

MSITE PLATFORM PRIVACY POLICY

Last Updated: June, 2024

Human Recognition Systems Ltd. trading as and hereby known as MSite understand and appreciate the importance of privacy. This Platform Privacy Policy (the “Policy”) explains how we process personal data collected, stored or processed by us through MSite platforms.

The MSite Platform is a tool used by construction businesses (the “Principal Contractor(s)”) and their employees, contractors, agents and authorized users (“End User(s)”) to manage workforces through the entire journey of projects’ pre-site, on-site, and in-site phases. Collectively, Principal Contractors and End Users are “Platform User(s)”.

This Policy applies to personal data that Principal Contractors submit to us as the controllers of that data via the Platform; the personal data we collect, access, store, use or otherwise process via the Platform on behalf of Principal Contractors; and other personal data we process from End Users of the Platform (together the “Platform Data”).

1. Who is Responsible for Your Personal Data

In providing our services, we process personal data on behalf, and at the direction of, Principal Contractors. When we process personal data on behalf of Principal Contractors, MSite acts as a “Data Processor”, and the Principal Contractors are “Data Controllers”. Principal Contractors are solely responsible for establishing privacy policies for and ensuring compliance with all applicable laws and regulations, agreements, or other obligations, relating to the processing of personal data collected through our Platform. If you are an individual who has submitted data to a Principal Contractor through our Platform, then the processing of your personal data will be subject to that Principal Contractor’s privacy practices, and you should directly contact that Principal Contractor for assistance with any requests or questions relating to the processing of your personal data and we suggest that you read the principal contractors privacy policy to ensure you understand their practices

2. Personal Data We May Collect About You

Information is provided by you on your MSite account during onboarding or preregistration. This information will allow you to either access various parts of the Platform or complete work on-site on behalf of the Principal Contractor. We may collect the following categories of personal data when you register for and/or use the MSite Platform:

- Your name
- Your Employee Profile Image (Photo)
- Your address and postcode
- Your email address

- Your telephone number
- Your occupation/trade
- Your National Insurance Number
- Your Date of Birth
- Your Next of Kin details and telephone contact number
- Your relationship to Next of Kin (where provided by You)
- Your Biometric data
- Where applicable, PIN Code access data and login details are issued to you for administration and access to the MSite System.
- Details of your entry/exit logs using the MSite access terminals at Principal Contractor sites

In addition to the above information and only upon the Principal Controller's instruction, MSite may request the following information.

- Your Health data
- Your Thermal Image Temperature
- Your Equality and Diversity Information
- Where applicable, details of training records, qualifications, accreditations and Construction Skills Certification Scheme cards
- Details of any work-related incidents involving or affecting you

Information Collected Automatically

- Log Information. We may automatically collect log data such as your Internet Protocol ("IP") address, browser type, pages viewed, the date and time you access our servers, device type, device operating system and other diagnostic data. This data is used for various reasons, including security and providing the services.
- Location Information. We may infer the generic physical location and geographic regions of your device, or collect your location information depending on the services used by Principal Contractors on the Platform.
- Time & Attendance Information –Details of your entry/exit logs using the MSite access terminals at Principal Contractor sites that the Principal Contractor may use to calculate hours workers ensure accurate pay and prevent fraud.
- Cookies. The Platform may use cookies or similar technologies depending on the services used by Principal Contractors on the Platform.

Sensitive Personal Data We May Collect

Depending on the services used by Principal Contractors on the Platform, we may collect certain sensitive personal data from you:

- A biometric finger/ thumbprint/face image uploaded to enable the use of the MSite System biometric access terminals.
- An employee profile image (photo) uploaded to MSite to provide visual identification.
- Health data (medical condition recording (optional) required to support obligations in health and safety management.
- Equality and Diversity information (optional) to support equality objectives either set by us as the Principal Contractor or required by contract or law.

3. How and Why We Use Your Personal Data

- **Workforce management** (This includes providing services to Principal Contractors, such as being able to track and monitor time and attendance, document completion of induction, monitoring and verification of training records, supporting effective resource planning, track labour hours which the Principle Contractor may link to pay or use as a fraud prevention measure and where applicable ensuring operatives are not victims of modern slavery)
- **Site Management** (This includes providing services to Principal Contractors, such as ensuring access to the Principal Contractors' site, tracking and validating accuracy of working time, reviewing entry and exit logs, administrating and maintaining MSite including sharing data with third-party suppliers and processors)
- **Project Management** (This includes providing services to Principal Contractors, such as providing reports to authorised principal contractor management staff or personnel of clients, client auditors or sub-contractors who have a strict need to know)
- **Health and Safety Obligations** (Reporting of data including training, briefings, records of any medical conditions or notification of a medical condition, to ensure adequate controls and improve or maintain the health and safety of employees and operatives working or entering the Principal Contractors site)
- **Sustainability** (Including reporting on CFC emissions data in connection with travel to and from Principal Contractor sites to enable effective responses to statutory, regulatory or contractual requirements set by Principal Contractors and/or public authorities)
- **Equality, Diversity and Inclusion** (formal reporting of worker demographics to support our social and legal obligations to enable effective responses to statutory, regulatory or contractual requirements set by Principal Contractors and/or public authorities)
- **Legal Claims and other Regulatory Compliance** (where necessary, we may use personal data to support the establishment/ defending or pursuing of legal claims or regulatory claims)
- **Detect and Prevent Fraud and Security Risks** (where necessary to process your personal data to help monitor, prevent and detect fraud and abusive use of the Platform, monitor and verify your identity so that unauthorized users do not gain access to your information, enhance system security, and combat spam, malware, malicious activities or other security risks)
- **Improve the Platform** (where permitted and authorized by Principal Contractors, we may use End Users' personal data to derive analytical and statistical data to better understand the way End Users use and interact with our Platform to improve our services)

Principal Contractors may use the personal data collected via the Platform for additional purposes, you should review their privacy policies for more information about how they collect, use, and share the personal information collected via the Platform.

4. Sharing and Transferring Your Personal Data

We share the personal data and sensitive personal data collected with Principal Contractors, on whose behalf we collect such information or operate Platform. This Policy does not apply to the

processing (including collection, use and sharing) of Platform User personal data by Principal Contractors, and we are not responsible for such processing.

Other than as stated above, MSite may share personal data collected from Platform Users under the following circumstances ;

- **Clients, joint venture partners** (This includes being able to track and monitor, document completion of induction, monitoring and verification of training records, supporting effective resource planning)
- **Sub-Processors** (We may share Platform Users' personal data to parties, including MSite affiliates, acting as its Sub-Processors, such as Amazon Web Services, Twilio, Loquate, HERE, ESRI, Microsoft Azure and Construction Skills Certification Scheme Limited. These Service Providers will only have access to the information needed to perform these limited functions on our behalf.)
- **Other third parties** (professional advisors, auditors, regulators, government departments, law enforcement authorities, insurance companies, relevant ombudsman, dispute resolution bodies, Courts or persons in connection with any sale merger, acquisition disposal, reorganisation or similar change in the Principal Contractors business)

5. Additional Notice To Individuals In The European Economic Area, The United Kingdom, And Switzerland

This section only applies to Platform Users using or accessing our Platform while located in the European Economic Area, the United Kingdom, or Switzerland (collectively, the "European Countries") at the time of data collection pursuant to the European Union's General Data Protection Regulation, the UK General Data Protection Regulation or the Swiss Data Protection Act (collectively, the "GDPR").

Our Relationship to You. The Processor for the processing described in this Privacy Policy is: Human Recognition Systems Ltd. d/b/a MSite, at The Bunker, 25 Innovation Boulevard, Liverpool, England, L7 9PW. You can contact our privacy office at DPO@MSite.com.

Legal Basis for Processing Your Personal Data and Sensitive Personal Data

Personal Data

- **Performance of a contract** (for example, administering your Platform user account, workforce, site and project management)
- **We have legal obligations** (for example, Health and Safety at Work Act, Immigration and Nationality Act, Immigration Act, Construction and Design Management Regulation and other applicable work safety and work authorization requirements)
- **We have a legitimate interest** (for example, validating project working time, checking the accuracy of training records, responding to reporting requirements, ensuring the security of the project sites, Health and Safety and defending against potential legal claims).

Sensitive Personal Data

- **We have your explicit consent** (for example to allow us to process your biometric data – you can withdraw your consent at any time by contacting the Principal Contractor or MSite, following your withdrawal of consent, a PIN code or alternative method of site access will be arranged for you)
- **Necessary for preventative or occupational medicine** (for example your health data is required to ensure the health and safety of you and others on the Principal Contractors' project sites as required by Health and Safety Laws and regulations)
- **Archiving, research and statistics** (for example equality and diversity data made available by you which is required for corporate social responsibility, diversity and equality reporting, and where applicable to be provided to external authorities)

Right to Lodge a Complaint. You may have the right to lodge a complaint with your local data protection authority about our processing of your personal data. Contact details for data protection authorities in the European Economic Area are available [here](#), and contact details for the United Kingdom's ICO are available [here](#).

6. Security

We implement security measures intended to protect against the loss, misuse and alteration of the personal data we process on behalf of our Principal Contractors. While we use reasonable commercial efforts to protect the data, no technology, data transmission, or system can be guaranteed to be 100% secure. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such information, nor can we guarantee that the information you supply will not be intercepted while being transmitted over the Internet.

Please remember that you play a valuable part in security as well by keeping all your devices, logins and or passwords and pins secure. If you feel that the security of any account you might have with us has been compromised, you should contact us immediately as described in the [Contact Us](#) section.

7. Where and How Long We Store Your Personal Data

Most of your data is provided by you and is only accessible by the Principal Contractor, MSite or the third parties mentioned above via the MSite Platform.

We will only store your data for as long as necessary for the Principal Contractor to process such personal data for the purposes set out in this Policy and in accordance with the Principal Contractor's internal retention policies and procedures.

8. Your Privacy and Data Protection Rights

Depending on applicable law where you reside or are located, you may assert certain rights identified below with respect to your personal data:

- Right to Know/Access.
- Right to Correct/Rectification.
- Right to Delete/Erasure.
- Right to Portability.
- Right Against Discrimination.
- Right to Object to Automated Decision-Making.
- Right Not to Provide Consent or to Withdraw Consent.
- Right to Restriction.
- Right to Object to Processing.
- Right to Lodge a Complaint.
- Right to Opt Out of Sale.
- Right to Opt Out of Sharing for Targeted Advertising.

If you are an individual who has submitted data to a Principal Contractor through our Platform and would like to assert one of the above-listed privacy rights, please directly contact that Principal Contractor for assistance with any requests or questions relating to the processing of your personal data. You may also make such requests by contacting us at DPO@MSite.com and providing the name of the Principal Contractor. We will refer such requests to that Principal Contract and will support them as needed in responding to your request.

9. Contact Us and Complaints

If you have any questions or concerns about the processing of your personal data, you can contact the Principal Contractor directly. Should you have any questions or concerns regarding MSite and how your data is processed you can also contact MSite by email at DPO@MSite.com.

If you are not happy with how your data is held or processed by us, or if you are not satisfied with our handling of any requests by you about your rights, you may raise a complaint with the Principal Contractor or contact MSite's Data Protection Officer via the email address provided above.

10. Changes to This Privacy Policy

We may update to this Policy from time to time. The "Last Updated" date at the top of this page indicates when this Policy was last updated. If we make material changes to this Policy, we will notify you either by the most recent email address provided to us, through a pop-up window on our Platform, or through another method as required by law. Any changes to this Policy will become effective on the "Last Updated" date indicated above.

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