

DATA RETENTION POLICY

EQUANS UK & Ireland (EQUANS) combines its expertise in technical services & facilities management, energy solutions and regeneration to empower businesses and communities to fully embrace the energy, digital and industrial transitions that are reshaping the way we use energy, as well as move, work and live.

Our Data Retention Policy and procedures have been developed in accordance with EQUANS' global 'fundamentals' - the common framework and ways of working that provide the basis for how we manage and operate across our entire business.

This Policy applies to all EQUANS employees in the UK. It sets out EQUANS's policy in relation to the retention of both personal and commercial data and should be read in full.

We are all faced with an ever-increasing volume of records, including emails, commercial documents, files and traditional paper documents. Legislation and regulation covering records management is complex and far-reaching that compliance can become a major challenge as well as a drain on time and money.

EQUANS UK is committed to protecting its own business interests and those of its customers, suppliers, employees, and shareholders by holding data (both personal and commercial) only for the time period necessary to accomplish the objectives for which that data was collected or created.

Failure to achieve this can result in:

- Fines for non-compliance
- Risk of investigatory audits by the authorities or clients
- Reputational damage with clients
- Risk of prosecution, claims for damages or claims for injunctions in civil proceedings

The above makes a mandatory data retention policy an indispensable tool for minimising both business risks and the chance of costly litigation, caused either by destroying information before, or retaining it beyond, the end of its legally required retention period.

This policy sets out the framework for legally compliant efficient data retention in the UK and Ireland BU together with business efficiency through controlling the volume of data held.

In conjunction with our other policies it aims to protect company, client and employee information by ensuring:

- Accuracy – stale inaccurate data is not being used in decision making / our activity;
- Availability - authorised users have access to information and associated assets when required;
- Business continuity – appropriate storage for company data;
- Clarity and consistency – a single set of rules across the BU;
- Compliance - data is retained appropriately, in line with contractual, legal or other regulatory requirements, and
- The risk of damage to company reputation and assets resulting by incorrect data retention is minimalised;

All managers are directly responsible for implementing the Schedule of Data Retention in their business areas, and for adherence by their reports.

It is the responsibility of each employee to comply with this Data Retention Policy.

A handwritten signature in blue ink, appearing to read "Jean-Philippe Loiseau", is written over a horizontal line.

Jean-Philippe Loiseau
Chief Executive Officer
EQUANS UK & Ireland