

UK External Privacy Notice

This privacy notice aims to give you information on how we collect and process personal data through the work we carry out for our clients and related business activities.

We make changes to this notice from time to time.

This privacy notice will inform you of:

- your privacy rights
- how the law protects you
- how we look after your personal data, why we hold it and what we do with it



CONTROLLER/PROCESSOR

DIRTT Environmental Solutions is made up of different legal entities, including the following:

- DIRTT Environmental Solutions Ltd. Alberta, Canada
- DIRTT Environmental Solutions, Inc. Colorado, US (Subsidiary)
- Ice Edge Business Solutions Ltd. Alberta, Canada (Subsidiary)
- Ice Edge Business Solutions, Inc. Delaware, US (Subsidiary)
- DIRTT Environmental Solutions Ltd. England and Wales (Subsidiary)

This privacy notice is issued on behalf of DIRTT Environmental Solutions so when we mention DIRTT Environmental Solutions, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the group responsible for processing your data.

We will let you know which entity will be the controller for your data when required.

When we alone or jointly with others, determine the purposes and means of the processing of personal data we will be the/a data controller.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact info@dirtt.com. You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

WHAT INFORMATION DO WE COLLECT?

When you visit this website, use our products or where we carry out related activity you may knowingly provide us with personal information or we may collect personal information about you.

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data - includes first name, last name, username or similar identifier, title, date of birth and gender
- Contact Data - includes email address and telephone numbers
- Financial Data - includes bank account and payment details
- Technical Data - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- Profile Data – includes your username and password
- Usage Data - includes information about how you use our website, products and services
- Marketing and Communications Data - includes your preferences in receiving marketing from us and your communication preferences

01

PERSONAL INFORMATION YOU CHOOSE TO PROVIDE

Registration Information

When you register for any of our products, services or newsletters you will provide us information about yourself

Email Information

If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same protections for these electronic communications that we employ in the maintenance of information received by mail and telephone

02

WEBSITE USE INFORMATION

Similar to other commercial websites, our website utilises a standard technology called “cookies” (see explanation below, “What Are Cookies?”) and web server log files to collect information about how our website is used. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our website, and the websites visited just before and just after our website.

What Are Cookies?

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site’s computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser’s preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. Browsers are usually set to accept cookies.

However, if you do not want a Cookie placed on your computer, you may disable Cookies altogether by modifying the preferences section of your web browser (under Edit/Preferences/Advanced). Note that it is possible that some aspects of Ice Edge Business Solutions Ltd. site may be unavailable to you if you choose this option. If you have no problem accepting Cookies, but wish to be informed of their appearance, you may turn on a warning prompt by modifying the cookie warning section in Edit/Preferences/Advanced.

IP Addresses

IP addresses are used by your computer every time you are connected to the Internet. Your IP address is a number that is used by computers on the network to identify your computer. IP addresses are automatically collected by our web server as part of demographic and profile data known as traffic data so that data (such as the Web pages you request) can be sent to you.

03

THIRD PARTY AND PUBLICLY AVAILABLE SOURCES

We may receive personal data about you from various third parties and public sources as set out below:

- Identity and Contact Data from your employer where they use our services
- Identity and Contact Data from publicly available sources

SHARING AND SELLING INFORMATION

We do not share, sell, lend or lease any of the information that uniquely identify a subscriber (such as email addresses or personal details) with anyone except to the extent it is necessary to process transactions or provide services.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Generally we do not rely on consent as a legal basis for processing your personal data.

We have set out below a description of all the ways we plan to use personal data, the legal bases we rely on to do so, and whether we process that data as data controller or processor. We have also identified what our legitimate interests are where appropriate.

Please Contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis (including basis of legitimate interest)	Controller/Processor
Administering our provision of our services to you/ your employer	Identity Contact	Necessary for our legitimate interests (performance of a legitimate business contract with you/employer)	Controller
To administer and protect our business, this website and our products (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)	Controller
To use data analytics to improve our website, products/ services, marketing, customer relationships and experiences	Technical Usage	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	Controller
Marketing Activity	Identity Contact	Necessary for our legitimate interests (to market to potential and existing customers in a compliant manner)	Controller

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out above.

Internal Third Parties

Other companies in our Group acting as joint controllers or processors which may not be located within the EEA.

External Third Parties

- Service providers acting as processors which may not be located within the EEA and provide IT and system administration services
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services
- Regulators and other authorities who require reporting of processing activities in certain circumstances including HM Revenue & Customs
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

Our group is based in Canada and some of our external third parties are based outside the European Economic Area (EEA) so processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe
- Where we use providers based in the US (including some servers used by Google), we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. or if they have executed a Data Transfer Agreement to provide such protection

If you want further information on the specific mechanism used by us when transferring your personal data out of the EEA please contact info@dirtt.com.

SECURITY

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Retention of Data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- Request the transfer of your personal data to you or to a third party. We

will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you

- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

If you wish to exercise any of the rights set out above, please contact info@dirtt.com.

No fee usually required – You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you – We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond – We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

POLICY MODIFICATIONS

We may change this Privacy Policy from time to time. If/when changes are made to this privacy policy, we will email users who have given us permission to do so. We will post any changes here, so be sure to check back periodically. However, please be assured that if the Privacy Policy changes in the future, we will not use the personal information you have submitted to us under this Privacy Policy in a manner that is materially inconsistent with this Privacy Policy, without your prior consent.