



WIG-DATA PROTECTION PRIVACY POLICY EXTERNAL V3

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1. Important information and who we are

WIG is a data controller and its group is made up of different legal entities, including Kiopla Limited, Telecoms Infrastructure Suppliers Limited, Telecommunications Wireless & Infrastructure Services Limited, Open Network Systems Limited, WIG (Netherlands) B.V., The Wireless Infrastructure Company Limited, The Wireless Resources Company Limited, the Wireless Development Company Limited, Fields & Towers Limited and The Wireless Asset Company Limited ("**WIG Group**"). This privacy notice is issued on behalf of the WIG Group so when we mention "WIG", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the WIG Group responsible for processing your data.

This privacy policy aims to give you information on how WIG collects and processes your personal data as a controller through your use of our online controlled access management system ("**OCAMS**") system and/or this website, by being one of our customers (or their agent), by leasing us land (or negotiating the potential lease of land to us), by applying for employment and/or to work with WIG, by sending us correspondence and/or providing us with products and/or services. In addition, it outlines your data protection rights under the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679) (the "**GDPR**").

Please contact Wireless Infrastructure Group Limited (registered number 05435379), in writing at Level 13, Broadgate Tower, Primrose Street, London, EC2A 2EW if you have any queries in relation to the processing of your personal data under this policy.

WIG may from time to time update this policy. Please refer back to this page regularly to see any changes or updates to this policy.

2. Categories of data subjects

(a) contractors/users of ocams system

The following section of this policy sets out how WIG may process personal data about contractors, engineers and/or users of our OCAMS system (the "**Contractors**").

We may hold personal data about Contractors which is provided to us by you directly, or by administrators on your behalf, through the use of the OCAMS system, by completing application forms, through our website, telephone calls and/or corresponding with us or which is provided to us by third parties. We may also process personal data about individuals that are connected with you as a Contractor (for example employees, representatives, sub-contractors or agents).

We may collect, store, and use the following categories of personal information about you: contact details (including name, title, employer name and address, telephone number, email address), log in details, passwords, job title, qualifications, and details relating to your activity and/or conduct while working on any of our sites.

We may also where necessary in relation to secure locations collect, store and use a "special category" of sensitive personal data relating to criminal convictions and offences.

We may collect personal data about Contractors from the following sources: you, the Contractor directly; administrators through the use of the OCAMS, Your personal data may be processed by WIG or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- (a) to hold your personal data on our system and to contact you as necessary in accordance with WIG's contractual obligations, or on the basis of the legitimate interests of WIG or WIG's customers
- (b) to provide you with information on WIG, which is being carried out to pursue WIG's legitimate interest;
- (c) to assess your skills and qualifications as necessary to permit access to its sites and/or infrastructure to pursue the legitimate interests of WIG, WIG customers and/or landlords;
- (d) to allow us to administer and manage your access to WIG's sites and infrastructure which are necessary for the purpose of WIG pertaining its contractual obligations, to comply with applicable laws and/or to pursue the legitimate interests of WIG, WIG's customers and/or landlords;
- (e) to allow us to process bookings in respect of access to our sites or infrastructure and/or in relation to any goods and services provided;
- (f) to update and maintain records for WIG, including details of people that have accessed its sites, to pursue the legitimate interests of WIG and/or third parties including WIG's customers and landlords;
- (g) to carry out actions in an attempt to detect, prevent, investigate and/or prosecute fraud and crime, which WIG considers necessary for compliance with its legal obligations, for the performance of a task being carried out in the public interest and/or to pursue the legitimate interests of WIG, WIG customers and/or landlords;
- (h) to prepare tax related information in order to report to tax authorities in compliance with a legal obligation to which WIG is subject;
- (i) to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- (j) such other actions as are necessary to manage the activities and/or to comply with the legal and/or regulatory requirements of WIG, including by processing instructions, monitoring and recording electronic communications (including telephone calls and emails) for quality control, analysis and training purposes, and enforcing or defending the rights and/or interests of WIG, its landlords and/or customers, in order to comply with WIG's legal obligations and/or to pursue the legitimate interests of WIG, its landlords and/or WIG's customers.

Where such processing is being carried out on the basis that it is necessary to pursue the legitimate interests of WIG or a third party, such legitimate interests are not overridden by your interests, fundamental rights or freedoms.

WIG does not anticipate being required to obtain your consent for the processing of your personal data as listed above. If WIG wishes to use your personal data for other purposes which do require your consent, WIG will contact you to request this.

If you fail to provide information when requested, which is necessary for us to consider your application of access to our sites, we will not be able to process your application.

We envisage that in certain circumstances we will process information about criminal convictions. We will only collect information about criminal convictions history if relevant to the application to one of our sites. We are required in certain circumstances to collect this information to satisfy ourselves that there is nothing in your criminal convictions history which makes it unsuitable for you to access and/or work on our sites and/or infrastructure.

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.

(b) Landlords (and representatives)

The following section of this policy sets out how WIG may process personal data, as a controller, about (current, potential and previous) landlords and their representative (and employees thereof). We may collect, use, store and transfer different kinds of personal data about you which you provide to us including: name, address, email address, telephone numbers, place of work, job title and bank details

We do not collect any sensitive personal data or special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. We will use your personal data in the following circumstances: where it is necessary for the legitimate interests of WIG or those of a third party (such as WIG customers) and where your interests and fundamental rights are not overridden or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by WIG or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- (a) to hold your personal data on our system and to contact you as necessary in accordance with WIG's contractual obligations with you landlord, or on the basis of the legitimate interests of WIG and/or WIG customers;

- (b) to allow us to process payments in connection with the leasing arrangements in place;
- (c) to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- (d) such other actions as are necessary to manage the activities of WIG, including by processing instructions, , and enforcing or defending the rights or interests of WIG and/or third parties including WIG's customers, in order to comply with its legal and/or regulatory requirements and/or to pursue its legitimate interests.

We do not anticipate being required to obtain your consent for the processing of your personal data as listed above. If we consider it necessary to use your personal data for other purposes which do require your consent, we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent, please contact us in writing at Level 13, Broadgate Tower, Primrose Street, London, EC2A 2EW. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Where such processing is being carried out on the basis that it is necessary to pursue WIG and/or a third party's legitimate interests, such legitimate interests do not override your interests, fundamental rights or freedoms.

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.

(c) Job applicants

The following section of this policy sets out how WIG may process personal data (as a controller) about applicants of jobs or placements and potential workers and contractors.

WIG is the data controller of the personal data that you provide or which is provided to or collected by WIG during and/or in connection with any application for a position at WIG.

In connection with your application for work with us, we will collect, store, and use some or all of the following categories of personal data about you: name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, information provided to us during telephone calls, interviews and/or meetings with you, information contained in your CV and cover letter or email, and references.

We may also collect, store and use the following “special categories” of sensitive personal data: Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions, information about your health, including any medical condition, health and sickness records and/or information about criminal convictions and offences.

We may collect personal data about candidates from the following sources: you, the candidate directly; recruitment agencies; background check providers; credit reference agencies; disclosure and barring service in respect of criminal convictions; your named referees; and data from third parties is from a publicly accessible source including Companies House records and social media (such as LinkedIn).

Your personal data may be processed by WIG or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- (a) to assess your skills and qualifications, to consider your suitability for the position and to decide whether to enter into a contract with you;
- (b) to carry out background and reference checks, where applicable;
- (c) to communicate with you about and in connection with the recruitment process;
- (d) to keep records related to our hiring processes;
- (e) to comply with legal or regulatory requirements;
- (f) to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- (g) such other actions as are necessary to manage the activities of WIG, including by processing instructions, and enforcing or defending the rights and interests of WIG, in order to comply with its legal obligations and/or to pursue its legitimate interests.

We process this personal data on the basis of our legitimate interests (in order to decide whether to appoint you to work for us) and/or in order to comply with applicable laws.

Once we receive your CV and covering letter or your application form, we may process that information to decide whether WIG has any suitable vacancies and if you meet the basic requirements to be shortlisted for that role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the work. If we decide to offer you the work, we will then take up references and we may carry out a criminal record or other checks before confirming your appointment.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

We will use your sensitive personal data in the following ways:

- we will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during the interview; and
- we may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure equal opportunity monitoring and reporting.

We envisage that in certain circumstances we will process information about criminal convictions. We will collect information about your criminal convictions history if we would like to offer you the work or a position (conditional on checks and any other conditions, such as references, being satisfactory) and consider this necessary for the role being considered and in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

We have in place appropriate safeguards which we are required by law to maintain when processing such data.

If your application is successful, the information you provide during the application process will be retained by WIG as part of your employee file and held in accordance with WIG's employee privacy policy or applicable laws.

If your application is unsuccessful, the information you have provided will be retained by WIG for six (6) months after we have communicated to you our decision to you. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy or applicable laws and regulations. Alternatively, we may hold information as long as necessary where we legitimately consider a future opportunity may arise that we may wish to consider you for.

(d) Visitors to our website

The following section of this policy sets out how WIG may process personal data (as a controller) about visitors to its website.

We may collect, use, store and transfer different kinds of personal data about you which you provide to us through our website: name,, email address, , technical data (including 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, usage data (including information about how you use our website, products and services.

We do not collect any sensitive personal data or special categories of personal data about you through our website (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

We use different methods to collect data from and about you including through:

- direct interactions with you, including by filling in forms. This includes personal data you provide when you subscribe to our publications and/or request marketing to be sent to you.
- automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party (including in relation to the sending of electronic marketing communications) and where your interests and fundamental rights are not overridden by those interests, or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by WIG or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- (a) to use data analytics to improve our website, marketing, customer experiences on the basis of our legitimate interests;
- (b) to comply with legal or regulatory requirements;
- (c) to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- (d) such other actions as are necessary to manage the activities of the WIG, including by processing instructions, and enforcing or defending the rights and/or interests of WIG, in order to comply with its legal and/or regulatory obligations and/or to pursue its legitimate interests.

If we consider it necessary to obtain your consent in relation to the use your personal data, we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

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.

Where the Website provides links to other websites, WIG is not responsible for the data protection/privacy/cookie usage policies of such other websites, and you should check these policies on such other websites if you have any concerns about them. If you use one of these links to leave our website, you should note that we do not have any control over that other website.

Cookies: A cookie is a small file which asks permission to be placed on your computer. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular website. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our Website by tailoring it to the needs of users. We only use this information for statistical analysis purposes.

Overall, cookies help us provide a better website by enabling us to monitor which pages users find useful and which they don't. A cookie does not give us access to a user's computer or any information about them, other than the data they choose to share with us.

The browsers of most computers, smartphones and other web-enabled devices are usually set up to accept cookies. If your browser preferences allow it, you can configure your browser to accept all cookies, reject all cookies, or notify you when cookies are set. Each browser is different, so check the "Help" menu of your browser to learn about how to change your cookie preferences.

However, please remember that cookies are often used to enable and improve certain functions on our website.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

For further details on cookies (including how to turn them off) can be found at www.allaboutcookies.org.

(e) Business contacts

The following section of this policy sets out how WIG may process personal data (as a controller) about its business contacts and (current, previous and/or potential) service providers and customers (and employees of service providers and customers) and data subjects that have provided a business card to, or have corresponded with, an employee of WIG.

We may collect, use, store and transfer different kinds of personal data about you which you provide to us including: name, address, email address, telephone numbers, place of work, job title.

We will use your personal data in the following circumstances: where it is necessary for our legitimate interests, or those of a third party such as the network operators and/or our landlords and where your interests and fundamental rights are not overridden or where we need to comply with a legal or regulatory obligation.

Your personal data may be processed by WIG or its sub-processors (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:
to hold your personal data on our system and to contact you on the basis of the legitimate interests of WIG and/or third parties (such as our landlords or customers) (including in connection with using the services that you provide);

- (a) in respect of suppliers, to allow us to process payments and orders in respect of any goods and services provided;
- (b) to comply with legal or regulatory requirements;
- (c) to scan and monitor emails sent to us (including attachments) for viruses or malicious software, to process and encrypt personal data to protect and manage email traffic, and to store personal data on our systems to pursue our legitimate interests including for document retention purposes; and
- (d) such other actions as are necessary to manage the activities of WIG, including by processing instructions, and enforcing or defending the rights or interests of WIG and/or third parties (such as our landlords or customers), in order to comply with their legal obligations and/or to pursue their legitimate interests.

If we consider it necessary to obtain your consent in relation to the use your personal data, we will contact you to request this consent. In such circumstances, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If you decide to provide your consent, you have the right to withdraw your consent at any time, although that will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communication, please contact us in writing at Level 13, Broadgate Tower, Primrose Street, London, EC2A 2EW or following the unsubscribe instructions included in any electronic marketing communication. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Where such processing is being carried out on the basis that it is necessary to pursue the legitimate interests of WIG or a third party, such legitimate interests do not override your interests, fundamental rights or freedoms. Such processing may include the use of your personal data for the purposes of sending you electronic marketing communication, in relation to which you can at any time subscribe by following the instructions contained in each marketing communication.

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.

3. Disclosures of your personal data

We will not disclose personal information we hold about you to any third party except as set out below.

We may disclose your personal data to other members of our group, to the Boards of the members of our group, to third parties who are providing services to us, including IT service providers. We may also disclose personal data we hold to third parties:

- (a) in the event that we sell any business or assets, in which case we may disclose personal data we hold about you to the prospective and actual buyer of such business or assets; and/or
- (b) if we are permitted by law to disclose your personal data to that third party or are under a legal obligation to disclose your personal data to that third party.

4. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

5. Data security

WIG has put in place measures to ensure the security of the personal data it collects and stores about you. It will use its reasonable endeavours to protect your personal data from unauthorised disclosure and/or access, including through the use of network and database security measures, but it cannot guarantee the security of any data it collects and stores.

WIG will notify you and any applicable regulator of a suspected personal data breach where we are legally required to do so.

6. Your legal rights

In certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

- Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.
- Withdraw your consent. If we are processing your personal data on the basis of your consent, you have the right to withdraw such consent at any time. Withdrawing your consent will not affect the lawfulness of processes based on consent before its withdrawal. To withdraw your consent or to opt out of receiving marketing communication, please contact us in writing at Level 13, Broadgate Tower, Primrose Street, London, EC2A 2EW or following the unsubscribe instructions included in each electronic marketing communication. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you wish to exercise any of the rights set out above, please contact us in writing at Level 13, Broadgate Tower, Primrose Street, London, EC2A 2EW.

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. 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.

We try to respond to all legitimate requests within three months. Occasionally it may take us longer than this period 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.

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.

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal data has been handled, please contact in writing at Level 13, Broadgate Tower, Primrose Street, London, EC2A 2EW.