

MSITE PLATFORM EU PRIVACY POLICY

Last Updated: October 2025

We are Infobric Limited trading as MSite (registered in the UK, Company Number 04363275 and ICO reference ZA068354). This Platform Privacy Policy (the “Policy”) explains how we use Personal Data processed by us through the MSite Platforms.

The MSite Platform is a tool used by construction businesses (the “Principal Contractor(s)”) and their employees, contractors, agents and authorised users (“End User(s)”). The Platform manages workforces through the entire journey of a project, including the 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 via the Platform, which we then process on their behalf
- This Personal Data is usually that of the End Users (referred to as “you” in this Policy)
- This Personal Data is collectively referred to as “Platform Data”.

1. Who is Responsible for your Personal Data

In providing our services, we process Personal Data on behalf of and under the instructions of Principal Contractors. Under UK data protection law, MSite acts as a “Data Processor”, and the Principal Contractors are “Data Controllers”. The Principal Contractors decide what and why Personal Data will be used.

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. Therefore, you should directly contact that Principal Contractor for assistance with any requests or questions relating to the processing of your Personal Data. We suggest that you read the principal contractors privacy policy to ensure you understand their practices.

2. Personal Data We Process about You

All data we processed is on the Principal Contractor’s instructions. These may vary from instance for instance.

Information is provided by You via 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 (face or fingerprint)
- 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, and only upon the Principal Controller's instruction, MSite may use the following information.

- Your health data
- 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 worked, ensuring accurate pay and preventing fraud.
- Cookies. The Platform may use cookies or similar technologies depending on the services used by Principal Contractors on the Platform.

Special Category Personal Data We May Process

Depending on the services used by Principal Contractors on the Platform, we may collect certain more sensitive Personal Data from you:

- A biometric finger/thumbprint uploaded to enable the use of the MSite System biometric access terminals.
- Your profile image (photo) uploaded to MSite to provide visual identification
- Health data (medical condition optional if 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. Purposes of Processing (as instructed by Principal Contractors)

- **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/defence or pursue 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 unauthorised 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 authorised 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

MSite may share Personal Data collected from Platform Users under the following circumstances:

- **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. Cross Boarder Transfers

Your Personal Data collected via the Platform is stored in the UK. Personal data can flow freely from the EEA to the UK because the UK is currently an "adequate" country for data protection purposes. MSite, in accordance with the Principal Contractor's instructions, may transfer your Personal Data to other data processors which are highlighted above who reside outside EEA. In such an event, we will ensure that your personal information receives the protections are dictated by the relevant data protection laws, such as standard contractual clauses.

6. Lawful Bases for Processing

Principal Contractors, as the controllers, determine the applicable lawful bases under the EU GDPR. As a processor, MSite relies on their instructions and does not set lawful bases for this processing.

Possible Lawful Bases for Processing Personal Data

- **Consent** (for example, for the use of biometrics)
- **For the performance of a contract** (for example, site access control for you as a contracted worker)

- **Legal obligations** (for example, national laws on health and safety, immigration and other applicable work safety and work authorisation requirements)
- **Legitimate interests** (for example, validating project working time, checking the accuracy of training records, responding to reporting requirements, ensuring the security of the project sites, providing our services to the Principal Contractor, Health and Safety and defending against potential legal claims).
- **To protect your vital interests** (for example, if you suffer a serious or life-threatening injury on site and the Principal Contractors need to use your next-of-kin details).

Possible Lawful Bases for Processing Special Category Personal Data

- **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, after which, a PIN code or alternative method of site access will be arranged for you)
- **To protect your vital interests** (for example, if you suffer a serious or life-threatening injury and the Principal Contractors need to use your next-of-kin details).
- **For employment, social security and social protection law obligations** (for example, to ensure that you are legally allowed to work in the country).
- **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)
- **Health and safety / public health purposes** (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).

It remains the responsibility of the Principal Contractor to record and justify any lawful bases relied on.

7. 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, please email DPO@msite.com.

8. Personal Data Retention

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.

9. Your Data Protection Rights

Under the EU GDPR, you have the following rights with respect of your Personal Data:

- Right to Access.
- Right to Rectification.
- Right to Erasure.
- Right to Portability.
- Right to Object to Automated Decision-Making.
- Right to Restrict processing of your Personal Data
- Right to Object to Processing.
- Right to Lodge a Complaint.

If you are an individual who has submitted data request to a Principal Contractor through our Platform and would like to exercise one of the above-listed privacy rights, please contact that Principal Contractor directly.

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.

10. Contact 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 or write to us: The Bunker, 25 Innovation Boulevard, Liverpool, England, L7 9PW.

You can complain about how your personal data has been issuing by contacting your relevant supervisory data protection authority.

11. EU Representative

Where MSite provides services to controllers established in the EEA or to data subjects located in the EEA, and MSite itself is established outside the EEA, MSite has appointed an EU Representative to act as a contact point for supervisory authorities and data subjects on all issues related to processing of personal data under the EU GDPR.

The same appointment is applicable in relation to the Digital Services Act, for customers and users to report illegal content if any is found.

Data Protection Representative Limited (trading as DataRep)

77 Camden Street Lower, Dublin, D02 XE80

Registered in Ireland (number 616588)

People and supervisory authorities in the EU may contact the EU Representative in addition to, or instead of, MSite directly regarding all matters concerning processing, exercising of rights, or compliance with the EU GDPR.

If you want to raise a question to MSite, or otherwise exercise your rights in respect of your personal data, you may do so by:

- Sending an email to DataRep at msite@datarep.com.
- Contacting DataRep on their online webform at www.datarep.com/data-request, or
- Mailing your enquiry to DataRep at the most convenient of the addresses below.

Country	Address
Austria	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
Belgium	DataRep, Rue des Colonies 11, Brussels, 1000
Bulgaria	DataRep, 132 Mimi Balkanska Str., Sofia, 1540, Bulgaria
Croatia	DataRep, Ground & 9th Floor, Hoto Tower, Savska cesta 32, Zagreb, 10000, Croatia
Cyprus	DataRep, Victory House, 205 Archbishop Makarios Avenue, Limassol, 3030, Cyprus
Czech Republic	DataRep, Platan Office, 28. Října 205/45, Floor 3&4, Ostrava, 70200, Czech Republic
Denmark	DataRep, Lautruphøj 1-3, Ballerup, 2750, Denmark
Estonia	DataRep, 2 nd Floor, Tornimäe 5, Tallinn, 10145, Estonia
Finland	DataRep, Luna House, 5.krs, Mannerheimintie 12 B, Helsinki, 00100, Finland
France	DataRep, 72 rue de Lessard, Rouen, 76100, France
Germany	DataRep, 3rd and 4th floor, Altmarkt 10 B/D, Dresden, 01067, Germany

Greece	DataRep, Ippodamias Sq. 8, 4th floor, Piraeus, Attica, Greece
Hungary	DataRep, President Centre, Kálmán Imre utca 1, Budapest, 1054, Hungary
Iceland	DataRep, Laugavegur 13, 101 Reykjavik, Iceland
Ireland	DataRep, The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland
Italy	DataRep, Viale Giorgio Ribotta 11, Piano 1, Rome, Lazio, 00144, Italy
Latvia	DataRep, 4th & 5th floors, 14 Terbatas Street, Riga, LV-1011, Latvia
Liechtenstein	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
Lithuania	DataRep, 44A Gedimino Avenue, 01110 Vilnius, Lithuania
Luxembourg	DataRep, BPM 335368, Banzelt 4 A, 6921, Roodt-sur-Syre, Luxembourg
Malta	DataRep, Tower Business Centre, 2nd floor, Tower Street, Swatar, BKR4013, Malta
Netherlands	DataRep, Cuserstraat 93, Floor 2 and 3, Amsterdam, 1081 CN, Netherlands
Norway	DataRep, C.J. Hambros Plass 2c, Oslo, 0164, Norway
Poland	DataRep, Budynek Fronton ul Kamienna 21, Krakow, 31-403, Poland
Portugal	DataRep, Torre de Monsanto, Rua Afonso Praça 30, 7th floor, Algès, Lisbon, 1495-061, Portugal
Romania	DataRep, 15 Piața Charles de Gaulle, nr. 1-T, București, Sectorul 1, 011857, Romania
Slovakia	DataRep, Apollo Business Centre II, Block E / 9th floor, 4D Prievozska, Bratislava, 821 09, Slovakia
Slovenia	DataRep, Trg. Republike 3, Floor 3, Ljubljana, 1000, Slovenia
Spain	DataRep, Calle de Manzanares 4, Madrid, 28005, Spain
Sweden	DataRep, S:t Johannesgatan 2, 4th floor, Malmo, SE - 211 46, Sweden

Please note that when mailing enquiries, you must mark your letters with “DataRep” and not “MSite”, or your message might not reach us. Please refer clearly to MSite in your correspondence.

For more information about how DataRep will handle your personal data to undertake their services, please read their privacy notice at www.datarep.com/privacy-policy.

12. Changes to This Privacy Policy

We may update to this Policy from time to time. We will notify you if we make material changes.

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