



DONCASTERS

Third Party Privacy Notice

Scope and Overview

Doncasters is committed to protecting the privacy and security of the personal data of anyone doing business with Doncasters, including employees and contractors of our customers, suppliers, and/or advisors ("you").

This Privacy Notice describes how Doncasters and its related entities (collectively, "Doncasters," "we," or "us") collect and process personal data about you. This privacy notice applies to all people located in the United Kingdom and the European Union.

This Privacy Notice describes what personal data is, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data outside of your home jurisdiction. This Privacy Notice also describes your rights regarding the personal data that we hold about you.

We will only process your personal data in accordance with this Privacy Notice unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

Collection of Personal Data

For the purposes of this Privacy Notice, personal data means any information about an identifiable individual. Personal data excludes anonymous or de-identified data that is not associated with a particular individual.

Examples of personal data include (not a definitive list):

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- photographs
- other personal details included in a biography, CV, or resume such as companies you have worked for, or projects that you have worked on
- or personal information that you otherwise voluntarily provide to us.

Use of Personal Data

We only process your personal data where applicable law permits or requires it, including where the processing is necessary for the performance of any contractual relationship with you or the company you work for.

We may process your personal data for the following legitimate business purposes:

- performance and/or administration of a contract between you or the company/partnership you work for where you are a named contact
- conducting performance reviews and determining performance requirements
- assessing qualifications for a particular job or task
- complying with applicable law



DONCASTERS

- complying with health and safety obligations, particularly around visits to our sites
- accounting and auditing purposes.

We will only process your personal data for the purposes we collected it for or for compatible purposes. If we need to process your personal data for an incompatible purpose, we will provide notice to you and, if required by law, seek your consent. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

We may also process your personal data for our own legitimate interests, including for the following purposes:

- to prevent fraud
- to ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution
- to support project administration
- to report up to our Executive or Board.

Collection and Use of Special Categories of Personal Data

Given the nature of our business we do not anticipate the need to collect or use any of the special categories of personal data that are considered sensitive under the laws of your jurisdiction, and which may receive special protection. In the event we do collect or use any sensitive personal data we will do so in accordance with relevant law.

Data Sharing

We will only disclose your personal data to third parties where required by law or to our employees, contractors, designated agents, or other third-party service providers who require such information to assist us with the performance or administering of any contractual or other relationship that exists between us. These third-party service providers may be located outside of your home jurisdiction.

We require all our third parties, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations. We do not permit our third-party service providers who process your personal data on our behalf to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with the terms of any agreement or understanding that exists between us.

We may disclose your personal data:

- during emergency situations or where necessary to protect the safety of persons
- where the personal data is publicly available
- if a business transfer or change in ownership occurs and the disclosure is necessary to complete the transaction
- for additional purposes with your consent where such consent is required by law.



DONCASTERS

Cross-Border Data Transfers

Where permitted by applicable law, we may transfer your personal data to the United States and other jurisdictions that may not be deemed to provide the same level of data protection as your home country, as necessary for the purposes set out in this Privacy Notice.

Data Security

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure.

Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

Rights of Access, Correction, Erasure, and Objection

By law you may have the right to request access to, correct, and erase the personal data that we hold about you, or object to the processing of your personal data under certain circumstances. You may also have the right to request that we transfer your personal data to another party. If you want to review, verify, correct, or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us at GDPRInquiry@doncasters.com. Any such communication must be in writing.

We may request specific information from you to help us confirm your identity and your right to access.

Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we may have destroyed, or erased data about you. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Data Protection Officer

We have appointed a Data Protection Officers, both in the UK and in Germany, to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal data, please contact the Data Protection Officer at: GDPRInquiry@doncasters.com If you are unsatisfied with our response to any issues that you raise with the Data Protection Officer, you may have the right to make a complaint with the data protection authority in your jurisdiction by contacting the data protection authority.

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time.

Reviewed: June 2024