ISG is a global construction specialist, delivering places where people and businesses thrive.

Data protection

This is an extract of page four of ISG's 'Code of ethics and business conduct - August 2021'. (<u>Click here</u> to view the full copy of the code)

The General Data Protection Regulation (GDPR), the UK Data Protection Act 2018, along with other data protection legislation in all the countries we operate in will guide how we collect, handle and store personal information at ISG.

Data protection legislation applies regardless of whether data is stored electronically, on paper or on other materials. Personal information must be collected and used fairly, stored safely and cannot be disclosed unlawfully.

Data protection legislation is designed to improve the privacy rights of individuals in relation to the information that organisations store about them.

ISG is committed to complying with relevant data protection legislation in every country we operate in.

Data protection law

Most data protection legislation is underpinned by the following six important principles, whereby personal data must be:

- processed fairly and lawfully and in a transparent manner in relation to individuals
- obtained only for specific, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

- accurate and kept up to date
- held for no longer than necessary
- processed in a manner that ensures appropriate security of the personal data

How will ISG ensure compliance?

At ISG, we have undertaken, or are currently in the process of undertaking, a variety of tasks to ensure that we comply. These include:

- the updating of data protection policies and procedures
- auditing existing processes to better understand how we use personal data, where it is stored, how secure it is, who has access to it and what processes are used to send such data both internally and to third parties externally
- the development of system changes / data cleansing
- the roll-out of suitable training for our employees, contractors and freelancers

Data protection officer

To help ISG comply with data protection legislation we have appointed a data protection officer (DPO) and a privacy team to protect the rights of individuals and support adoption of best privacy practice within ISG and its supply chain. The DPO sits on the Risk Committee, the Data Governance Committee and the ISG Business Change Board to ensure data protection is highly visible within the company. An external data protection consultancy provides specialist advice about ongoing data protection issues and helps ISG mitigate its data protection risks. The DPO reports directly to ISG's chief financial officer.

Paul Cossell Chief Executive Officer August 2021

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