



Data Protection Policy

HUBER car park systems international GmbH designs and builds multi storey car parks. The personal data it processes to provide these services relate to its clients, staff, subcontractors and suppliers, as well as other individuals as necessary.

This policy sets out HUBER car park systems international GmbH's commitment to ensuring that any personal data processed is carried out in compliance with data protection law. HUBER further ensures that good data protection practice is imbedded in the culture of its staff and the organisation.

'Data Protection Law' includes the UK and EU General Data Protection Regulations; the UK Data Protection Act 2018 and all relevant EU and UK data protection legislation.

This policy applies to all personal data processed by HUBER car park systems international GmbH and is part of its approach to compliance with data protection law. Our employees are expected to comply with this policy and failure to comply may lead to disciplinary action for misconduct, including dismissal.

Data protection principles:

HUBER car park systems international GmbH complies with the data protection principles set out below. When processing personal data, we ensure that:

- It is processed lawfully, fairly and in a transparent manner;
- It is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- It is all adequate relevant and limited to what is necessary in relation to the purposes for which it is processed;
- It is all accurate and where necessary, kept up to date and that reasonable steps will be taken to ensure that inaccurate personal data is erased or rectified without delay;
- It is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;
- It is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

HUBER car park systems international GmbH will facilitate any request from a data subject who wishes to exercise their rights under data protection law without undue delay.

Procedures

HUBER car park systems international GmbH will:

- Ensure that the processing of personal data complies with the law;
- Not do anything with any data which would not be expected given the content of this policy and the fair processing or privacy notice;

- Ensure that appropriate privacy notices are in place advising employees and others how and why their data is being processed, and, in particular, advising data subjects of their rights;
- Only collect and process the personal data that it needs for purposes it has identified in advance;
- Ensure that, as far as possible, the personal data it holds is accurate, or a system is in place for ensuring that it is kept up to date as far as possible;
- Only hold onto personal data for as long as it is needed, after which time it will be deleted;
- Ensure that appropriate security measures are in place to ensure that personal data can only be accessed by those who need to access it and that it is held and transferred securely.

HUBER car park systems international GmbH will ensure that all employees who handle personal data on its behalf are aware of their responsibilities under this policy and other relevant data protection and information security policies, and that they are adequately trained and supervised.

Breaching this policy may result in disciplinary action for misconduct, including dismissal. Obtaining (including accessing) or disclosing personal data in breach of HUBER car park systems international GmbH's data protection policy may also be a criminal offence.

Data Subject Rights

HUBER car park systems international GmbH is aware that any individual can exercise their rights under data protection law and would facilitate any request made. All requests will be considered without undue delay.

If you have any concerns or wish to exercise any of your rights under the UK and EU GDPRs, then you can contact the data protection officer in the following way:

HUBER car park systems international GmbH, Data Protection Officer, Arienheller 5, 56598 Rheinbrohl, Germany; or by email: dataprotection@HUBER-carparksystems.com

This policy was last updated in January 2022 and shall be regularly monitored and reviewed.

Rheinbrohl, January 2022

A handwritten signature in blue ink, appearing to read "M. Lauble".

Markus Lauble
Managing Director

A handwritten signature in blue ink, appearing to read "Arno Geis".

Arno Geis
Managing Director