premises, safety policies and training.

For this purpose:

- we process your name and your contact information.
- when you visit our premises, we process additional information [as set out in the next paragraph 2.11].

We engage in these activities to comply with a legal obligation and/or because we have a legitimate interest.

2.11 When you visit our premises

We process your personal information when you visit us on our premises to ensure appropriate access controls and security.

For this purpose

- we process your name, your contact information and the person you are visiting and your visiting history to our premises.
- when visiting our premises we may also process your car registration number or CCTV footage about you. Our processing hereof is limited to the aim of protecting the safety and security of our employees and of our assets.
- if you have to show a form of ID, the ID is used for verification purposes only. We don't record this information.

We engage in these activities to comply with a legal obligation for locations subject to the International Ship and Port Facility Security (ISPS) Code and/or we have a legitimate interest (safety and security of other persons and our assets).

3. COOKIES

Any processing of your personal data via cookies and/or similar technologies will take place in accordance with our Cookie Statement on our websites.

4. HOW LONG WE RETAIN YOUR PERSONAL DATA

We will retain your personal information for as long as necessary or permitted considering the purposes outlined in this Privacy Statement and consistent with applicable law.

The criteria used to determine our retention periods include:

- the length of time we have an ongoing relationship with you (for example when we provide products and services to you);
- whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period before we can delete them); or
- whether retention is advisable based on our legal position (such as in applicable statute of limitations, litigation or regulatory investigations).

After the applicable retention period has ended, Mammoet will apply the procedures we have in place for secure data deletion/destruction, de-identification, anonymization or archiving.

5. INTERNATIONAL DATA TRANSFERS AND ACCESS TO YOUR PERSONAL DATA

Your personal information may be stored and processed in the countries where we are doing business or in which we engage service providers.

Where our processing of your personal information is subject to the EU's General Data Protection Regulation ("GDPR") and we transfer your personal information outside the European Economic Area ("EEA") to one of our affiliates, we do so in compliance with our Binding Corporate Rules, the [SHV Privacy Code for Customer, Supplier and Business Partner Data](#) (the "SHV Privacy Code").

Where our processing of your personal information is subject to the GDPR or the UK GDPR and we transfer your personal information outside the EEA or the UK **to third parties**, we rely on the following safeguards:

- Adequacy Decisions: The UK Secretary of State and the European Commission have recognized certain countries as providing an adequate level of data protection, so that personal information can be transferred to those countries without additional safeguards. For transfers from the EEA, the full list of these countries is available [here](#). For transfers from the UK, the full list of these countries is available [here](#).
- Standard Contractual Clauses: For transfers of personal information from the UK and/or EEA to countries outside the UK and EEA, which are not covered by an Adequacy Decision, we have put in place standard contractual clauses to protect your personal information. You may obtain a copy of these measures by contacting us via the contact details provided in this Privacy Statement or by following this [link](#).

Access to your personal data within Mammoet

Only certain employees are authorised to access personal data and only to the extent necessary to serve the applicable purpose and to perform their jobs.

Access to your personal data by third parties

Third parties may have access to your personal data where relevant for the provisioning of their products or services to us and to the extent that such processing is necessary for the purpose of processing agreed with us.

Examples of third parties:

- Banks, insurance companies, accountants and advisors in finance, tax or legal.
- Service Providers that support us in:
 - 1) concluding and executing agreements with our business partners;
 - 2) relationship management and marketing;
 - 3) running our IT processes, for example to help us maintain our IT network and related infrastructure and security, including forensic specialists;
 - 4) performing any other purpose mentioned in this privacy statement.
- In other cases, your personal data will not be supplied to third parties, except when required by law. In specific situations we may be required to respond to requests from public and government authorities including those outside your country of residence. Only if we are required to do so by law or sectorial recommendation to which Mammoet is subject to, the relevant personal information will be provided to supervisory agencies, fiscal authorities or investigative agencies.



6. SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect personal information within our organization.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the contact details provided in this Privacy Statement.

7. YOUR RIGHTS

If you would like to request to access, correct, update, suppress, restrict, or delete personal information, object to or opt out of the processing of personal information, withdraw your consent (which will not affect the lawfulness of processing prior to the withdrawal), if you would like to request to receive a copy of your personal information for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), you may contact us with your request to exercise your rights.

In your request, please make as clear as possible what personal information your request relates to. We may request you to provide verification of your identity before responding to your request. If you added information to your user account yourself, then you can also access your user account to access, correct or remove it yourself.

We will respond to your request consistent with applicable law. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that began prior to your request for correction, updating or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed. If we do not grant your request, we will explain to you why.

Individuals from the European Economic Area or the United Kingdom may lodge a complaint with (1) an EU/EEA data protection authority for their country or region where they have their habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. A list of EEA data protection authorities is available [here](#); or (2) the [UK's Information Commissioner](#).

If our processing of your personal information is subject to the SHV Privacy Code, additional information about your rights, including your third-party beneficiary rights, and how you may exercise them are available in the SHV Privacy Code .



8. CONTACTING US

You can request access, correction, restriction, portability or removal of the data that Mammoet processes about you at any time by sending a request to: privacy@mammoet.com.

If you feel we do not comply with applicable privacy rules you have the right to lodge a complaint with a competent data protection authority.

Should you have any questions regarding the processing of your personal data, please contact privacy@mammoet.com.