

## Introduction

This Privacy Notice applies to the Personal Data that Data Transfer Solutions (DTS), makers of the VUEWorks® family of applications (“app” or “apps”), may generally collect, process and store about you. DTS is a member of the SNC-Lavalin Group (referred to throughout as SNC-Lavalin).

By providing your Personal Data within this app, you expressly acknowledge that you have read and understood this Privacy Notice.

Your organization may have separate policies reflecting the extent to which they have configured the app. This Privacy Notice only covers the Personal Data that SNC-Lavalin may have access to which will vary depending upon the configuration chosen by your organization.

This Privacy Notice is published within VUEWorks® apps to ensure it is readily available to all individuals at any point. SNC-Lavalin reserves the right to amend the Privacy Notice from time to time where reasonable to ensure it continues to accurately reflect the way in which we process Personal Data. Any updates or changes to the Privacy Notice will be highlighted at the end of this document.

The privacy and security of the Personal Data collected from you is a priority to SNC-Lavalin. It is also important to us that you understand how we handle this data.

This policy sets out the basis on which any Personal Data we collect from you, or that you provide to us, will be processed by us.

## Information we may collect from you, and use we may make of it

We may collect and process various types of Personal Data, which is any data that could identify you, while using our app. Examples of Personal Data we may collect from you include, but is not limited to:

- First Name and Surname
- Your Organisation details
- Email address
- Telephone number
- Your location
- IP address, server URL or similar internet identifier
- Your device functionality (including operating system, hardware, mobile or local network information)
- The areas within our app that you visit and your activities there, including remembering you and your preferences, and
- Certain other device data, including the time of day among other information

The exact Personal Data SNC-Lavalin has access to will be dependent upon the configuration chosen by your organization. We will hold and process any Personal Data which you provide via the app for purposes relating to the services which the app is intended to facilitate, e.g., to understand the condition of assets etc, including:

- to provide the services;
- to enable you to participate in or use the services’ features;
- to improve the services or our offerings;
- to provide customer support;
- to contact you with regard to your use of the services and changes to the services and/or app’ policies;
- to provide you with special offers or promotional and marketing materials;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- for other internal purposes in connection with our business or the services; and
- for purposes disclosed at the time you provide Personal Data or as otherwise set forth in this Privacy Notice.

## Disclosure of your information

We do not pass on or sell Personal Data to third parties other than as described below. We may share information within our organization and in some cases, it will be necessary to pass information to our technical teams to resolve issues or for other reasons such as understanding app usage. This may comprise our employees, agents, contractors and sub-contractors. Please note that by using a VUEWorks® app you consent to us processing and transferring your Personal Data in this way. Your organization may have separate policies for disclosure of your Personal Data.

We may use third party vendors, contractors, and other service providers to perform certain services on behalf of us or in connection with our apps, such as: (i) to assist us in operation of the app; (ii) to manage databases of customer information; (iii) hosting the services; (iv) designing and/or operating app features; (v) tracking app activities and analytics; (vi) enabling us to send special offers or perform other administrative services; and (vii) other services designed to assist us in maximizing our business potential.

We may also disclose Personal Data as follows:

We may access, use, preserve, transfer, and disclose Personal Data to third parties: (i) to satisfy any applicable law, regulation, subpoenas, governmental requests or legal process if in our good faith opinion such is required or permitted by law; (ii) to protect and/or defend our Terms of Use or other policies applicable to the app, including investigation of potential violations thereof; (iii) to protect the safety, rights, property or security of the app or any third party; and/or (iv) to detect, prevent or otherwise address fraud, security or technical issues. Such disclosures may be carried out without notice to you.

We may share Personal Data with any parent, subsidiaries and affiliates. We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the business or the app; or (ii) in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other corporate change in which Personal Data held by us about our users is among the assets transferred, and you agree to and do hereby consent to our assignment or transfer of rights to your Personal Data.

## Cookies and Other Tracking Technology

We use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your device, tell us how and when you visit and use our app, analyze trends, learn about our user base and operate and improve our app. Cookies are small pieces of data-usually text files-placed on your computer, tablet, phone or similar device when you use that device to access our app. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the app does not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- **Required Cookies.** Required Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our app. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies.** Functional Cookies are used to record your choices and settings regarding our app, maintain your preferences over time and recognize you when you return to our app. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies.** Performance/Analytical Cookies allow us to understand how visitors use our app. They do this by collecting information about the number of visitors to the app, what pages visitors view on our app and how long visitors are viewing pages on the app.

Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the app’s content for those who engage with our advertising.

- Google Inc. (“Google”) uses cookies in connection with its Google Analytics and DoubleClick services. Google’s ability to use and share information collected by Google Analytics and DoubleClick about your visits to the app is subject to the Google Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at <https://policies.google.com/technologies/ads> or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the app and functionalities may not work.

To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

## How long is your Personal Data retained for?

The retention period of your Personal Data may be determined by the organization utilizing the app.

SNC-Lavalin may retain appropriate records of Personal Data for regulatory, legal and contract administration purposes. We only keep Personal Data for as long as necessary for the purpose or purposes it was collected for. Records are retained for a period that may extend beyond a contract with SNC-Lavalin in some circumstances. Personal Data is retained to comply with other legal and contractual obligations and requirements such as local government reporting requirements. Where required, further information concerning our approach to records retention can be obtained from the Data Protection Officer whose details are below.

## Children’s Information

The app is offered and available only to users who are 18 years of age or older. We do not solicit, collect, or maintain information from people we actually know are under 18 years old. If we obtain actual knowledge that a user is under 18 years old, we will use our best efforts to promptly remove that person’s information from our database. If you are not 18 years of age or older, you must not access or use the app.

## Where we store your Personal Data

The Personal Data you provide may be stored according to your organization’s configuration.

Where SNC-Lavalin has access to data, the data that we collect from you may be transferred to, and stored at, a destination outside the US. It may also be processed by staff operating outside the US who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

All information SNC-Lavalin has access to is stored on our secure servers.

Unfortunately, the transmission of information is never completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted via our app; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## How is your Personal Data kept secure?

Your personal data may be stored according to your organization’s configuration of the service. Where SNC-Lavalin has access to the Personal Data, we have implemented appropriate security measures to protect the confidentiality, integrity and availability of Personal Data. We employ organisational and technical security measures, including password protection, encryption, physical locks, etc., to protect Personal Data and to ensure it is processed appropriately, consistently and in accordance with applicable data privacy laws and regulations. Where we have given you (or where you have chosen) a password which enables you to access

certain parts of our app, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

If you are authorized to have access to the Personal Data of others, it is important that you take appropriate safeguards to protect this Personal Data.

## International transfers of Personal Data

We may transfer Personal Data, for the processing purposes outlined in this Privacy Notice, to any other companies within SNC-Lavalin or to Third Parties who process data on our behalf under our instruction. SNC-Lavalin and relevant Data Processors may operate globally across Europe, the Middle East, Asia Pacific, North America and Africa and may also set up establishments in other regions. We therefore reserve the right to transfer and process Personal Data on a global and worldwide basis in line with our legal, regulatory and contractual obligations.

## Third Party Web Sites

We may provide hyperlinks from the app to websites or apps of third parties. Please note that this Privacy Notice applies only to the contents of this app and not to those websites to which we may provide a link. If you are directed to the DTS or VUEWorks® website, then the website Privacy Notice will apply.

## How to contact us to update your Personal Data or any queries you might have

Depending on the configuration chosen by your organization, you may be able to update your Personal Data. If you have a query regarding SNC-Lavalin's access to your Personal Data, you may contact us via [this website](#), or via email to the Data Protection Officer whose contact details are below.

## Notice to California Residents

If you are a California resident, the following provisions prevail over any conflicting provisions in other sections of this Privacy Notice.

### California Do Not Track

California Business & Professions Code Section 22575(b) (as amended effective January 1, 2014) provides that California residents are entitled to know how we respond to "Do Not Track" browser settings. However, we do not currently take actions to respond to Do Not Track signals because a uniform technological standard has not yet been developed.

### Shine the Light

Under California Civil Code sections 1798.83-1798.84, also known as the "Shine the Light Law," any of our users who are California residents are entitled to request and receive once a year, free of charge, a notice from us describing what categories of personal customer information (if any) we shared with third parties or corporate affiliates for their direct marketing purposes during the preceding calendar year. If applicable, the notice will identify the categories of information shared, the names and addresses of the third parties and affiliates with which information was shared. If you are a California resident and would like to request a copy of this notice, please submit a written request to the contact listed below. Please allow at least thirty days for a response.

In addition to the rights above, California residents have certain rights under the California Consumer Privacy Act ("CCPA"). Please see below for our CCPA Privacy Notice:

If you are a California resident, you have certain rights related to your Personal Data, including:

- The right to request that we disclose to you:
  - the specific pieces of Personal Data we have collected;
  - the categories of Personal Data we have collected about you;
  - the categories of sources from which the Personal Data is collected;
  - our business or commercial purpose for collecting or selling Personal Data;

- the categories of third parties with whom we share Personal Data; and
- a list of the categories of Personal Data, such as name, address, e-mail address, and the type of services provided to the customer, that we have disclosed to third parties (including independent affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties' direct marketing purposes.
- The right to request that we delete the Personal Data we hold about you, unless the Personal Data is necessary for the us or our service providers to:
  - complete a transaction for which the Personal Data was collected, provide a good or service requested by the individual or otherwise perform a contract between us and the consumer;
  - detect security incidents;
  - protect against malicious, deceptive, fraudulent or illegal activity (or prosecute those responsible);
  - debug to identify and repair functionality errors;
  - exercise or ensure the right of another to exercise free speech or another legal right;
  - comply with the California Electronic Communications Privacy Act, which compels the production of or access to electronic communication information or electronic device information with a search warrant;
  - engage in research in the public interest (if the consumer has provided informed consent);
  - to enable solely internal uses aligned with the consumer's expectations given their relationship with us;
  - comply with a legal obligation;
  - otherwise use the information internally in a lawful manner compatible with the context in which the consumer provided it.
- The right to opt-out of the sale of your Personal Data. We do not sell and, within the last 12 months, we have not sold Personal Data.

If you have a query regarding your Personal Data, you may contact us via [this website](#), or via [email to the Data Protection Officer](#) whose contact details are below.

We may limit our response to your rights request as permitted under applicable law. The right to disclosure and right to deletion are not absolute and are subject to certain exceptions. For instance, we cannot disclose specific pieces of Personal Data if the disclosure would create a substantial, articulable, and unreasonable risk to the security of the Personal Data, your account with us or the security of the business's systems of networks.

As required under California law, please note that we will take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We cannot effectuate your request if we are unable to verify your identity or authority to make the request and confirm that the personal information relates to you. We may require you to provide your email address to verify your identity in response to exercising requests of the above type. You will, therefore, need access to your email account to receive our communications necessary to process your request. Please make sure to check your spam inbox to ensure these important communications are not missed. We will not use any Personal Data provided to us for verification purposes for any reason other than to verify your identity.

Under California law, you may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf. We will require the agent to provide proof of that written permission. As permitted by law, we may require you to verify your own identity in response to a request, even if you choose to use an agent.

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

We may not discriminate against you because of your exercise of any of the above rights or any other rights, subject to the rights and the obligations under the CCPA, including by:

- Denying you goods or services;
- Charging different prices or rates for goods or services, including through the use of discounts, loyalty program, or other benefits or imposing penalties;
- Providing you a different level or quality of goods or services; or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

- However, we may offer you certain financial incentives permitted by law that can result in different prices, rates, or quality levels. Any permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

You may contact us with questions and concerns about our privacy policies or practices by contacting us using any of the methods listed in the "Contact Us" Section.

## Contact Us

Please contact the Data Protection Officer who can be contacted at:

Data Protection Officer  
Data Privacy Compliance Team  
SNC-Lavalin  
500 Park Ave  
Almondsbury  
Bristol  
BS32 4RZ  
email: [datacompliance@snclavalin.com](mailto:datacompliance@snclavalin.com)

## What changes have been made to this Privacy Notice?

Any changes to this Privacy Notice will be documented below.

Version 1	DTS (SNC-Lavalin) Privacy Notice created December 2020
US Version	US Version created February 16, 2021