

Privacy Information for the TrackIt Application

Heidelberg Materials UK

1. Background and purpose of this privacy information

For the complex logistics processes managed by us, our planners need to be provided with certain data of drivers and trucks and need to be able to communicate with the individual drivers in connection with the execution of orders. TrackIt is the software solution that supports us for the aforementioned purposes.

Please read this privacy information carefully, as it describes how Heidelberg Materials group companies process your personal data when you use the TrackIt application.

This privacy information applies to drivers who use the TrackIt application when delivering products (materials of any kind) for Heidelberg Materials. This privacy information therefore applies to our employed drivers (employees) and also drivers employed by third parties (external haulier). The company responsible for the processing of your personal data (also called controller) and the relevant contact details are set out below in section 2.

References to the TrackIt application means the TrackIt application, as pre-installed on the device in the truck you are driving or the app you have or that was downloaded to your personal or business smartphone. In the latter case, we encourage you to use your business smartphone and not your personal. Please also note that certain data may be processed by the provider of the TrackIt application, which is Command Alkon Inc. You can read the privacy information, as well as the user agreement (EULA) of Command Alkon before you log-in to the application (at the bottom of the log-in screen, please scroll down as needed).

2. Identity and the contact details of the controller and data protection officer

The company that is responsible for the processing of your personal data (ie the controller) depends on whether you are an employee of a Heidelberg Materials group company or a driver that is contracted via a third party hauler.

If you are an employed driver of Heidelberg Materials UK then your employer and data controller is Hanson Quarry Products Europe Ltd. If you have any data protection or other concerns regarding this policy please contact the Legal Department at our Maidenhead office.

If you are **not an employee** of a Heidelberg Materials group company but are an external haulier, please contact your employer for details of your data controller.

3. Personal data processed, purpose and legal basis

We process the following personal data about you when you use the TrackIt application:

- a. Registration and log-in information: You have been registered as a driver by Heidelberg Materials and log-in information was provided to you separately. We use your registration data (SAP employee ID, name (pseudonym, fictional name), employee type, default plant) and log-in information (SAP employee ID or name (pseudonym, fictional name), vehicle ID, phone number) for the purpose of granting you access to TrackIt and contacting you, where needed. The registration and log-in information typically allows the association with the truck master data. If you are an employed driver of Heidelberg Materials, your personal data will be processed for the performance of the existing employment contract. If you are an external haulier, the legal basis for processing is the legitimate interest of the respective Heidelberg Materials company (refer to section 2 above) to granting access only to registered vehicles and drivers.
- b. Question verification: Verification questions as regards the vehicle and areas need to be answered by a driver after log-in for granting access to TrackIt. The verification is needed for safety purposes. If you are an employed driver of a Heidelberg Materials group company, your personal data will be processed for the

performance of the existing employment contract. If you are an external haulier, the legal basis is the legitimate interest of the respective Heidelberg Materials company (refer to section 2 above) to ensure a safe driver environment.

- c. Location information: Your GPS position data is collected at 1-3 minute intervals during the execution of a delivery as long as you are logged on. To stop GPS data collection, you must log-out (e.g. during a pause). The GPS position is collected for the purpose of:
- i. giving us the opportunity to localize you on a map for the purpose of managing our logistics and disposition processes, including in particular the dispatch of products to the truck (e.g. sending you automated notifications when certain landmarks (so-called geo fences) are crossed). The objective is to use transport capacities efficiently (e.g., for just in time deliveries) and to ensure that certain materials are not damaged due to their perishability (e.g., concrete). In particular, we can ensure that orders and tickets are assigned to trucks and drivers who have the required qualifications and permits (in the case of drivers), properties (in the case of lorries) and capacities. We can also ensure providing you with location specific related information, where needed.
 - ii. giving us the opportunity to assess the delivery status for sharing with dispatchers and the customer (or their authorized representatives). These are typically automated notifications that are created when certain geo-fences are passed or certain status of the delivery are triggered (such as waiting for delivery instruction, waiting for loading, loading, unloading, loaded, on way to customer, at customer, waiting for loading). The status is needed for planning purposes and to enable the customer to prepare for the receipt of the load.
 - iii. enabling you to send status notifications that you enter via the TrackIt App (e.g., "loaded", "arrive site"). The notifications will be stored and transmitted by the app to inform the dispatcher and customer on the status of the delivery for the purpose of managing the dispatch and receipt of the load.
 - iv. providing customers with the last known location of their respective delivery, visible to the Customer on a map which the Customer may view via their own login to OnSite , this will be based on the Drivers last known GPS data collected at 1 to 3-minute intervals during the **entire** execution of a delivery (from the dispatching plant to the delivery location) if the Drivers are logged on to the app. However Customers will not receive exact GPS coordinates for any Driver.

If you are an employed driver of a Heidelberg Materials group company, your personal data will be processed for the performance of the existing employment contract. If you are an external haulier, the legal basis is the legitimate interest of the respective Heidelberg Materials company (refer to section 2 above) to carrying out efficient logistics processes, e.g. ensure that orders are assigned to those trucks and drivers who have the necessary qualifications and permits (for drivers) and characteristics (for trucks). Furthermore, to ensure that the type and duration of the transport, taking into account the route, truck characteristics and special transport goods, does not lead to damage to the truck and/or transport goods or to a lack of quality of the transport goods on arrival.

- d. Mobile ticketing: You can provide ad-hoc information about a certain ticket you are assigned to, such as addition of water to a delivery, updating the ticket status, unloading method, returned material, driver comments, and collecting the signature and potential comments of a recipient. The purpose is to digitalize ticket information that would otherwise be collected physically on paper. If you are an employed driver of a Heidelberg Materials group company, your personal data will be processed for the performance of the existing employment contract. If you are an external haulier, the legal basis is the legitimate interest of the respective Heidelberg Materials company (refer to section 2 above) to optimize its business

processes by digitalizing the ticket process and collecting dispatch related information in digital form.

- e. Mobile device management: Limited device and network information (such as device status, battery, IP address, device model, IMEI) is processed for troubleshooting purposes, and to make sure that your device and TrackIt application is up to date and in function, as well as secure. The legal basis is the legitimate interest of the responsible Heidelberg Materials company (refer to section 2 above) to provide devices in accordance with internal policies and procedures.
- f. Navigation: Unless you use TrackIt on your mobile phone, you can choose, at your sole discretion, a navigation function. Please note that when you choose using this functionality by clicking on the Google maps excerpt, Sygic opens for the purpose of navigating you to the destination. The purpose of processing is providing you support with your navigation to the destination. The legal basis is your consent, which is given by activating the function by clicking on the map.
- g. Push to talk / voice over IP: Unless you use TrackIt on your mobile phone, you can use a "push-to-talk radio functionality" for communicating in real-time with the dispatcher or other drivers in your assigned channel. The purpose is providing you an easy way for communication while on the road with the dispatcher and/or group of drivers. The legal basis is your consent, which is given by participating in a communication.

4. Recipients or categories of recipients of the personal data

Your personal data may be transferred to the following recipients or categories of recipients:

- Heidelberg Materials AG for the purpose of making available and supporting the technical infrastructure of the TrackIt Application; and
- other Heidelberg Materials group companies, where the receiving group company provides either supporting activities as part of the logistics process, or processes the personal data for own purposes, as further described under section 3 above.
- Your location data whilst using the TrackIt Application may also be visible to customers or their agents for the purpose of tracking their delivery which you are currently transporting from time to time.

5. Transfer of personal data to a third country

In very limited circumstances, end-user support will be provided from countries located outside the EU. In addition, if you activate the navigation and/or communication function, personal data may be processed by the service provider outside the EU. We make sure that the transfer of your data is protected by one of the following:

- The recipient is subject to an approved certification mechanism or code of conduct with binding and enforceable commitments that provide appropriate safeguards for your personal data;
- We have put in place appropriate contractual safeguards to protect your personal data. These contracts incorporate specific data protection provisions as directed by the European Commission;
- The transfer to a foreign jurisdiction is expressly permitted by applicable laws; or
- You explicitly consent to the transfer.

6. Deletion

Personal data are only processed and stored for the period required for the achievement of the processing purposes pursuant to section 3. As a general rule, (i) location information and related data is deleted after 3 years (ii) registration and log-in information is deleted a reasonable period after you no longer drive for a Heidelberg Materials company, (iii) mobile ticketing data is deleted after 3 years, starting with the dispatch, (iv) navigation data immediately (but please refer to the Google privacy notice with respect to Google's deletion

practices) and (v) communication information is deleted immediately (ie push-to-talk data is not stored at all).

Thereafter, we routinely anonymize or delete the personal data, unless we are under the obligation to store them longer due to retention and documentation obligations under tax and commercial law pursuant to Art. 6 (1) lit. b GDPR or further processing is required due to ongoing legal disputes, or you have consented to longer storage pursuant to Art. 6 (1) lit. f GDPR.

7. Your rights

- Pursuant to Art. 15 GDPR, you have the right to obtain – free of charge – information about the personal data stored concerning you.
- Pursuant to Art. 16, 17 and 18 GDPR, you also have the right to rectification of inaccurate data as well as restriction of processing and erasure of your personal data.
- Under the conditions specified in Art. 20 GDPR, you also have the right to receive the stored data concerning you in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance from us.
- Furthermore, pursuant to Art. 21 (1) GDPR, you have the right to object to the processing of personal data concerning you on the basis of Art. 6 (1) lit. f GDPR on grounds relating to your particular situation.
- Moreover, every data subject has the right to lodge a complaint concerning our processing of data with a data protection supervisory authority.

If you would like to exercise your aforementioned rights, please contact the group data protection officer of Heidelberg Materials, whose contact details are provided in section 2.

8. Other

The provision of personal data is a requirement necessary to enter into a contract with Heidelberg Materials or to provide services to Heidelberg Materials. You are obliged to provide the personal data because if you fail to provide the personal data, you cannot drive for Heidelberg Materials.

We do not conduct automated decision-making, including profiling, based on the personal data collected.