Privacy Notice: All Breedon Group Drivers

September 2026: Version 4.0

This privacy notice describes how the Breedon Group (**We/Us**) collects and uses information about its drivers, before, during and after the contractual relationship, to the extent such information is personal data in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) and the UK GDPR as defined in section 3(10) of the Data Protection Act 2018 (**GDPR**). This document also satisfies our obligations under Article 30 of the GDPR. It applies to all drivers to the Breedon Group (**You**) being those persons engaged to transport construction materials on behalf of Breedon. A driver may be a permanent or temporary employee, on work experience, on an apprenticeship, an agency worker, a consultant, a contractor or an individual working for a third party supplier of haulage services.

Data Controller Details

The Company is a data controller for the purposes of the GDPR and every supplier on behalf of itself and any of its directors, shareholders, members, employees, servants and agents ("associates") acknowledges the use and processing of personal data described in this privacy notice.

Company means the member of the Breedon Group a driver has contracted to provide services to or on whose behalf they provide those services. **Breedon Group** means any of the companies within the Breedon group of companies, including, without limitation, Breedon Trading Limited, Breedon Cement Limited, Breedon Materials Limited, Breedon Surfacing Solutions Ireland Limited, Whitemountain Quarries Ltd, Breedon Cement Ireland Limited and/or Breedon Brick Limited further details of which can be found at www.breedongroup.com.

Categories of Data Subjects

The majority of our drivers are employees or sole traders or part of a partnership. We may therefore collect personal data from those types of drivers and any employees or individuals working for a third party provider of haulage services (collectively these are all "drivers").

Categories of Personal Data

We may collect the following categories of personal data about drivers:

- Personal details including name, title, address, email, telephone number including mobile phone or other contact information;
- Date of birth and/or age;
- Gender, nationality, marital status, dependants, next of kin and emergency contact information;
- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- Trade Union membership;
- Information about your health and wellbeing;
- Criminal convictions and offences;
- Copy of passport, driving licence and insurance certificates;

- Employment information or terms of engagement including start date, annual leave, contract hours, training records, disciplinary and grievance information;
- Banking, taxation and financial information including VAT details:
- Credit information (through an external third party);
- Electronic identification data including IP address collected through our websites;
- Contractual details including the goods and services provided, trading history with the Company, insurance details and frequency of use;
- Audio recordings of all telephone enquiries and driver communications (**Audio Data**);
- Images (still or video) from the closed circuit television (**CCTV**) on the Company's sites or from onboard vehicle monitoring (but excluding Vehicle CCTV Data) (**CCTV Data**);
- Telemetry data from onboard tracking systems (**Telemetry Data**);
- Real time location tracking from our onboard tracking systems (**Live Tracking Data**); and/or
- Live video recordings from any onboard driving facing, or outward facing camera installed in a fleet vehicle (**Vehicle CCTV Data**).

Source of personal data

Most of the information we obtain comes directly from the driver. In the case of Audio Data from our IT systems, Live Tracking Data, Telemetry Data, from our vehicle tracking systems and CCTV Data from a combination of both. Some information may come from external third party credit reference agencies or credit insurers. If you don't provide us with this data we may be unable to enter into or conclude a contract with you.

Purposes of Data Processing

The Company collects and processes data about drivers, some of which may be personal data as defined under GDPR, Audio Data, CCTV Data, Live Tracking Data, Vehicle CCTV Data and Telemetry Data, for purposes which include:

- As necessary to **perform a contract** with a driver including:
    - To take steps at the driver's request prior to entering into a contract;
    - To decide whether to enter into a contract;
    - To make credit decisions about the driver or its associates regarding the contract or the entering into of a new contract with us;
    - To manage, perform and operate the contract and the driver's account;
    - To update our records;
    - To resolve any complaints in relation to the contract;
    - To pay a driver, including any overtime;
    - Conducting performance reviews, managing performance and determining performance requirements;
    - Assessing qualifications for a particular job or task, including decision making about the driver;
    - Making arrangements for the termination of our working relationship;
    - Education, training and development requirements.

- As necessary to **perform a contract** with a customer or supplier including:
    - To ensure effective delivery of our goods;
    - To ensure effective collection of goods;
    - To keep the customer updated as to your location or arrival time etc;
    - For quality and training purposes.

- As necessary for our own **legitimate interests** or those of other persons and organisation, for example:
    - For good governance, accounting and managing and auditing our business operations;
    - To search credit reference agencies;
    - To protect the health and safety of workers and others;
    - Maintaining, monitoring, improving and enhancing our goods and services;
    - To process Vehicle CCTV Data (outward-facing cameras and driver-facing cameras) in the event of an Incident;
    - To monitor Audio Data, CCTV Data, Live Tracking Data and Telemetry Data for:
        - quality control and training;
        - improvements in the systems;
        - the detection and prevention of crime or unauthorised use of our systems;
        - updating our customers as to the location of a driver;
        - dealing with legal disputes involving You, or other workers, including but not limited to verification of information provided and accidents at work;
        - conducting data analytics studies to review and better understand job management performance and route mapping optimisation.

- As necessary to comply with our **legal obligations** for example:
    - Where disclosure is necessary for or in connection with any legal proceedings (including prospective legal proceedings), for obtaining legal advice or for establishing, exercising or defending legal rights;
    - For tax collection purposes;
    - To comply with any regulatory obligations to which we are subject;
    - Where we are required to do so by law (including under any legislation, or by a court or tribunal in any jurisdiction);
    - For fraud prevention and money laundering purposes in compliance with our statutory obligations.

In this privacy notice **Incident** means:

- Vehicle damage or collision of any kind
- Third party complaint about a vehicle or its driver
- A notified near miss or High Potential Opportunity involving a vehicle, driver or Breedon Group employees or subcontractors working in or around a vehicle

Where a driver is also an employee we also process personal data in accordance with the *GDPR Privacy Notice All Breedon Group Workers*.

Categories of Personal Data Recipients

We disclose personal data to a number of recipients which includes the following categories of persons:

- Other companies within the Breedon Group;
- Auditors and professional advisors, such as our bankers, lawyers and consultants;
- Law enforcement officials and statutory or regulatory authorities and courts;
- Third party service providers, such as providers of CCTV management; Audio Data management; IT system management; on board tracking systems; credit checks; contractors or subcontractors or associated services necessary to perform the contract;

- Customers to inform them of your location via Live Tracking Data.

We may use and replace any third party which we wish to use to assist us in meeting its obligations under the contract, and where such third party is a processor of personal data, this constitutes prior general written authorisation as envisaged by Article 28(2) of the GDPR.

We may transfer personal data outside the EEA in accordance with the principles of the GDPR.

Data Protection Principles

We will comply with data protection law which includes the GDPR (**Data Protection Laws**) applicable in the country in which the Company operates. This says that the personal information we hold must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that have been clearly explained and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

Personal Data Retention Periods

Except as otherwise permitted or required by applicable law or regulation, we only retain personal data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

We typically retain personal data obtained from suppliers for 6 years after the completion or termination of the contract, save for Audio Data and Live Tracking Data which is retained for 6 months; Telemetry Data or CCTV Data which is retained for 30 days; Vehicle CCTV Data (outward-facing cameras and driver-facing cameras) which is retained for 90 days, in each case unless there has been an Incident in which case a proportionate part of the personal data will be retained for a longer period assessed on its merits at the time, but relevant to the nature of the Incident e.g. to comply with requirements of a regulator (e.g. HSE) or the police or due to limitation of liability (e.g. for a personal injury claim).

Technical and Organisational Security Measures

We have implemented technical and organisational security measures to protect personal data.

Duty to inform us of changes

It is important that the personal information we hold about suppliers is accurate and current. We ask all our suppliers to keep us informed if personal information changes during your contractual relationship with us.

Suppliers' rights in connection with personal information

Under certain circumstances, by law suppliers have the right to:

- **Request access** to personal information.
- **Request correction** of the personal information that we hold.
- **Request erasure** of personal information.
- **Object to processing** of personal information where we are relying on a legitimate interest (or those of a third party) and there is something about the particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of personal information.
- **Request the transfer** of personal information to another party.
- **Raise a complaint** about the processing of personal information.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Breedon Group.

You may make a complaint to the local data commissioner's office in which the Company operates if you are dissatisfied as to how your personal data is being processed. In the first instance you can also make a complaint to the Company by emailing *legal.compliance@breedongroup.com*

Data Processors

For the purposes of the contract and GDPR, we are of the view that it is the Company which is the data controller. However, if the Company is deemed to be acting as data processor for the purposes of the contract (or the supplier is held to be a data processor in relation to any of the Company's personal data they receive during the contract) then the relevant processor shall:

- act only on the written instructions of the controller (unless required by law to act without such instructions);
- ensure that people processing the data are subject to a duty of confidence;
- take appropriate measures to ensure the security of processing;
- only engage a sub-processor with the prior consent of the data controller and a written contract;
- assist the data controller in providing subject access and allowing data subjects to exercise their rights under the GDPR;
- assist the data controller in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments;
- delete or return all personal data to the controller as requested at the end of the contract; and
- submit to audits and inspections, provide the controller with whatever information it needs to ensure that they are both meeting their Article 28 obligations, and tell the controller immediately if it is asked to do something infringing the GDPR or other data protection law of the EU or a member state.

Each of the parties, shall, comply with its obligations under the GDPR, shall co-operate with the relevant supervisory authorities and upon request provide the other with reasonable assistance, information and cooperation, at its own expense, to ensure the other party's compliance with their respective obligations.

Changes to this Privacy Notice

We reserve the right to amend this Privacy Notice from time to time consistent with the GDPR and other applicable data protection requirements.

You can contact us at *legal.compliance@breedongroup.com*

Breedon Group plc

September 2026