

HUBEXO GLOBAL PRIVACY POLICY

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1. Introduction

Hubexo HQ AB (“Hubexo”, “we”, “us”, “our”) is committed to protecting your privacy. This Global Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website or use our services. Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of applicable data protection legislation, the Hubexo entity with which you engage—whether by entering into a contract, receiving services, or otherwise interacting—shall act as the data controller in respect of the personal data it processes. Each such entity is independently responsible for ensuring that its processing of personal data complies with the requirements of the UK GDPR, EU GDPR, or other applicable data protection laws. This Privacy Policy applies to all such entities, unless a separate privacy notice is provided.

2. Information We Collect and How We Use Your Information

The table below provides an overview of the categories of personal data we may collect, the purposes for which we process such data, the lawful bases relied upon, and the relevant data subjects. This list reflects our current processing activities but may be updated from time to time to reflect changes in our services, legal obligations, or operational practices.

| Category of Personal Data | Purpose of Processing | Lawful Basis | Data Subjects |
|--|--|--|---|
| Identification and contact details | To manage customer relationships and deliver services; To send service-related communications | Performance of a contract; Legitimate interest | Customers, Users |
| Professional and business-related data | To manage customer relationships and deliver services; To manage contractual relationships | Performance of a contract; Legitimate interest | Customers, Business Contacts (<i>prospective clients</i>) |
| Billing and financial information | To manage customer relationships and deliver services; To comply with legal and regulatory obligations | Performance of a contract; Legal obligation | Customers, Suppliers |
| Platform usage and service interaction data (including IP addresses) | To manage customer relationships and | Performance of a contract; Legitimate interest | Users, Customers |

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| | deliver services; To analyze usage and preferences; To ensure compliance and auditability | | |
| Communication records | To manage customer relationships and deliver services; To handle disputes and legal claims | Performance of a contract; Legitimate interest | Customers, Users |
| Technical and system data | To operate and maintain our systems and infrastructure; To ensure information security; To ensure compliance and auditability | Legitimate interest; Legal obligation | Users, Employees |
| Marketing and communication preferences | To send marketing communications; To analyze usage and preferences | Performance of a contract; Consent; Legitimate interest | Customers, Business Contacts (<i>prospective clients</i>) |
| Recruitment and employment data | To manage recruitment and human resources | Performance of a contract; Legal obligation; Consent | Job Applicants, Employees |
| Whistleblowing reports | To manage whistleblowing reports; To comply with legal and | Legal obligation | Employees, Third Parties |

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|--|------------------------|--|--|
| | regulatory obligations | | |
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3. Cookies

For information about how we use cookies and similar technologies, please refer to our [Cookie Policy](#), which explains the types of cookies we use, the purposes for which we use them, and how you can manage your cookie preferences.

4. Consent Management

Where we rely on your consent as the lawful basis for processing your personal data, such consent shall be obtained in accordance with applicable data protection laws. This includes, where relevant, the requirements of the UK and EU General Data Protection Regulation (GDPR), which mandate that consent must be freely given, specific, informed, and unambiguous.

Consent may be obtained through various means, including by email, where you are asked to confirm your agreement to specific processing activities, ticking a box on a form, selecting preferences in a cookie banner, or submitting a request via our website.

You may withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. You can do so by contacting us at privacy@hubexo.com or by following the instructions provided in the relevant communication (e.g., unsubscribe links in emails or preference management tools on our website).

5. How We Protect Your Personal Data

Hubexo applies technical and organizational measures to ensure a high level of security, using a range of physical and logical security technologies and procedures appropriate to the protection of personal data. These include, but are not limited to, the following:

- Logical and physical access control

- Authentication and access management
- Data encryption
- Profile segregation
- Multi-factor authentication
- Daily and incremental backups
- Three-tier firewall protection
- Clear screen and acceptable use policies
- Segregation of production and non-production environments
- Malicious code control
- Malware protection measures
- Vulnerability management
- Incident management
- Event and incident alerting and monitoring
- Penetration testing
- Disaster recovery procedures
- Secure development policy
- Cryptographic policies
- Collection, maintenance and protection of logs and audit evidence on the platform
- Infrastructure monitoring
- Site-to-site VPN
- Time stamping authority (TSA) services
- Patch updates
- Risk management
- Data masking

Hubexo also applies audit and control mechanisms to ensure compliance with its security policies and the protection of personal data.

6. Retention of Personal Data

We are committed to comply with the personal data retention periods established by applicable legal and regulatory provisions or, in the absence thereof, retaining data only for as long as necessary to fulfil the purpose that justified its collection or for the establishment, exercise, or defense of legal claims.

7. Disclosure of Your Information

We may share your personal data with third parties that process personal data on behalf of Hubexo. Such third parties process personal data in their capacity as processors, meaning they process personal data solely under our instructions and for purposes outlined in this Privacy Policy. The relevant Hubexo entities will enter into legally binding agreements with all such processors to ensure that your personal data is handled in compliance with applicable data protection laws and is not used for any other purposes than those authorized by Hubexo.

Furthermore, we may refer you to the privacy policies of specific Hubexo Group companies, where available for further details on how your personal data is processed by those entities. Namely, the following entities have published their own privacy policies:

- Hubexo North UK Limited [Privacy Policy | NBS](#)
- Hubexo South UK Limited [Privacy Policy | Glenigan](#)
- Hubexo Ireland Limited [Privacy Policy – Construction Information Services \(CIS\)](#)
- Hubexo Portugal, SA [Personal Data Protection Policy | VORTAL](#)
- Vortal Connecting Business SA <https://www.vortal.biz/es/personal-data-protection-policy/>
- Internet Construdata21 SA <https://www.construdata21.com/>
- Armilar Business Services SL - [Inteligencia de Mercado para la Contratación Pública - Armilar](#)
- Hubexo Switzerland Limited [Privacy policy - Olmero ist die führende Schweizer Bauplattform](#)
- BCI [Privacy Policy - BCI Central](#)
- Hubexo Austria GmbH [Hubexo Austria – Privacy Policy](#)
- Hubexo Finland [Data protection](#)
- Hubexo Czech Republic and Slovakia s.r.o [Processing of personal data | ISTAV SMART |](#)
- Hubexo US, Inc [Privacy Policy of The North America Procurement Council](#)
- Hubexo Denmark A/S [Byggefakta A/S policy for data administration, integrity and cookies | Building facts](#)
- Hubexo Sweden AB [Building facts | Privacy policy](#)

8. International Data Transfers

Your information may be transferred to and maintained on servers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where such transfers involve countries outside the European Union or the European Economic Area that do not benefit from an adequacy decision by the European Commission, Hubexo undertakes to implement appropriate safeguards to ensure the confidentiality and protection of personal data. In particular, such transfers will be subject to legally recognised mechanisms, including Standard Contractual Clauses and supplementary measures, to ensure that the level of protection afforded to personal data is essentially equivalent to that guaranteed within the European Union.

9. Your Data Protection Rights

Depending on your location, you may have the following rights regarding your personal data:

- The right to access – You have the right to request copies of your personal data.
- The right to rectification – You have the right to request that we correct any information you believe is inaccurate.
- The right to erasure – You have the right to request that we erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions.
- The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

Your request should include sufficient information to identify you, specify the right you wish to exercise, and provide the basis for your request. We may ask you to verify your identity to ensure that personal data is only disclosed to its rightful owner.

Once received, your request will be assessed and responded to within the timeframes prescribed by law.

You also have the right to lodge a complaint with the relevant local supervisory authority.

10. Changes to This Privacy Policy

We may update our privacy policy from time to time. We will notify you of any changes by posting the new privacy policy on this page. You are advised to review this privacy policy periodically for any changes.

11. Contact Us

If you have any questions regarding this Privacy Policy or wish to exercise your rights as a data subject, you may contact us at:

- Email: privacy@hubexo.com
- Address: Fälttelegrafplatsen 4, 16971 Solna, Sweden

Where required by applicable data protection legislation, Hubexo may appoint a Data Protection Officer (DPO). If a DPO has been appointed, you may also use this contact channel to reach them.

DOCUMENT CONTROL

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