

MANTRAC GROUP DATA PRIVACY STATEMENT

(INCORPORATING DELTA GROUP)
(EXCLUDING HR DATA)

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1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

Mantrac Group Companies (UHL, subsidiaries and associated companies within Egypt under beneficial control) are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all Customers, Prospective customers and suppliers.

Mantrac Group Companies are a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.
7. Not transferred to any third parties other than in accordance with applicable regulations.
8. Held in a manner which enables you to exercise certain rights (as outlined below) in connection with the information we hold relating to you.

3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). Samples of data we may collect include, but are not limited to:

Customers:

We may collect, store, and use the following categories of personal information about you:

- Business Contact Information (e.g., company name, address, telephone number);
- Individual Representative Contact Information: (e.g., name, address, telephone number, email address);
- Billing Information (e.g., financial account data, invoices, receipts);
- Client Relationship Management Information (e.g., information necessary to populate a customer's profile or to facilitate marketing automation);
- Repair Information (e.g., repair needs and status);
- Warranty Information (e.g., purchase history, extended warranties); and
- Customer Satisfaction Information.

Prospective Customers:

We may collect, store, and use the following categories of personal information about you:

- Business Contact Information (e.g., company name, address, telephone number);
- Individual Representative Contact Information: (e.g., name, address, telephone number, email address); and
- Client Relationship Management Information (e.g., information necessary to populate a customer's profile or to facilitate marketing automation).

Suppliers:

- Residency Information (e.g., work permit status);
- Financial Account Information;
- Background Information (e.g. due diligence);
- Professional Qualifications Information (e.g., work experience, education); and
- Reference Information (e.g., letters of recommendation or reference, or reports provided by former employers or colleagues).

Additionally, in some cases, such as where you are the sole proprietor of a business, information about your company may be deemed personal information. This could include business information (e.g., office address), financial account information (e.g., bank account information, trade references, financial statements), assets (e.g., property ownership), credit rating, tax identification, and diversity classification.

There are “special categories” of more sensitive personal data which require a higher level of protection.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Background Information (e.g., marital status, dependent information, ethnicity and/or nationality, credit and criminal background checks, and drug and alcohol testing); and
- Biometric Information (e.g., thumbprints).

4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

Mantrac Group collects personal information in a variety of contexts from different categories of persons.

Customers: (either directly or, in some cases, through third parties) can provide personal information through the business relationship involved in acquiring, marketing, or selling products or services. This includes, for example, submission of personal information as part of a proposal, a contract, receiving and employing services or products (including repair and warranty services), and potentially accessing systems or monitoring processes. Throughout the duration of a customer relationship, Mantrac reserves the right to request, as needed, other forms of personal information necessary to facilitate the purposes described below.

Prospective Customers: (either directly or, in some cases, through third parties) can provide personal information by contacting Mantrac Group directly in person or via electronic means (web sites etc). In addition, Mantrac Group may obtain such information from publicly available sources (the web, trade directories etc).

Suppliers: can provide personal information through the business relationship involved in acquiring, marketing, or selling Mantrac supplied products or services. This includes, for example, submission of personal information as part of a proposal, a contract, delivering services or products, and potentially accessing systems or monitoring processes. Throughout the duration of a supplier relationship, Caterpillar reserves the right to request, as needed, other forms of personal information necessary to facilitate the purposes described below.

Mantrac Group processes your personal information where it is permitted to do so under applicable data protection laws, including for the purposes of its legitimate interests, to comply with a legal obligation, or where you have consented for Mantrac to do so. In some cases, your consent to the collection of your personal information may be provided in a manner appropriate to the context, meaning it can be provided orally, in writing, electronically, or—when permitted by local laws—it may be implied where the purpose is apparent from the circumstances and you voluntarily provide your personal information. Where Mantrac must obtain explicit consent from you. Such consent is your choice and is entirely voluntary. In some circumstances, you may withdraw your consent to Mantrac’s collection and use of personal information subject to contractual and legal restrictions and reasonable notice.

5. HOW WE WILL USE INFORMATION ABOUT YOU

5.1 Situations in which we will use your personal information

We need all the categories of information collected primarily to allow us to manage our relationship with you in order to operate our business and to enable us to comply with our legal and regulatory obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The reasons for which we, or a contracted third party, will process your personal information are listed in Table 1 below.

Some of those purposes for processing will overlap and there may be several purposes which justify our use of your personal information.

Table 1. Categories, Purpose, and Legal Bases of Processing: Non-Human Resources Data

Data Subjects	Categories of Personal Data	Purposes of Processing	Legal Basis for Processing
Customers and Suppliers	Contact Information (e.g., name, address, telephone number, company name) Billing information (financial accounts data, invoices receipt, residence information) Client Relationship Management information Electronic identification information (e.g., email), system usage and preferences	Facilitate communications Evaluation and potentially entering into a business relationship or contract, including potentially preparing bids (responses to bids) and other requests that relate to the potential business To facilitate financial transactions and management; Audit Fulfilling our compliance obligations (e.g., anti-money laundering, screening against sanctions lists) Management of our IT systems and to provide services	Performance of a contract Comply with legal requirements Legitimate interest (to manage the relationship)
Customers	Contact information (e.g., name, address, telephone number, company name) Billing information Credit worthiness Electronic identification information (e.g., email), system usage and preferences	Repair and Warranty Information Conducting credit reference checks and financial due diligence Performing customer satisfaction survey Perform data analysis to improve our service and your experience as a customer	Performance of a contract Legitimate interest (to receive feedback on customers experiences)
Prospective Customers and Subscribers to	Contact Information (e.g., name, address,	To inform you about our activities, sending you our newsletter, sending you our	Legitimate interest (communicating about related

our newsletters or other marketing activities	telephone number, company name) Electronic identification information (e.g., email) and preferences	reports, share exciting new information about our products	products or services) Consent
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5.2 If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing you with a product), or we may be prevented from complying with our legal or regulatory obligations.

5.3 Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our Data Protection Policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

6.1 Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights. In limited circumstances, we may approach you for your written or other explicit consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is your choice if you agree to any request for consent from us.

7. AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.

2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.

3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

8. DATA SHARING

We may have to share your data with third parties, including manufacturers, suppliers, third-party service providers and between legal entities in the group. We require third parties to respect the security of your data and to treat it in accordance with the law. We may transfer your personal information in or outside of the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

8.1 Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

8.2 Which third-party service providers process my personal information?

“Third parties” include third-party service providers (including contractors and designated agents). Selected activities are carried out by third-party service providers which include (but are not limited to), surveys and telesales.

8.3 How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions

8.5 What about third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

8.6 Transferring information outside the EU

We may transfer the personal information we collect about you between Group Companies in the following countries outside the EU; Egypt, Kenya, Tanzania, Uganda, Ghana, Nigeria, Sierra Leone, Liberia, UAE, Iraq and Russia. This transfer is covered by an agreement between Unatrac Limited and Unatrac Holding Limited, its subsidiaries and companies in Egypt under beneficial control inclusive of model clauses. Transfer of data to other countries will also be covered by similar agreements.

9. DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures may be obtained by emailing datagovernance@mantracgroup.com

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained by emailing datagovernance@mantracgroup.com

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10. DATA RETENTION 10.1 How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available on request by e mailing datagovernance@mantracgroup.com. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

11. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

11.1 Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

11.2 Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

11.3 No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded, excessive or unduly repetitive. Alternatively, we may refuse to comply with the request in such circumstances.

11.4 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

12. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact datagovernance@mantracgroup.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

13. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.