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# General Privacy Notice

Version November 2019

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## 1. Introduction

In this General Privacy Notice ("**Privacy Notice**") we describe how Fugro uses Personal Data of (prospective) clients, suppliers and (website) visitors. More specifically, we describe how we collect, store, secure and use ("**process**") your Personal Data when you purchase our products or services, supply products or services to us, visit our premises or access our website(s).

When we refer to "**Fugro**", "**we**", or "**us**" in this Privacy Notice, we refer to the Fugro entity(ies) responsible for your Personal Data and acting as "data controller". This (these) will be the entity(ies) with whom you intend to conclude - or have concluded - a contract, whose premises you have visited, whose website(s) you have accessed or with whom you interact in any other way. A full list of the locations and contact details of Fugro entities can be found [here](#).

When we refer to "**Personal Data**" under this Privacy Notice, we mean any information through which we can identify you as an individual (e.g. your name, telephone number, e-mail address etcetera).

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## 2. Scope of this Privacy Notice

This Privacy Notice applies to the processing of Personal Data of (prospective) clients, suppliers and (website) visitors.

- **(Prospective) clients** - When we do business with our clients, the Personal Data we process includes the contact details of (legal) representatives and contact persons of the client. This Personal Data is collected in different ways, for example, by our website, over the telephone, via email or through forms or requests you submit, and during business events and/or meetings.
- **Suppliers** - When we do business with our suppliers, the Personal Data we process includes the contact details of (legal) representatives and contact persons of the supplier. This Personal Data is collected in different ways, for example, over the telephone and via email.
- **Visitors** – When you visit our premises we process your Personal Data as part of our safety and security measures.
- **Website visitors** - When you visit our website(s) we process your Personal Data among others in connection with registrations, purchases, inquiries, and subscriptions for receiving direct marketing. We also collect limited data automatically when you browse our website(s).

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### 3. What Personal Data do we process?

The type of Personal Data we process varies depending on the type of relationship we have with you and the kind of services we provide to you.

**(Prospective) clients and suppliers** - We process the following Personal Data of our (prospective) clients and suppliers to the extent available to us and in accordance with applicable law and regulation:

- **your contact details** - your name, address and any other contact details you provide, such as your telephone number and e-mail address;
- **your communication data** - any requests or complaints you make and any other data that we receive if we communicate with you via email or through our website;
- **your use of our services** - information relating to your use of our Services, such as information related to your purchases;
- **your financial details** - financial information disclosed to us which can be linked to you as a client or supplier, such as bank account details or invoicing details;
- **video surveillance footage** - when you enter our buildings or premises, you are subject to image retention via our video surveillance systems (CCTV). Image retention may also take place during events and fairs where video footage is made;
- **webinar recordings and recordings of other events** - when you attend webinars or other meetings hosted by us, we may make sound and/or video recordings and or photos. We will inform you beforehand if this is the case. You can choose to leave the webinar or meeting in case you have objections to such recording; and
- **any other Personal Data** - this includes any Personal Data that you disclose in the course of your contractual relationship with us.

**Visitors to our premises** - We process the following Personal Data of persons visiting our premises:

- **your contact details** - your name and any other contact details you provide, such as your address, telephone number and email address; and
- **video surveillance footage** - when you enter our buildings or premises, you are subject to image retention via our video surveillance systems (CCTV).

**Website visitors** – We process the following Personal Data when you access our website(s):

- **your contact details** - your name, address and any other contact details which you provide to us, such as your telephone number and email address;
- **your communication data** - any requests or complaints you make and any other data that we receive when communicating with you; and
- **data collected automatically** - when you access our website(s), we collect data automatically through your browser or device by making use of cookies and other technologies including Google Analytics. In this way we track website visitors and collect

information about your use of our website(s). If you want to know more about these automatically collected data, please see our [Cookie Policy](#).

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## 4. For what purposes do we process your Personal Data?

- Processing takes place in order to carry out our obligations arising from contracts entered into with you, and to provide you with the information and services you request. This includes managing and handling your requests, inquiries or complaints, and sending you our invoices or paying your outstanding fees.
- If you are a (prospective) client or website visitor, we process your Personal Data to send you marketing communications (such as newsletters) via email or other electronic means. We will only do so after we have received your consent. You can withdraw your consent at any time (see section 10).
- We process your Personal Data to comply with legal obligations, such as maintaining appropriate business records, complying with lawful requests from governmental agencies and public authorities, and to comply with applicable law and regulation.
- We also process your Personal Data for our legitimate (business) interests, which include the following:
  - to manage our internal client database (CRM) and to maintain contact with you for marketing purposes or other commercial purposes;
  - to operate and expand our business activities, to develop and improve the quality of our Services, to better understand you as a client (client optimisation), and to generate aggregated statistics about the users of our Services;
  - to measure and understand the effectiveness of our marketing;
  - to ensure the integrity of our systems (for example, prevention of hacking, fraud and spamming) and to maintain the security of our buildings and premises;
  - to fulfil management and recordkeeping purposes as well as training and learning purposes; and
  - to facilitate business operations and corporate transactions (e.g. in case of a merger or acquisition).

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## 5. What is our legal basis for processing your Personal Data?

At all times, we process your Personal Data in accordance with applicable data protection laws. This means that we will only use your Personal Data if this is sufficient, relevant and limited to what is necessary. We will only process your Personal Data if we have a legal basis to do so.

The legal bases for processing your Personal Data are the following:

- to perform our **contract(s)** with you;
- to act upon your **consent**;
- to comply with a **legal obligation**; and
- to pursue our **legitimate (business) interests** (or those of third parties) unless your interests and fundamental rights override our interests.

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## 6. With whom do we share your Personal Data?

We share your Personal Data with third parties who assist us in the delivery of our services, or in order to operate and expand our business activities. We will only do so on a strictly need-to-know basis and after entering into the necessary contractual arrangements with such parties.

We share your Personal Data with the following parties:

- **other Fugro group entities** - Your Personal Data may be shared internally with other Fugro group entities for internal administrative, management or business purposes. Your Personal Data will only be used by Fugro group entities for marketing purposes if we have a legal basis to do so. A full list of the locations of the Fugro entities can be found [here](#);
- **service providers** - To assist us in providing our services we engage third party vendors, such as business partners, suppliers (including IT service providers) and analytics and search engine providers supporting us in the improvement and optimisation of our website (e.g. Google Analytics);
- **third parties in case of legal requirement** - We also disclose your Personal Data to third parties where this is required by law (e.g. tax authorities or governmental or judicial agencies) or in the context of an investigation, regulatory requirement, judicial proceeding, court order or legal proceeding; and
- **third parties in case of corporate transactions** - Information about our clients, including Personal Data, may be disclosed as part of a corporate transaction (e.g. a legal merger).

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## 7. How do we share your Personal Data?

We take all necessary steps to ensure that your Personal Data is shared and treated securely and in accordance with this Privacy Notice and applicable legislation. This means that we enter into appropriate legal arrangements with recipients of your data, such as Standard Contractual Clauses ("SCC's") as approved by the European Commission of the European Union or equivalent arrangements with parties outside the European Economic Area. You are entitled to receive a copy of any documentation showing the appropriate safeguards that have been put into place by making a request via [dataprivacy@fugro.com](mailto:dataprivacy@fugro.com).

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## 8. How do we secure your Personal Data?

Fugro takes reasonable steps to ensure that your Personal Data is properly secured using appropriate technical, physical, and organisational measures.

We take steps to limit access to your Personal Data to those individuals who need to have access for one of the purposes listed in this Privacy Notice. Furthermore, we contractually ensure that any third party processing your Personal Data on our behalf maintains at least equal security and integrity standards.

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## 9. How long do we store your Personal Data?

We store your Personal Data on the basis of applicable law and regulation and as long as is required to satisfy the purpose for which the data is processed (for example, for the time necessary for us to provide you with client service, answer queries or resolve technical problems), unless a longer period is required for purposes such as complying with retention obligations for record keeping or commercial requirements. If you would like to receive further information on how long we store your Personal Data, please contact [dataprivacy@fugro.com](mailto:dataprivacy@fugro.com).

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## 10. Which rights do you have with respect to your Personal Data?

You have several rights in relation to the Personal Data processed by Fugro. For example you have the right to request, review, correct, update, restrict or delete Personal Data you have provided to us. If you wish to exercise your rights, you can contact us by sending an email to [dataprivacy@fugro.com](mailto:dataprivacy@fugro.com). We will respond to your request consistent with applicable law.

As part of your request, please indicate which Personal Data you would like to receive, have changed or removed from our database or what limitations you would like to put on our use of the data. We will comply with your request in accordance with applicable law and regulation and as soon as reasonably practicable. Please note that we may need to retain certain Personal Data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion.

In the event your Personal Data is processed on the basis of your consent, you may withdraw consent at any time by sending an email to [dataprivacy@fugro.com](mailto:dataprivacy@fugro.com). Please note that a withdrawal of consent does not affect the lawfulness of any processing which has taken place prior to your consent being withdrawn and that we can only action your request in accordance with applicable law.

If you believe that the processing of your Personal Data infringes this Privacy Notice or applicable law, please contact us at [dataprivacy@fugro.com](mailto:dataprivacy@fugro.com) to raise your concern. If you are a client or supplier, you can also address your concerns to your Fugro contact person or via [Fugro's Speak Up procedure](#). Lastly, if you feel that Fugro has not addressed your concerns properly you have the right to lodge a complaint with the supervisory authority in your country of residence or place of work.

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## 11. Does this Privacy Notice apply when you link through to other websites?

Our websites may, from time to time, contain links to and from third-party websites, Such third-party websites may be managed by business partners or social media networks. If you follow a link to any of these websites, please note that these websites have their own privacy notices and that we do not accept any responsibility or liability for these policies/notices. Please consult the policies/notices posted on such websites before you submit any Personal Data.

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## 12. How do you contact Fugro with privacy related questions?

If you have any questions or concerns about this Privacy Notice or the processing of your Personal Data in general, or if you wish to exercise any of your rights, please email us at [dataprivacy@fugro.com](mailto:dataprivacy@fugro.com) and be sure to indicate the nature of your query.