



GDPR POLICY

Statement:

TAIT is committed to protecting and respecting your privacy and we'll only use your personal information to administer your account and to provide the products and services you requested from us. By interacting with TAIT through our website, products and services, you consent to the use of information that is collected or submitted as described in this privacy policy. TAIT may change or add to this privacy policy, so we encourage you to review it periodically.

Summary:

Section	What can you find there?
What Information TAIT collects	TAIT collects information directly from you during your transaction. This may include contact details, business details, credit card details, etc. We only collect the minimum amount of personal information necessary from you, unless you choose to provide more.
How TAIT uses your information	In this section, we describe how TAIT uses your information, including to communicate with you and perform under the contract.
How we share the information we collect	We may share your information with third parties under one of the following circumstances: with your consent, with a service provider, to protect an individual's vital interests, to seek legal advice from external TAIT lawyers, advisors or auditors, to comply with our legal obligations, or with respect to a legal dispute. TAIT has business processes that cross country borders, and may share information amongst other TAIT Group Members. TAIT does not sell your personal information.
Our use of cookies and tracking	We use cookies to understand how our Web Users use our websites and services.
How TAIT secures your information	We take all measures reasonably necessary to protect the confidentiality, integrity, and availability of your personal information held by TAIT.
TAIT's global privacy practices	TAIT has taken steps to extend the GDPR level of data protection to all of our customers on a global basis when TAIT acts as a data processor of personal information.
How we communicate with you	We communicate with you by email and/or telephone. You can control the way we contact you by contacting us.
Resolving complaints	Please contact dataprivacy@tairtowers.com should you have a concern or complaint.
Contacting TAIT	Please feel free to contact us if you have questions about our Privacy Statement.

WHAT INFORMATION TAIT COLLECTS

TAIT has a diverse range of business interests and operations and so an equally diverse range of Customers, Suppliers and Web Users. Accordingly, the type of Business Information that TAIT processes depends on the particular business context and the purpose for which it was collected. It may include:

- contact details (such as the individual's name, job title, gender, work address, telephone numbers, email address, fax numbers and so on); details of an individual's relevant experience and/or academic and professional qualifications (such as where the individual is employed by a vendor);



- details of an individual's business and other interests and opinions (such as where information is held in a Customer Relationship Management database); and/or,
- information with respect to a Web User's use of the TAIT website, including the contents of web forms, contributions made to any discussion forums and browsing history, IP addresses, and their path through the TAIT website;
- Credit card details, credit worthiness, and other financial-related information, such as an individual's bank account number and other relevant payment-related information collected in support of business transactions.

If TAIT holds Business Information in more than one capacity (such as where an individual is a Customer, but also a Web User) then more than one of the purpose listed below may apply.

TAIT advises those between the ages of 13 and 18 that they should consult with their parents prior to providing Personal Information.

TAIT strongly disfavors the collection of Personal Information from children under the age of 13 ("**Minor Children**"), either directly or via a website which targets Minor Children or teenagers (or which is known to be frequented by Minor Children or teenagers). Any proposal to collect information from Minor Children must be approved in advance (following internal policies).

Note that it is acceptable to collect limited Personal Information from the Minor Child in order to seek parental consent (such as name and the contact information of his/her parents).

If collection of Personal Information of Minor Children is approved, the following additional requirements apply:

- Provide parental notice of TAIT practices;
- Obtain prior verifiable parental consent for the collection, use, and/or disclosure of Personal Information from Minor Children, and store this consent for auditing and verification purposes. For any TAIT websites which target Minor Children or which are known to be frequented by Minor Children parental consent must be obtained prior to collecting Personal Information or any personal identifier that permits the Minor Child to be contacted (such as a persistent identifier which permits sending instant messages to the Minor Child);
- Provide a parent, upon request, with the ability to review the Personal Information collected from his/her child;
- Provide a parent with the opportunity to prevent the further use of Personal Information about that child (e.g. a way to cancel membership);
- Limit collection of Personal Information for a child's online participation in a game, prize offer, or other activity to information that is reasonably necessary for that activity; and
- Establish and maintain reasonable procedures to protect the confidentiality, security, and integrity of the Personal Information collected.

HOW TAIT USES YOUR INFORMATION

Typically, TAIT's processing of Business Information is in connection with the following activities and business processes:

- (a) Negotiating, concluding and performing contracts with Customers (including the provision of financial services and advice).
- (b) Managing TAIT accounts and records.



- (c) Advertising, marketing and public relations (including direct marketing and personalised and targeted advertising).
- (d) Analyzing Web Users' use of TAIT websites, apps and related products and services.
- (e) Market research and competitor analysis.
- (f) Research and statistical analysis, including technological development.
- (g) Negotiating, concluding and performing contracts with Suppliers.
- (h) Communicating with individuals that are Customers, Suppliers, or Web Users.
- (i) Operating the TAIT website and apps.
- (j) Supporting TAIT's corporate social responsibility activities.
- (k) Legal and regulatory compliance, internal control evaluations (conducted by TAIT's internal and external audit service providers) and other internal investigations.
- (l) Debt administration.

Suppression Requests

An individual may, at any time, request that TAIT stop sending him/her direct marketing materials, even if he has previously consented to receive them.

Where an individual requests that TAIT not send any further direct marketing communication, it is not generally necessary to delete such an individual's information from TAIT's systems altogether. It is sufficient to "block" all outbound communications that would be covered by that individual's request. All third party marketing lists which are to be used by TAIT for direct marketing purposes must also be screened against the list of individuals who have opted-out.

In addition, TAIT shall screen its direct marketing lists against any recognized industry suppression lists that may be relevant (e.g. Do Not Call lists).

An individual's request may be specific to a particular media (e.g. "no phone calls" or "no emails") or general ("no marketing"). Any request from an individual for TAIT to stop direct marketing to that individual shall be forwarded to the appropriate TAIT Privacy Team (dataprivacy@taittowers.com) so that the individual's details and all relevant suppression files may be updated and his request complied with.

Obtaining Permission

An "opt-in" consent requires that an individual has given his or her prior, informed consent to receiving marketing communications before such communications are sent. Such consent is often obtained by requiring the individual to tick a box to indicate his consent, particularly when Business Information is collected online, although this is not the only way of obtaining consent. When considering consent it is useful to put yourself in the individual's position. Did the individual regard the action he has just taken – ticking a box, signing a form, clicking "send" etc. as indicating his consent?

An "opt-out" consent requires that an individual is offered a free and easy means of choosing not to receive marketing communications.



TAIT shall seek to obtain the consent of Customers to direct marketing in accordance with applicable laws and in a form that is consistent with the standard forms, website policies and other documentation that is accessible or received by individuals. Further details are available from dataprivacy@tairtowers.com.

Other Individuals Rights

Subject to applicable local law, an individual may also exercise rights to object to certain types of processing carried out by TAIT, to access and seek erasure of Business Information processed by TAIT. TAIT will deal with any requests in accordance with

HOW TAIT SHARES THE INFORMATION WE COLLECT

Cookies and Similar Technologies

TAIT and its partners may use a variety of cookies and other tracking technologies, including technologies provided by third parties (collectively “**Cookies**”) to understand how its Web Users use its websites and services and to deliver personalised advertising and content. TAIT will give notice to Web Users on its use of Cookies and will explain how to “opt-out” from TAIT’s use of Cookies.

Sharing Business Information Within TAIT

Like many large organizations, TAIT has business processes that cross country borders. In addition, many of its business units share resources, such as information technology. Accordingly, there are many situations within TAIT where one TAIT Group Member has a need to process Business Information originally collected by another TAIT Group Member (and vice-versa).

(a) Data Sharing between TAIT Companies as Data Controllers

A TAIT Group Member may share Business Information with another TAIT Group Member in the following circumstances:

- the Business Information shall be used and otherwise processed in a manner that is compatible with the purpose for which it was originally collected; and
- the Business Information shall only be made available within TAIT to appropriately authorized representatives who have a clear “need to know” in connection with their usual TAIT role, such as those in a managerial position (with responsibility for the Customers or Suppliers concerned).

(b) Data Sharing where one TAIT Group Member (a Data Processor) processes on behalf of another (a Data Controller)

This refers to a situation where one TAIT Group Member is providing a data processing service to another TAIT Group Member, such as centralized storage of data, application hosting, or managing a Customer Relations help-desk.

Where a TAIT Group Member (the Data Controller) uses another TAIT Group Member (the Data Processor) to process Business Information on its behalf that TAIT Group Member (the Data Controller) shall:

- use a TAIT Group Member providing sufficient guarantees or assurances with respect to the technical and organizational security measures governing the processing;
- instruct the TAIT Group Member (either generally or specifically) regarding how to process the Business Information and require that TAIT Group Member to comply with equivalent security and confidentiality obligations as the TAIT Group Member (Data Controller) is subject to (including those referred to in this Policy); and

- otherwise comply with the requirements of Part B, Section 6.

Where a TAIT Group Member (the Data Processor) processes Business Information on behalf of a TAIT Group Member (Data Controller), it shall:

- process Business Information in accordance with the instructions of the TAIT Group Member (Data Controller);
- apply and maintain appropriate technical and organizational measures to protect Business Information from unauthorized access and to avoid its accidental loss, damage or destruction, in particular, where the processing involves the transmission of data over a network as more particularly set out in TAIT's IT Policies; and
- otherwise comply with the requirements of Part B, Section 6.

Sharing Business Information with third party service providers

When considering engaging a third party service provider, TAIT shall have regard to the following:

- Due diligence. TAIT shall select a third party service provider providing sufficient guarantees with respect to data security and the handling of Business Information generally.
- Contractual obligations. TAIT shall ensure that its contract with the third party service provider includes specific data privacy obligations.
- Compliance monitoring. TAIT shall take reasonable steps to monitor the third party service provider's performance of the relevant security and processing obligations. In circumstances where the third party service provider acts as a data processor, TAIT will remain legally responsible for the third party service provider's processing of its Business Information.
- Transfers. If engaging a third party service provider will or may involve Business Information being processed outside Europe then additional data privacy clauses must be included in TAIT's contract with the third party service provider.

Disclosure of Business Information outside TAIT

TAIT shall not disclose Business Information outside TAIT except where it is necessary to do so:

- to engage a third party service provider;
- to protect an individual's vital interests;
- where required by law, regulation or court order to do so;
- in connection with a legitimate request for assistance by the police or other law enforcement agency;
- to seek legal advice from TAIT's external lawyers, as directed by TAIT's in-house counsel;
- with respect to a legal dispute or administrative claim between TAIT and a third party; to that third party and lawyers representing them;
- to engage professional advisers (e.g. bankers, lawyers, accountants, external auditors) and liaise with potential buyers and vendors in connection with the disposal or acquisition by TAIT of a company or a company's assets;
- to engage external auditors to validate TAIT's financial accounts.



In addition, where sharing involves or may in the future involve Business Information being transferred outside Europe, TAIT may only transfer such Business Information where one of the following conditions applies:

- the third party will process the Business Information in accordance with a European Commission decision finding that the country provides adequate protection (e.g. the laws of Argentina or Canada will apply to the data processing by the third party);
- the third party signs data privacy clauses that have been approved by a competent data protection authority;
- the individuals have been given an opportunity to object, after having been informed of the purposes of the transfer, the categories of recipients and the fact that the countries to which the data is being transferred may have different data privacy standards;
- if the transfer involves Sensitive Personal Information, the individuals have given their explicit consent to the transfer, where required; or the transfer is otherwise permitted under the European Data Protection Laws.