

# PRIVACY NOTICE

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## Protection of your personal data

Cimenteries CBR Cementbedrijven (“we”, “Company”) and our Group (HeidelbergCement AG) take the protection of your personal data seriously. We are committed to process your personal data held by us in accordance with the applicable legislation and regulations for the protection of personal data.

Personal data are any information on an identified or identifiable individual, such as for example your name, address, telephone number, email address, online identifier.

## Purpose of this privacy notice

This document describes i) the types of information we collect about you; ii) where we collect the information from; iii) how we use the information we collect about you, iv) how long we keep your information for, v) to whom we may disclose it; and vi) your rights in relation to the processing of your personal data.

This privacy notice applies to any personal data we collect about you when you:

- *are a client, supplier, vendor, other business or professional stakeholder*  
You purchase goods or services from us; you provide services or goods to us (where, for example, you are a sole trader, partnership or where you are providing services or goods on behalf of your employer/contractor);
- *receive our newsletters and other promotional or marketing information;*
- *apply for one of our job vacancies;*
- *visit one of our sites or premises;*
- *call or being called by our customers service center;*
- *use any of our websites; or*
- *use any of our applications.*

If you have any questions, comments or requests regarding this privacy notice, please contact us at [DPC-Bene@heidelbergcement.com](mailto:DPC-Bene@heidelbergcement.com).

## Who is the data controller?

For the purpose of this privacy notice, the data controller is S.A. Cimenteries CBR Cementbedrijven N.V., with registered offices at Boulevard de France 3-5, 1420 Braine l’Alleud, Belgium, and company registration number 0400.465.290.

## If you are a client, supplier, vendor, other business or professional stakeholder

We process personal data about the contact persons of our clients, suppliers, vendors, other business or professional stakeholders (e.g. architects, entrepreneurs).

### Types of personal data collected

We collect the following information:

- **Identification data**  
Name and last name, signature, civil status (for salutation) of the contact persons of our clients, suppliers, vendors, other business or professional stakeholders (e.g. architects, entrepreneurs);
- **Contact data**  
Telephone number, email and (physical when relevant) address and language of these contact persons;
- **Financial data**  
Banking data, cost center required for invoicing or payments, credit status;
- **Other business details**  
Such as business title or professional role;
- **Business area of interest**  
HeidelbergCement products and services previously purchased or within the individual's area of interest; and
- **Opinions** about our products and services (e.g. clients' surveys) to improve our customers' services and relationships.

### Sources of the personal data collected

We collect your personal data when as an individual you:

- buy goods or services from us;
- provide goods or services to us;
- are designated by your employer as our contact for the purpose of submitting proposals, managing clients' assignments, invoicing, or (for companies providing services to us) for managing the service relationship and paying invoices;
- complete our registration form or other submission form, or request to be placed on our mailing list; or
- otherwise provide us or any of our employee with your contact details or other personal data.

Personal data may also be obtained from published sources (e.g. Belgian Official Gazette (*Moniteur belge/Belgisch Staatsblad*) to confirm for example signatory powers, social media) and from our affiliated companies.

## Purposes of the personal data collected

We process these personal data to what is relevant for supplying or informing you about our products or services or otherwise conducting business with you (e.g. buying goods or services from our suppliers).

We process your personal data to:

- **provide our clients with our products or services**  
To complete and fulfil orders, purchases, to process payments, to deliver your orders, to communicate regarding your purchases and provide you with related customer services;
- **inform clients, potential clients and business leads about our new products, services or events**  
Such as updates, announcements on our new products, promotions, to send you invitations to our events;
- **select our suppliers (tender process), to instruct our suppliers and services providers and compensate them for their services**
- **correspond with our business or professional contacts (e.g. entrepreneurs, architects, professional federations)**
- **respond to the inquiries and fulfil requests of our clients, business or professional contacts**  
Such as for example by sending newsletters, providing targeted information on our products or services
- **send administrative information**  
Such as for example regarding changes to our terms and conditions or policies
- **to participate to our surveys, promotions, contests and to administer these activities for other business purposes**  
Such as for example analyzing and managing our businesses, market research audits, developing new products, improving our services and products, determining the effectiveness of our promotional campaigns, gauging customer satisfaction and providing customer services;
- **as we believe necessary or appropriate:**  
To comply with our legal obligations (e.g. to comply with economic and trade sanctions), to monitor credit status, to respond to requests from public and government authorities, to enforce our terms and conditions, to protect our operations or those of any of our affiliates, to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others, and to allow us to pursue available remedies or limit the damages that we may sustain.

The above processing activities are necessary to (i) enter into a contract with you; (ii) perform a contract with you (to receive services or products from us or from you); (iii) to serve our legitimate business interests (e.g. by providing you with more information about our services and products, gauging customers' satisfaction, improving our products and services); or (iv) to comply with our legal obligations.

If you do not want to provide us with your personal data and they are necessary in order to (i) enter into a contract with you, (ii) perform a contract with you (iii) provide you with more information about our services and products or otherwise conduct business with you, or (iv) comply with our legal obligations, then we will not be able to enter into a contract with you, provide you the requested information, services or products, or receive from you the requested information, services or products, or conduct business with you.

## How long do we keep your personal data for?

We retain your personal information for the period necessary to fulfil the purposes mentioned above:

- as long as you remain a client, a services provider, a business or professional stakeholder; or
- as long as the statutory limitation period to initiate a claim or legal action; or
- for a longer retention period if it is required or permitted by law (e.g. health and safety legislation, in case of a litigation).

## If you receive our newsletters and other promotional or marketing information

If you are a client, a prospect or a business lead (e.g. architects, entrepreneurs), we use your personal data to provide you with a better customer experience or keep you informed about our products and services.

### Types of personal data collected

We collect the following types of information:

- **Your basic identification and contact details**  
Your first and last name, your company name, role/function, telephone number, email address, professional address, language.
- **Information about your customer relationship with us**  
We collect personal data when you purchase our products and services, such as your previous purchases, products preferences, information about our events you have participated in, and feedback you have given us.

### Sources of the personal data collected

We collect the information directly from you as you use our services or buy our products, or as you register to one of our events.

### Purposes of the personal data collected

We use your personal data to provide you with information about our products and services, our promotions and events that we believe may interest you. We provide you with our newsletters and promotional or marketing information by post or email.

If you are a client, we consider to have legitimate business interests to provide you with certain marketing information about our products and services, our promotions and events that we believe may interest you.

If you are a prospect or a business lead, we provide you with certain marketing information about our products and services, our promotions and events once we have obtained your consent (opt-in).

You can easily withdraw your consent or opt-out from our e-marketing messages by clicking the “unsubscribe” link at the bottom of each marketing email.

You can also unsubscribe (opt-out) from our newsletters sent by post by contacting us at [marketing@cbr.be](mailto:marketing@cbr.be).

You may change your personal preferences by clicking on the below link.

	Opt-in	Opt-out
<b>CBR NL</b>	<a href="https://www.cbr.be/nld/node/19615">https://www.cbr.be/nld/node/19615</a>	<a href="https://www.cbr.be/nld/node/19618">https://www.cbr.be/nld/node/19618</a>
<b>CBR FR</b>	<a href="https://www.cbr.be/fr/node/19616">https://www.cbr.be/fr/node/19616</a>	<a href="https://www.cbr.be/fr/node/19617">https://www.cbr.be/fr/node/19617</a>
<b>INTER-BETON NL</b>	<a href="https://www.interbeton.be/nl/node/19621">https://www.interbeton.be/nl/node/19621</a>	<a href="https://www.interbeton.be/nl/node/19623">https://www.interbeton.be/nl/node/19623</a>
<b>INTER-BETON FR</b>	<a href="https://www.interbeton.be/fr/node/19622">https://www.interbeton.be/fr/node/19622</a>	<a href="https://www.interbeton.be/fr/node/19624">https://www.interbeton.be/fr/node/19624</a>
<b>SAGREX NL</b>	<a href="https://www.sagrex.be/nl/node/19627">https://www.sagrex.be/nl/node/19627</a>	<a href="https://www.sagrex.be/nl/node/19629">https://www.sagrex.be/nl/node/19629</a>
<b>SAGREX FR</b>	<a href="https://www.sagrex.be/fr/node/19628">https://www.sagrex.be/fr/node/19628</a>	<a href="https://www.sagrex.be/fr/node/19630">https://www.sagrex.be/fr/node/19630</a>

### How long do we keep your personal data for?

We keep your personal data for providing you with our newsletters and other promotional or marketing purposes for as long as you want to receive this information from us. If you decide to opt-out of or withdraw your consent to our newsletters and other promotional or marketing information, we will no longer use your personal data for this purpose. We may however need to keep your personal data for another purpose (e.g. to carry out our customer relationship).

## If you are a job applicant

### Types of personal data collected

When you apply for one of our job vacancies, we process some personal data about you necessary to handle your application. This includes:

- Your name, address and contact details, including email address and telephone number;
- Details about your education or qualifications, (soft and hard) skills and personality, experience and employment history;
- Information about your current level of remuneration, including benefit entitlements;
- Copy of driving license for specific positions requiring such information (e.g. truck driver positions); and
- Information about your entitlement to work in Belgium.

### Sources of the personal data collected

We may collect this information in a variety of ways.

The personal data we process will be primarily provided to us directly by you through your job application, CV's or resume, or collected via interviews or other forms of assessment. In some cases, we may collect your personal data from other sources, such as references from previous employers, recruitment agencies, public authorities, schools, publicly accessible information source as internet or public social media profiles.

### Purposes of the personal data collected

We process your personal data:

- To take steps at your requests related to your job application, or to enter into a contract with you if you are a successful applicant;
- To comply with our legal obligations, e.g. to check a successful applicant's eligibility to work in Belgium, to comply with the economic and trade sanctions legislation;
- To process it based on our legitimate business interests, e.g. to assess and confirm a candidate's suitability for employment as well as keep record of it; to decide to whom to offer a job or to respond to and defend against legal claims; to monitor recruitment statistics: for example, effectiveness of our recruitment process; or
- When we have obtained your consent, i.e. when we retain a job application of an unsuccessful candidate who is nevertheless regarded as an interesting prospect for future employment opportunities, or when relevant to contact previous employers for reference checks.

If you do not want to provide us with your personal data to process your job application, we will not be able to i) process your application; to ii) enter into a contract for successful job applicants; iii) to comply with our legal obligations; or iv) serve our legitimate business interests.

### How long do we keep your personal data for?

If your job application is unsuccessful, we will hold your personal data on file for 3 months after the end of the recruitment process to be able to defend against legal claims.

We will also ask you whether you agree to allow us to keep your personal data on file for further employment opportunities. In such a case, we will hold your data for such purpose for a period of 12 months after the end of the recruitment process.

At the end of that period or if you withdraw your consent for other employment opportunities, your personal data will be deleted.

If your job application is successful, personal data gathered during the recruitment process will be transferred to your human resources file (electronic and paper based) and retained during your employment. The periods for which your data will be held will be provided to you in another privacy notice (for staff).

## If you visit one of our sites or premises

### Types of personal data collected

#### CCTV and other image capturing/recording devices

CCTV and other image capturing/recording devices are used across our sites and premises. Therefore, your image may be captured when you visit one of our sites or premises. The CCTV and other image capturing/recording devices are indicated by a pictogram or symbol at the various entrances of the sites and premises.

#### Reception desk

At the reception desk in our premises, we collect first name, last name, company name, car number plate, time in and out, host name, signature and date of the visit of our visitors.

#### Companies' workers or contractors accessing to our sites to perform work

We also collect personal data of the companies' workers or contractors working on our sites: first name and last name, company he/she works for, role or function, telephone number, department or site to access.

### Purposes of the personal data collected

The personal data are collected for the following purposes:

- To perform our contractual obligations with our services providers and contractors;
- To ensure compliance with our legal obligations (e.g. health and safety legal obligations) (e.g. intervene in case of work accidents or accidents of third parties on sites or premises, manage and investigate such accidents, report such accidents to insurance companies and other relevant third parties) towards our staff, contractors, services providers and visitors accessing our sites and premises;
- To serve our legitimate business interests to ensure the security of our sites and premises, and to control the production process on our machines.

### Specific security measures

The images captured on CCTV and other image capturing/recording devices are safely secured against manipulation and other forms of unlawful processing. Only a very limited number of persons have access to those images.

### How long do we keep your personal data for?

We keep your personal data as long as necessary for the purposes mentioned above. In particular, images captured on CCTV and other image capturing/recording devices are kept for maximum 4 weeks from the visit, unless we must keep them for a longer period of time (e.g. if the recorded images show potential criminal activity or incidents).

## If you call or being called by our customers service center (Order Intake & Dispatch Service) - Calls recording

Telephone calls into and out of our customers service center (i.e. Order Intake & Dispatch Service) are recorded in accordance with applicable laws to document commercial transactions (i.e. taking, monitoring and verifying your orders and deliveries as well as orders we place with our suppliers and contractors for pump and truck related services) and for the purposes of training and improving quality of our customers service center.

Order Intake and Dispatch Service recorded telephone lines and related emails are the following.

Business	Telephone line order intake	e-mail order intake
CBR Cement bulk	+ 3226799900	orders@cbr.be
CBR Cement packed	+3226799909	
CBR Ready-mix activity (Inter-Beton)	NL order intake : +3226799999 Stamix order intake : +3226799940 FR order intake : +3226799990	bestellingen@interbeton.be stamix@interbeton.be commandes@interbeton.be
CBR Aggregates activity (Sagrex)	+3226799950 (NL) +3226799953 (FR) +3226795055 (FR)	orders@sagrex.be

### Types of personal data collected

During the calls, we collect the following information:

- **about our customers** : first and last name, mobile or fix telephone number, address of offices, person of contact's details, employer's name, VAT number, product choices, place and time of delivery;
- **about our suppliers and contractors** : first and last name, mobile or fix telephone number, address of offices, person of contact's details, employer's name, VAT number.

We do not record any personal data that is not necessary to process and manage orders and deliveries from our customers or to process and manage orders placed to our suppliers or contractors for pump and truck related services. We do not record any sensitive personal data or critical personal data like financial details.

### Sources of the personal data collected

The personal data related to orders and deliveries are collected directly from you during the calls to our customers service center.

### Purposes of the personal data collected

We record telephone calls from (outgoing calls) or to (incoming calls) our Order Intake & Dispatch Service in compliance with applicable laws:

- to record our commercial transactions with our customers, suppliers and contractors; and
- for training of our staff at our customers service center and improving the quality of our customers service center.

For incoming calls to our Order Intake & Dispatch Service, a specific beep and information message are played at the beginning of the call informing participants to the call about the recording, its purposes and how they can consult this privacy notice. A customer, supplier or contractor can also contact our Order Intake & Dispatch Service via email (see above table).

### Specific security measures

The call recordings are only accessible on a need to know basis for the purposes of i) recording and processing orders and deliveries, as well as managing the accounts with our customers, suppliers and contractors; and ii)



for training of our staff at our customers service center and the improvement of the quality of our customers service center. The servers are located within the European Economic Area and accesses to the recordings are monitored via a security log.

### **How long do we keep your personal data for?**

For the purpose of recording commercial transactions, call recordings are retained as long as commercial transactions can be challenged in court (i.e. 10 years for the liability set by the Belgian Civil Code), unless required or permitted to be kept longer (e.g. in case of a litigation, investigation). Call recordings are no longer used for training purposes 1 month after the recording is made.

### **If you visit one of our websites**

When you visit one of our websites cbr.be; interbeton.be; stamix.be; sagrex.be; heidelbergcement.be; carrièrebossimé.be (“Websites”), the personal data that we collect falls into two categories: i) personal information you voluntarily provide to us; and ii) personal information collected by automated means such as cookies.

### **Personal information voluntarily provided by you when visiting one of our Websites**

We automatically collect and store information transmitted to us by your browser in its server log files. This includes :

- browser type/version
- operating system used
- referrer URL (the previously visited site)
- host name of the computer accessing the site (IP address)
- time of the server request

We cannot attribute these data to specific individuals. These data are not amalgamated with other data sources. Furthermore, the data are deleted after statistical analysis. Additional personal details such as your name, address, telephone number or e-mail address are not collected unless these details are volunteered by you, e.g. as part of a registration, survey, competition, execution of an agreement or request for information.

### **Personal information collected by automated means such as cookies**

Some of the webpages use so-called cookies. Their purpose is to make our Internet presence more user-friendly, more effective and more secure. Cookies are small text files that are filed on your computer and stored by your browser. Most of the cookies we use are 'session cookies'. They are automatically deleted at the end of your visit. Cookies do not harm your computer and do not contain viruses. If you do not want cookies to be stored on your hard disk, you can adjust your browser's settings accordingly.

### **Personal information collected by Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. In case of activation of the IP anonymization, Google will truncate/anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. On behalf of the website provider Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage to the website provider. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this website.

Furthermore, you can prevent Google’s collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

You can refuse the use of Google Analytics by using the following switch. An opt-out cookie will be set on the computer, which prevents the future collection of your data when visiting this website.

OnOffx

Current status: Your data will be tracked

*(Click on one of the links below and go to section “ If you visit our website” to modify your current status)*

ACTIVITY	LINK
<b>Cement (NL)</b>	<a href="https://www.cbr.be/nld/node/19515">https://www.cbr.be/nld/node/19515</a>
<b>Cement (FR)</b>	<a href="https://www.cbr.be/fr/node/19516">https://www.cbr.be/fr/node/19516</a>
<b>RMC (NL)</b>	<a href="https://www.interbeton.be/nl/node/1951">https://www.interbeton.be/nl/node/1951</a>
<b>RMC (FR)</b>	<a href="https://www.interbeton.be/fr/node/19519">https://www.interbeton.be/fr/node/19519</a>
<b>Aggregates (NL)</b>	<a href="https://www.sagrex.be/nl/node/19521">https://www.sagrex.be/nl/node/19521</a>
<b>Aggregates (FR)</b>	<a href="https://www.sagrex.be/fr/node/19522">https://www.sagrex.be/fr/node/19522</a>

Further information concerning the terms and conditions of use and data privacy can be found at <http://www.google.com/analytics/terms/gb.html> or at [https://www.google.de/intl/en\\_uk/policies/](https://www.google.de/intl/en_uk/policies/). Please note that on this website, Google Analytics code is supplemented by “anonymizeIp” to ensure an anonymized collection of IP addresses (so called IP-masking).

## If you use one of our applications

We collect personal information about you when you use our application Track & Trace.

The purpose of our application of Track and Trace is to allow our customers to monitor their orders and deliveries.

### Types of personal data collected

In order for you to be able to use our application Track & Trace, we need to collect the following personal data about you: your name and last name, mobile telephone number, email address and the company name you work for.

### Sources of the personal data collected

This information comes from you when you register yourself to the application or from our customers service center when you ask your account manager to create the registration for you.

### Purposes of the personal data collected

We collect this information for the following purposes:

- To be able to create the user’s account who would like register to our Track and Trace application to track his/her orders and deliveries; and
- To be able to verify the user’s account as one of our customers.

### How long do we keep your personal data for?

The personal data is kept for as long as the user is actively using the application. The customer data is updated when you communicate any changes to your account manager or sales administrator contact.

## How we may disclose your personal data?

To the extent permissible by applicable laws and in line with this privacy notice, we may disclose your personal data:

- within the HeidelbergCement Group or to other affiliated companies, for purposes consistent with this privacy notice. We take precautions to limit the access to your personal data only to those staff members who have a legitimate business need to access it in accordance with the privacy notice;
- to our third-party services providers such as payment or invoicing processing, IT services, website hosting, order fulfilment, infrastructure provision, security, auditing services and other services, to enable them to provide their services;
- to any competent law enforcement body, regulatory, government agency, court or other third party, such as without being limited to, the police authorities, the tax authorities, the social security authorities, when such transfer is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, (iii) to protect your vital interests or the ones of any other individual, or (iv) based on a court order;
- to our auditors, advisors, legal representatives and similar agents in connection with advisory services they provide to us for legitimate purposes and in accordance for the purposes described in this privacy notice.
- In the event that we, or any portion of our assets, are acquired, we may share all types of personal data with the acquiring company.

## How do we protect your personal data?

We take technical and organizational measures to adequately protect your personal data and to maintain its quality. We make improvements to this protection on an ongoing basis in line with technical progress. We use a range of physical, electronic and managerial measures to ensure that we keep your personal data secure.

## International personal data transfer

We do not transfer your personal data to third parties outside the EEA (European Economic Area) other than within the HeidelbergCement Group or other affiliated companies (see above section on How we may disclose your personal data?), except in the following cases:

- You have explicitly consented to the transfer;
- The transfer is necessary for the performance of a contract between you and us or the implementation of pre-contractual measures taken at your request;
- The transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and another natural or legal person;
- The transfer is necessary for important reasons of public interests;
- The transfer is necessary for the establishment, exercise or defense of legal claims;
- The transfer is necessary in order to protect your vital interest or of other persons, where the data subject is physically or legally incapable of giving consent;
- When using standard EU model clauses; or
- When authorized by the data protection authority.

## How can you exercise your rights?

You have a number of rights under the applicable data protection laws.

- You have the right to be informed about how we process your personal data. This is the purpose of this privacy notice;
- You have the right to access your personal data, review your personal data and ask to be corrected or updated;
- You have the right to ask us to delete your personal data, to object or restrict its processing, or to ask their portability;
- You have the right not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you;
- You have the right to withdraw your consent at any time, where we rely on it to use your personal data (for example, to provide you (as a prospect or business lead) with certain marketing information about our services or goods).

The above rights may be subject to some legal conditions. To exercise any of your above rights, or if you have any questions on this privacy notice, please write to us at this email address:

[DPC-Bene@heidelbergcement.com](mailto:DPC-Bene@heidelbergcement.com).

We will take all reasonable steps to respond to your request in accordance with applicable data protection laws. When you exercise any of the above rights, we will ask you to provide us with a copy of a valid identification document (e.g. your ID card ) in order to authenticate you.

You may also use the above contact details if you have any concern or wish to make a complaint to us relating to how we process your personal data.

You have also the right to complaint to your local data protection authority in your jurisdiction.

## Update to this privacy notice

We may update this privacy notice from time to time. To let you know when we make changes to this privacy notice, we will amend the revision date at the top of the page. The new modified or amended privacy notice will apply from the revision date. Therefore, we encourage you to periodically review this privacy notice to be informed about how we are protection your personal data.

## Link to other websites

Our Websites may contain hyperlinks to websites owned and operated by other entities of HeidelbergCement Group or third parties. They are not provided by us. Such websites, as well as other websites that may be linked to our Websites, are not governed by this privacy notice. They have their own privacy notice. We therefore encourage visitors to review such privacy notices on each of these other websites before disclosing any of personal data. We practices of third-party websites and your use of such websites is at your own risk.

## Whom to contact?

If you have any questions, comments or requests, please contact us at [DPC-Bene@heidelbergcement.com](mailto:DPC-Bene@heidelbergcement.com).