

PRIVACY POLICY

0. Introduction

This privacy policy is applicable on

- 🌿 **PRIMORIS Belgium CVBA**, established in 9052 Zwijnaarde, Technologiepark 90, Belgium, with enterprise number 0559 872 221 (hereafter to be called: "Primoris", "we", "us")
- 🌿 **PRIMORIS Bulgaria AD**, with registered office in 4004 Plovdiv, Plovdiv County; Plovdiv Municipality, South District 134 Buxton Brothers St., Bulgaria;
- 🌿 **PRIMORIS France S.A.R.L.**, with registered office in 45270 Bellegarde, Avenue du 21 août 1944 n° 32, France;
- 🌿 **PRIMORIS Colombia S.A.S.**, with registered office in Cota, PI Ciem Oikos Occidente oficina 301, Calle 80 Autopista Medellín, km 2.5 Vía Parcelas, Colombia
- 🌿 **PRIMORIS Costa Rica S.A.**, with registered office in Alajuela, Zona Franca FlexiPark, Bodega A7, Costa Rica
- 🌿 **PRIMORIS Ecuador S.A.S.**, which has its registered office at Av. 12 de Octubre N26-97 y Lincoln, Quito, Ecuador
- 🌿 **PRIMORIS Serbia**, which has its registered office at Beogradskog bataljona No. 4, 11000 Belgrade, Municipality of Čukarica

Your privacy is important for us and we give great importance to a correct processing of the personal data of clients, prospects, suppliers, visitors, collaborators...

The confidentiality, adequacy and careful treatment, processing, management and safety management of personal data is of the greatest importance for our organization and are developed according to the General Data Protection Regulations (GDPR). You can always contact us in relation with this per e-mail at gdpr.be@primoris-lab.com.

- 🌿 This declaration of privacy can be modified at any time as a consequence of legal modifications or modifications of the functionality for which this policy is valid.
- 🌿 Modifications are explicitly mentioned on our website www.primoris-lab.com and after any change, the version number of this privacy policy is modified. The version number is to be found in the footer of this document. Therefore, we advise you to regularly check the declaration of privacy of Primoris on the website.

1. When is this declaration of privacy applicable?

This declaration of privacy is in vigour for the processing of personal data which we obtain from institutions, at the time of deliveries and/or via the website of Primoris, through the cookies we use or through commercial contacts with clients, prospects, leads and / or other stake holders of Primoris.

2. Who is responsible for the processing of your personal data?

a. Responsible of processing

Primoris is responsible for the processing of your personal data. This means that Primoris establishes for which purposes your personal data are stored and processed.

b. Processor of your personal data

Any external subcontractor appointed by Primoris to process personal data, is considered as processor and not as processing responsible. They work in agreement with GDPR norms.

3. Which personal data do we process

a. Data provided by yourself

We receive your personal data amongst others when you announce them to us through:

- 🌱 Analysis-request via email
- 🌱 Analysis request through application form at arrival of sample to be analysed
- 🌱 Contact through e-mail based on the Primoris website towards one of the following services:
 - Info
 - Client service
 - Commercial team
 - HR team (in the frame of job applications – CV)
- 🌱 Inscription tool e-mail communication and events via website
- 🌱 Contact with client service or commercial collaborators concerning events

In the above-mentioned cases, we normally receive information such as your first name, family name, e-mail address, landline and/or mobile phone number, address data (street number, post code, municipality, country), the company you work for, gender, products or activities you are interested in, the sector in which you are active, your function, your correspondence with Primoris and/ or other personal data.

b. Automatically gathered data

Web site visit

In general, you visit each website of Primoris anonymously.

When you visit our website, we however receive data from cookie providers concerning your activity on our website, such as the time and duration of your website visit, the hyperlinks you click to visit our website and those on our website that link with other websites, your IP-address, the pages you visit, the browser you use, your geographical data such as your location and your language of preference.

The websites of Primoris use cookies to obtain the above-mentioned anonymous information through Google Analytics-

Links to the website of third parties

Primoris has no control over and does not accept any responsibility concerning your privacy for actions that are undertaken by websites of third parties. For this we refer to the privacy policy of these websites.

E-mail communication via Marketing Automation system

If you receive e-mail communication through Primoris, which is sent by means of a professional marketing automation system, we receive the following information:

- is the e-mail communication opened or not by the addressee?
- if present, has the addressee clicked on one or several hyperlinks in the communication?
- which website pages has the addressee visited on the website?
- for which events has the addressee registered him or herself through the website?

c. Data obtained from third parties

Sometimes we also receive your information from affiliated enterprises or partners. In the framework of promotions or commercial opportunities, we can collect your personal data through these affiliated enterprises or partners.

For HR purposes, we can also receive your personal information, if this matches with the profile we are searching for outstanding vacancies.

4. Quality standards for personal data processing

a. Minimum data processing

Primoris limits itself to the gathering of strictly necessary information that allows us to be able to exercise our commercial activities in relation with the personal data of our clients, providers and collaborators.

b. Correctness of the data

We try to register the personal data correctly and require this correctness from our subcontractors. However, whenever you might find an error in your personal data, you can communicate this through gdpr.be@primoris-lab.com.

5. For which purposes do we process your personal data?

a. To answer your question and to inform you

We process your personal data when you ask for an offer, ask us a question, ask for an analysis or ask us to be informed about our services, activities, events, actions, offers... For this objective, we can keep personal data such as your name, address, e-mail address, phone number, the enterprise you are linked with, your e-mail or contacting history, preferred language, analyses or activities you are interested in, product groups where you are active.

These personal data are processed based on:

Privacy policy PBE | v03 – 19/01/2023



- 🌱 Your explicit agreement wherever necessary
- 🌱 The execution of a contract where you are one of the parties
- 🌱 Your request for the realisation of actions before entering into a contract.

If in the past you have asked for an offer or have had any contact with our collaborators, we will keep you informed about our activities, unless you haven't given your permission to do so. If afterwards you do no longer want to receive this information, you can unsubscribe through the unsubscription button which you find underneath the e-mail or you can request this through gdpr.be@primoris-lab.com.

b. To answer questions and to interchange information

If you ask us a question through e-mail or the phone, we will process your data to be able to answer your request.

For this purpose, we can process the personal data such as your name, the name of your enterprise, your function, your e-mail address, your phone number, your correspondence with Primoris and all the other personal data that are necessary for us to be able to express an answer to your request.

These personal data are processed based on:

- 🌱 Your request to undertake steps before you confirm a service of Primoris.
- 🌱 The execution of a contract where you are an involved party
- 🌱 The justified interest of Primoris to inform you about its activities
- 🌱 Information obtained in previous analysis requests

c. To manage your user's profile on our website

The Primoris website disposes of a protected client zone. To create a user's account and password, we need the e-mail address of a contact person inside your enterprise.

For this objective, we can process data based on the need to execute the agreement with the client and to give the client access to the Extranet which simplifies the request for analyses and the demand for results.

d. To continuously optimise our website and to fine-tune with your preferences

We process personal data to continuously improve our website, to personalise it and to adjust it to the preferences of our clients. User-friendliness is central in our functioning and this is also applicable on the user-friendliness of our website for our clients.

For this purpose, we can process data such as your IP-address, the web pages you visit, the browser you use, your geographical data such as your location, your language of preference and the time and duration of your visit.

These personal data are processed based on the justified interest of Primoris to improve its website(s) and to protect itself against cyber-attacks.

e. To achieve commercial activities

If you ask us a question through e-mail or the phone, we will process your personal data to be able to undertake the correct commercial steps towards you.

For these purposes we can process personal data such as your name, the name of your enterprise, your function, your e-mail address, your phone number, your activities, your interest in the services of Primoris, your correspondence with Primoris and all the other personal data that are necessary for us to be able to express an answer to your request.

These personal data are processed based on:

- 🌱 Your request to undertake steps before you confirm a service of Primoris.
- 🌱 The execution of a contract where you are an involved party
- 🌱 The justified interest of Primoris to inform you about its activities
- 🌱 Information obtained in previous analysis requests

6. What is the legal basis to process your personal data?

When the processing of data, according to the GDPR-legislation, requires **your explicit agreement**, we shall also ask you for this. Here we think of the sending of general newsletters, mailings about topics we consider that might interest you, invitations for study days... When you do not give the explicit authorisation, we will not process your personal data.

Some information must be delivered by us, **as per law**, to the authorities or other competent instances. In the execution of these legal obligations, we will also treat your personal data with the necessary protection.

The information we receive in analysis requirements, orders, contracts... is also processed by us in full respect of the GDPR legislation. Because of the **need** of processing of these personal data **to achieve our commercial activities**, we do not have to ask you for permission in this matter. This information can also be used to achieve our **justified interests of our organisation or of third parties**, wherever necessary.

7. Who has access to your data?

Primoris can share your personal data with enterprises that are affiliated with Primoris. Besides, Primoris solicits third parties to execute some activities such as website hosting. We can share your personal data with some definite third parties:

- 🌱 Companies within the Primoris group
- 🌱 Processors who act on our behalf such as marketing & communication enterprises;
- 🌱 Business partners we achieve joint actions with (e.g. HR partners)
- 🌱 Business partners who work as service providers (e.g. External accountants)



- 🌱 IT partners who deliver technical support
- 🌱 Providers of payment services
- 🌱 Lawyers, collection agencies and external consultants: in some cases, Primoris can communicate your personal data to lawyers, collection agencies and external consultants when this is necessary to give us advice or to defend our rights.
- 🌱 Supervising authorities in response to any legitimate request
- 🌱 Possible purchasers of Primoris (or of a part of the enterprise) in case (a part of) the activities are taken over by a third party.

Primoris commits itself to protect your personal data correctly and sufficiently, whenever you have questions about this or you wish more information concerning the transfer of your personal data, contact us through gdpr.be@primoris-lab.com.

Personal data are not delivered to other parties, unless legal obligation or because of a court sentence.

8. What about links towards other websites and social media?

The websites of Primoris may contain references towards other websites. Primoris is not responsible for the processing of personal data through these websites. This privacy policy is only applicable on the websites of Primoris.

If you share content of the Primoris websites through social media, this content is visible for the visitors of these social media. Primoris is not responsible for the processing of personal data through these social media.

8. How long do we keep your personal data?

Primoris will keep your personal data as long as necessary, to guarantee the objectives that are incorporated in this privacy policy, unless a longer storage period is required or allowed by law.

When no legal storage period is in vigour, Primoris will keep your data at least as long as you are an active client, prospect, lead or supplier.

9. How are your personal data protected?

Primoris strives towards the protection of your personal data through technological and structural measures, such as firewalls and secured servers where only few people have access to, through specific rights and with respect for the sensitiveness of the personal data.

Besides these measures, special attention is given to the storage and processing of your personal data (such as logins), certainly in external connection.

10. What are your rights and how can you exercise them?

In relation with your personal data you are entitled:

Privacy policy PBE | v03 – 19/01/2023



- 🌱 To inspection, modification or erasing
- 🌱 To limitation of the processing
- 🌱 To enter objections
- 🌱 Not to approve the profiling
- 🌱 To data transferability
- 🌱 To withdrawing the approval
- 🌱 To enter a complaint with the supervising authority

Some of the above-mentioned rights have a specific objective or are submitted to special conditions or exceptions. Contact us in case of questions or specific requests concerning the processing of your personal data (gdpr.be@primoris-lab.com).

If the processing of your personal data is based on authorisation, you also always have the right to withdraw your approval, without this compromising the legitimacy of the personal data processing before the withdrawal.

You can contact Primoris through gdpr.be@primoris-lab.com or by post at the following address or by clicking the button "Unsubscribe" in our e-mailings.

Watch out: Primoris cannot meet your request without a valid proof of your identity (electronic, written or exceptionally orally).

The concerned person is entitled to request, free of charge, which personal data about him are being processed. This information must be given in a concise, transparent and understandable way. Primoris commits itself to deliver the information as soon as possible and at least within a month. In case of complex requests, prolongation is possible, but you will be informed about this within the month. In case of unjustified or disproportionate requests (repeated requests) administrative costs may be charged or the request may be refused.

You are entitled to file a complaint with the controlling authority of your usual domicile, of your fixed working site or of the site of the alleged infringement. The Belgian Privacy Commission is the controlling authority for Belgium and must be contacted through commission@privacycommission.be.

If you have more questions or complaints concerning the processing of your personal data, about the websites or e-mails of Primoris or about this privacy policy, you can always contact us:

- 🌱 E-mail: gdpr.be@primoris-lab.com
- 🌱 Phone: +32(0)9 330 10 10
- 🌱 Post: Primoris Belgium | Technologiemark 90 | 9052 Zwijnaarde (BE)