

Privacy policy of AS TREV-2 Grupp

(valid from 1 March 2021)

The privacy policy has been drawn up to comply with the requirements established for data processors in Article 12 of Regulation 2016/679 of the European Parliament and of the Council (hereinafter "GDPR") "Transparent information, communication and modalities for the exercise of the rights of the data subject" and for notifying natural persons of personal data processing principles.

1. What is personal data and when do we process it?

- 1.1. Personal data is any information about an identified or identifiable natural person (data subject). A natural person can be identified, in particular, by reference to an identifier (name, identification number, place of residence, location, e-mail address, phone number, online identifier) or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.2. Special categories of personal data are personal data containing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data used for the unique identification of a natural person, health data or data on a natural person's sexual life and sexual orientation.
- 1.3. We process your personal data if:
 - you are entering into or have entered into an agreement with us or the agreement contains your personal information;
 - you contact us with a letter containing your personal data;
 - you contact us by phone;
 - you visit our website;
 - you are applying for a job or internship with us;
 - you participate in polls and surveys;
 - you visit our office or any other territory (video surveillance);
 - personal data are processed on any other legal grounds.

2. What is the purpose of personal data processing and what data can we process?

- 2.1. We process your personal data for the following purposes:
 - establishing and managing customer relationships and communicating with customers;
 - concluding agreements and performing the agreements concluded;
 - responding to phone calls and letters, proceeding legal claims;
 - conducting customer satisfaction surveys;
 - protecting property and discovering offences;
 - fulfilment of legal obligations (e.g. accounting obligations);
 - based on other legitimate interests of AS TREV-2 Grupp (hereinafter: **TREV-2**), provided that these override the data subject's rights.
- 2.2. We process the following personal data about you:
 - first name and surname;
 - personal identification code or date of birth;
 - data on personal identification document;
 - contact information (address, e-mail address, phone number);
 - other information concerning an agreement (bank account number, car license plate number);
 - photo, video image;
 - case-based data presented in letters and other documents.

3. Applying for a job or internship with us

- 3.1. If you apply for a job or internship with us, we process your first name and surname, e-mail address, phone number and personal data contained in your CV and cover letter. We process the candidate's personal data in order to assess the candidate's suitability for the job or internship position. During the selection process, we only process information about candidates that is related to their qualifications, professional skills and attributes.
- 3.2. When you apply for a job, you have the right to know what data we have collected about you, review the data we have collected, provide explanations for the data and raise objections. The candidate has the rights of the data subject as specified in this privacy policy and provided for by applicable law.
- 3.3. A candidate's personal data can only be accessed by employees involved in the specific recruitment process and any third parties who assist us in the recruitment process (recruitment companies).
- 3.4. We use the personal data of the selected candidates to conclude an employment contract with them. The personal data processing principles of the employees are set out in the personal data processing policy of TREV-2.
- 3.5. We retain the personal data of the candidates for a position for up to 1 year. Then, we will delete the personal data of the unsuccessful candidates, unless we have obtained the candidates' consent to further processing of their personal data so that we can offer them other positions if appropriate.

4. Photos of events

- 4.1. We organise and participate in events where photos are taken at our request. The photos taken at such events at our request are the property of TREV-2 and we may process them at our discretion (for example, publish on the company's intranet, website, social media channels or public media).
- 4.2. If you participate in the events we organise or in which we participate, please bear in mind that your personal data (photo) may remain on the recordings described above. If you do not wish to remain on any recordings, please notify the recorders in advance.

5. Video recordings

- 5.1. We have video surveillance in our premises and other territories to protect property and discover offences. Where cameras are used, the areas within the field of view of the cameras are always marked correspondingly. The controller of the video recordings from video surveillance and the personal data processed in the video recordings is TREV-2.
- 5.2. From time to time, we may record construction processes on a construction site for the purpose of performing a contract. The short video produced as a result of the recording does not contain any personal data.
- 5.3. All video recordings are only accessible to persons who have the right to access the video recordings based on their work duties.
- 5.4. As a rule, video recordings are stored for up to 60 calendar days, unless the need for longer storage arises due to ongoing proceedings or has been prescribed by law.

6. Visiting the website

- 6.1. Our website uses cookies. A cookie is a small text file that the web browser automatically saves on a user's device. When visiting the website, the data collected and stored about the visitor are limited to the following:
 - internet address (IP address) of the computer or computer network used;
 - name and address of internet service provider for the computer or computer network used;
 - time of visit (time, date, year);
 - information on which part of the website is used and length of the visit.
- 6.2. IP addresses are not linked to any information allowing identification of a person. The collected data are used to compile visitor statistics in order to develop the website and make it more convenient for the visitor. The data are retained for 1 year.

- 6.3. The user of the website can block and delete the cookies stored on their devices. To do this, the browser's privacy settings must be changed. However, blocking all cookies may restrict the use of the website.

7. Personal data processing principles and term

- 7.1. We process your personal data under the GDPR and in accordance with the following principles:
- personal data processing is lawful, fair and transparent. We collect and process personal data purposefully and to the minimum extent needed. The personal data are correct, and rectified where needed;
 - we do not issue personal data to other persons, except where there is a legal basis to do so;
 - we only retain the personal data for the required period, and will then delete the data;
 - we protect the personal data entrusted to us from unauthorised processing. In processing personal data, we use security measures that protect personal data from illegal access and accidental loss and destruction.
- 7.2. We will process your personal data for as long as is necessary to execute the legal relationship between TREV-2 and you or until you withdraw your consent to the processing of personal data, or for tax and legal purposes until the statutory deadlines.

8. Your rights as a data subject

- 8.1. We have a legal obligation to ensure that your personal information is accurate and up to date. Please be sure to inform us of any changes that need to be made to the personal data we process about you, so that you could assist us in fulfilling the above obligation.
- 8.2. You have the following rights with respect to all personal information we collect about you.

Right to access your personal data

You have the right to request a confirmation about whether any personal data concerning you are being processed and, if so, the right to request their issue to you. To access your personal data, you need to file a request with us. When issuing personal data, we must be sure of your identity. Therefore, you need to sign the request by hand or digitally. We will refuse to comply with a request if complying with it could harm another person's rights. We will notify you of the refusal as soon as possible, but no later than in one month after receiving the request.

Right to receive information about the processing of your personal data

If we have collected any data about you, you have the right to know the purpose for which it was collected, to whom your personal data has been or will be disclosed, how long the data will be retained and, if the data has not been collected from you, the source of the data.

Right to rectification

If you discover that the information concerning you is incorrect and does not correspond to reality, you have the right to request that the incorrect personal information be rectified or supplemented. To do this, file a handwritten or digitally signed request with us and add any evidence supporting your request, and a description of the circumstances. We will provide information on the rectification, erasure or restriction of the processing of the personal data to all persons we have disclosed the personal data to, unless this proves impossible or requires a disproportionate effort.

Right to object

You have the right to object to the processing of your personal data. To do this, file a reasoned request with us, signed by hand or digitally.

Right to data portability

If your personal data are processed automatically based on your consent or a mutual contractual relationship, you may request your personal data from us in a structured, publicly available format and in a machine-readable form. You can also request the transfer of your personal data to another

controller. Please note that the data can only be transferred to another controller if it is technically feasible.

Right to withdraw consent

If your personal data is processed based on your consent, you have the right to withdraw your consent at any time.

Right to restriction or termination of personal data processing

If there is no legal basis for processing your personal data, you can request that the use of the data be restricted, terminated or that the data be deleted. To do this, file a reasoned request with us, signed by hand or digitally. We will delete the personal data if:

- the natural person withdraws the consent given to the processing of the data;
- the personal data are no longer needed for the purpose for which they were collected;
- there is no legal ground for the processing of the personal data;
- the personal data have been processed unlawfully;
- a legal obligation must be complied with.

If personal data are processed on a legal basis that does not allow for the deletion of the data, the data will not be deleted.

9. Personal data transfer, and place of processing

- 9.1.** In addition to what is agreed in our agreement, we may transfer your personal data to third parties to process, who assist us with data security. Such parties include, for example, providers of databases and software, providers of database management services or cloud data services.
- 9.2.** When using authorised processors, we only use authorised processors who ensure an adequate level of data protection in accordance with the legislation in force in the European Union.
- 9.3.** We store and process your personal data mainly in the European Union ("EU") and the European Economic Area ("EEA"). However, from time to time it may be necessary to transfer and store your personal data outside the EU or the EEA. Data may also be processed by authorised processors outside the EU or the EEA.
- 9.4.** By submitting your personal data to us, you consent to the processing of your data and confirm that you are aware that the processing of your personal data, including the storage and transfer of the data, is necessary for the fulfilment of the agreement to be signed between us, or for any other purpose given in this privacy policy.

10. Data protection and security measures

- 10.1.** We process your personal data in accordance with the GDPR, the Personal Data Protection Act and other legislation of the Republic of Estonia.
- 10.2.** We have implemented appropriate technical and organisational measures to ensure that personal data are processed in a way that prevents the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to the data stored or transmitted.

11. Personal data breaches

- 11.1.** We document all personal data breaches, including the circumstances, impact and actions taken. We will notify the Data Protection Inspectorate of the breach without undue delay and, if possible, within 72 hours of becoming aware of the breach, unless the breach is not likely to endanger the rights and freedoms of natural persons.
- 11.2.** In the event of a serious threat to the data subject's rights and freedoms, we will inform the data subject. The Data Protection Inspectorate may decide that informing the data subject is not necessary.

12. Changes to the privacy policy

- 12.1.** We have the right to make changes to the privacy policy. If we change our privacy policy in any way, we will publish the newest version on our website. We recommend you periodically check for changes to this privacy policy.

13. Complaints and contact information

- 13.1.** According to Article 15 of the GDPR, you have the right to request that we notify you of the details concerning the processing of your personal data. Also, if you have any questions, inquiries, requests or complaints regarding the processing of your personal data, please feel free to contact us.

Address: Teemeistri tn 2, Tallinn 10916

Phone: +372 677 6500

E-mail: andmekaitse@trev2.ee.

- 13.2.** If you find that your right to privacy has been violated, you can lodge a complaint with the Data Protection Inspectorate (Tatari 39, Tallinn 10134; e-mail address info@aki.ee).