

## Privacy Statement TM CONSTRUCTION B.V.

### 1. Who is this Privacy Statement intended for?

This Privacy Statement relates to the processing of personal data of everyone who performs work (hereinafter also: you) for TM CONSTRUCTION BV (hereinafter also: we):

- **Employees:** Salaried employees and hired staff
- **Freelancers (ZZP'ers):** Self-Employed individuals without staff with a service agreement.

TM CONSTRUCTION BV respects your privacy and complies with the requirements of the General Data Protection Regulation (GDPR/AVG).

### 2. Who is responsible for processing your personal data?

TM CONSTRUCTION BV is responsible for processing your personal data to be able to execute the employment relationships or the service agreement.

### 3. Which data do we process?

Which data we process depends on your role, the purpose, and whether this purpose applies to you. We process the following (groups of) data as shown in the differences below:

- Data regarding identification and communication (e.g., name and address).
- Data regarding safety (e.g., Digital Safety Passport/DVP).
- Data regarding employment relationship/assignment.
- Data regarding the management of payroll or financial administration.
- Data regarding education, screening, and performance.
- Data regarding absenteeism and (sustainable) employability.
- Data regarding the location of the vehicle provided to you.
- Data regarding digital traffic (e.g. log files).
- Data regarding equipment (e.g., clothing, shoe size, and Personal Protective Equipment/PPE).

### 4. For what purposes do we process which personal data?

We reasonably process the data necessary to be able to execute the employment relationship. Below we list the purposes for which we may process your data; not every purpose necessarily applies to you:

#### a. Purpose: Agreement (ZZP/Employment/Hiring)

For the execution of agreements with Freelancers (ZZP'ers), including hours, insurance, financial administration, and communication regarding work execution. For the execution of employment or hiring agreements, including personnel, salary, and payroll administration. Personnel administration also includes planning, leave, (preventive) absenteeism, incapacity for work, reintegration, personal development, and training.

#### b. Purpose: Employability

To discuss suitability, employability, and general well-being.

#### c. Purpose: Company vehicle

To provide a lease car or company vehicle and to monitor its location

**d. Purpose: Informing**

To inform employees about relevant matters such as training, pension schemes, changes to the collective labor agreement, vacancies, and staff magazines.

**e. Purpose: Insurance claims**

To settle claims related to collective accident insurance or other employee-related insurances.

**f. Purpose: Physical access**

To grant access to office buildings and project locations.

**g. Purpose: Online access**

To grant access to and allow use of private web environments, portals, and the intranet.

**h. Purpose: Digital Safety Passport**

For the production of a digital safety passport (DVP).

**i. Purpose: Personal Protective Equipment**

To provide PPE such as a helmet or work boots.

**j. Purpose: Controls**

Internal/external controls, audits, and accounting checks; promoting and maintaining business safety; and registration and control of internet and email traffic.

**k. Purpose: Legal compliance**

To comply with laws and regulations, such as providing data to tax authorities or following court orders.

**l. Purpose: Insurance claims**

To settle claims related to insurances for Freelancers

**5. How is your personal data collected?**

Data is obtained in several ways, and not every method necessarily applies to you::

**General**

- Provided by you directly.
- From your personnel file or HR system
- From the leasing company (for company vehicles)
- From internal or external persons involved in your supervision, training, or development

**Digitaal**

- Through the use of TM Construction BV website(s) and cookies
- Through monitoring of internet and email traffic.
- Through camera surveillance (typically used for safety in specific locations with consent from the Works Council/OR)
- Cookies stored on your computer or mobile device

**6. How is your personal data secured?**

We take appropriate organizational and technical measures to prevent misuse, loss, unauthorized access, unwanted disclosure, unauthorized modification, or other unlawful processing. Employees with

access to your personal data are bound by confidentiality and only access data if necessary for their role. We sign processor agreements with third parties to ensure legal levels of security and confidentiality of your personal data.

### 7. What rights do you have and how can you exercise them?

The GDPR provides rights to safeguard your privacy, which apply to you as a worker. Your rights include:

- Right of access to your personal data:
- Right to correction/supplementation of your personal data

Additionally, in a limited number of specific cases, you also have the following rights:

- Right to deletion of your personal data:
- Right TO restrict the processing of your personal data:
- Right to data portability of your data:
- Right to object to the processing of your personal
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A request to exercise one or more of the above rights can be submitted in writing to our privacy contact person, reachable via [monika@tmconstruction.nl](mailto:monika@tmconstruction.nl). When we receive a request, we will first perform a balancing of interests and assess whether we are able and permitted to comply with the request, depending on the nature of the request. We will then send you an appropriate response.

If you have not received a response to your request in a timely manner, or if the request has been rejected, you may lodge an objection with the Privacy Taskforce of TM Construction BV. Furthermore, you always have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) or to initiate legal proceedings in court.

### 8. Provision of personal data to third parties

We may share data with:

- Clients or customers of TM Construction BV
- Companies within the TM Construction BV group
- Service providers acting on our behalf
- Regulators, tax authorities, or other legal entities to fulfil legal obligations
- Other companies during a merger, acquisition, or reorganization

### 9. How long is my personal data kept?

Data is kept no longer than necessary for its original purpose, unless a longer legal retention period applies.

### 10. Changes

We reserve the right to unilaterally adjust this Privacy Statement. We will inform you of any adjustments. This statement was updated on **April 13, 2026**.

### 11. Contact/ Questions

For questions regarding this privacy statement, please contact the Privacy contact person at [monika@TMCONSTRUCTION.nl](mailto:monika@TMCONSTRUCTION.nl).