

BRADFORD WATTS

PRIVACY POLICY

At Bradford Watts Ltd. we are committed to protecting and respecting your privacy. This policy sets out the basis on which any Personal Data we collect throughout our relationship with you, will be processed by us. Please read this privacy notice carefully to understand your rights and our views and practices regarding your Personal Data.

For the purpose of data protection legislation, the data controller is:

Bradford Watts Ltd. of 2 Whitehall Estate, Flex Meadow, Essex, CM19 5TP.

This policy is overseen by the SHEQ Manager (SHEQM). If you have any queries, complaints or requests please contact the SHEQM at sheqreporting@bradfordwatts.co.uk or Tel: 01992 657555.

This notice was first established and introduced on 20 January 2021.

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UPDATE: COVID-19

In order to protect the safety of our workforce, we may be required to collect your personal data for purposes related to our Covid-19 response. That may include information about your health including whether or not you have or have had Covid-19, whether or not you are displaying Covid-19 symptoms, your medical status (e.g., your “shield” status as set out by the government), and results from Covid-19 tests, including tests that we may be required to conduct at our offices and on our sites.

We may also be required to collect personal data relating to individuals within your household or individuals that you have been in contact with who have Covid-19 or are displaying Covid-19 symptoms, in particular where that requires you to self-isolate at home.

This information will allow us to make decisions about whether individuals can continue to work at our offices and on our sites and about any steps we need to put in place to protect the safety of our workforce. We will collect this information where we are legally allowed to do so and in accordance with this privacy policy.

WHAT INFORMATION DO WE COLLECT FROM YOU?

We will collect and process the following data about you:

Information you give us:

This is information about you that you give us directly. You may do this by filling in forms on our website or by corresponding with us by phone, email or otherwise. Information you send to us may be stored and processed by Bradford Watts Ltd. This will include any emails or other electronic messages and any documents, photos or other files stored on or processed through our systems or devices. Please be aware that by entering information onto these systems you are sharing that information with Bradford Watts Ltd.

Information we collect throughout our relationship:

We will collect information throughout your time with us. This may include information about location, employees, projects, working hours and other relevant information.

The type of information we collect:

This may include, but is not limited to the following (and may include Special Categories of Personal Data as defined below):

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Identification information:

- Name, title.
- Contact details - address, telephone number, mobile telephone number, email address.
- Employment related information - job title, company, business contact information, C.V., and employment application.
- Browsing behaviour - When you visit our website, we may collect information about your online browsing behaviour and any devices you have used to access our site (including your IP address, browser type and mobile device identifiers).
- Location - We may collect your location data through your IP address.
- Preferences - We collect information about what Bradford Watts Ltd. services you are interested in and the sectors that you may wish to be updated on.
- Dietary requirements - In some cases, such as for attendance at catered events, we may collect and process special dietary requirements for reasons of health or religion.
- Information about your health – In some cases, we may collect information which is categorised as ‘health data’ such as in respect of accessibility to buildings or accessibility to documents and other materials.
- Equality and Diversity: – You may choose to share information about your ethnicity, culture, sexuality, or beliefs etc. with us for inclusion purposes. This information will be treated as highly confidential.

Other data which we may notify you of from time to time.

Opinion: - Bradford Watts Ltd. may also contact you to ask you to take part in voluntary surveys to hear your opinion of current services or of potential new services on offer. If you choose to take part in these surveys, we will collect the information you provide. We also collect data you provide in emails and phone calls for example, your questions to customer support.

WHY DO WE COLLECT THIS INFORMATION?

We use this information in the following ways:

Information you give to us and that we collect. We process your Personal Data for the following reasons:

Based on our legitimate interest to:

- Inform you of our services through email, mail, telephone, or SMS text message.
- Send you information on promotional content.
- Remember you when you visit our website and see how you journey through it by using cookies.
- Remember you when you use our forms to download content or sign up for a newsletter.
- Supply, improve and support the services we provide.
- Keep our site and systems safe and secure.
- Ensuring and protecting the health and safety of our workforce.
- Understand our customer base and purchasing trends.
- Defend against or exercise legal claims and investigate complaints.
- Understand the effectiveness of our marketing.

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Based on performance of our contract with you, or in order to take steps at your request to enter into a contract with you, for example:

- When applying for a vacancy advertised on our website; or
- In performing our obligations under our contract to which you are a party.

Pursuant to our legal obligations:

- The provision of products and services.
- Data protection.
- Health and safety.
- Anti-money laundering.
- Fraud investigations.
- Assisting law enforcement; and any other legal obligations placed on us from time to time. We may also process data on the basis of your consent or explicit consent.
- Where we rely on your consent for processing this will be brought to your attention when the information is collected from you.

We may inform you of additional purposes for processing your information when that information is collected from you.

Information we receive from other sources. See the 'Who might we share your information with?' section below for details of how we use information in conjunction with third parties.

We may inform you of additional purposes for processing your information when that information is collected from you.

HOW CAN YOU CHOOSE AND CONTROL WHAT INFORMATION WE SEND YOU?

You can choose whether you wish to receive promotional emails, SMS messages and telephone calls from Bradford Watts Ltd. by contacting us at info@bradfordwatts.co.uk

We encourage you to keep your personal settings and personal data accurate and up to date.

HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

We only store your information for as long as is required for the purpose it was collected. Should you wish to have more information about how long we retain your data, please contact our SHEQM at: sheqreporting@bradfordwatts.co.uk or 07518925390.

Information stored generally on IT systems, such as email history, will be deleted regularly in line with our policies.

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Automated decision making:

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration.
- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.
- If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

WHO MIGHT WE SHARE YOUR INFORMATION WITH?

Where information is shared with third parties, we will only share the information required for the purpose it is being shared.

For the purposes set out in the 'Why do we collect this information?' section above, we have the right to share your personal information with:

- Our clients.
- Our suppliers and sub-contractors and the suppliers and subcontractors of our clients where required.

Additionally, we will disclose your personal information to the relevant third party:

- In the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets.
- To third parties when it is necessary for the establishment, exercise, or defence of legal claims.
- If we are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.
- If we choose to exercise a legal power to do so.
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply contractual terms or other agreements; or to protect the rights, property, or safety of ourselves our customers, our regulator, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention of money laundering and credit risk reduction.

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HOW YOUR DATA IS STORED AND KEPT SECURE?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained from the SHEQM.

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

We may transfer your data outside the European Economic Area ("EEA"). We will only do so if adequate protection measures are in place in compliance with data protection legislation. We use the following protection measures:

- Transferring to Commission approved countries.
- Using Commission approved model contractual clauses.
- Requiring companies to whom we transfer data to be signed up to appropriate certification.
- Transferring when one or more of the conditions set out in the Data Protection Act 2018 and Article 49 GDPR are met.

WHAT ARE YOUR RIGHTS?

You have the following rights. You can exercise these rights at any time by contacting the SHEQM. You can make a subject access request verbally or in writing. In order to deal with your request effectively, it would be helpful if you could contact the SHEQM in the first instance.

The SHEQM may be contacted in the following ways:

- By post:
SHEQM, Bradford Watts Ltd. 2 Whitehall Estate, Flex Meadow, Essex, CM19 5TP.
sheqreporting@bradfordwatts.co.uk
- By telephone:
01992 657555 / 07518925390

You have the right:

- To ask us not to process your Personal Data for marketing purposes.
- To ask us not to process your Personal Data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing.
- Where processing of your Personal Data is based on consent, to withdraw that consent at any time.
- To request from us access to personal information held about you.
- To ask for the information we hold about you to be rectified if it is inaccurate or incomplete.
- To ask for data to be erased provided that the Personal Data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding

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legitimate ground for processing, the data is unlawfully processed, the data needs to be erased to comply with a legal obligation.

- To ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the Personal Data is no longer necessary for the purposes for which it was collected, or you exercise your right to object (pending verification of whether there are legitimate grounds for processing).
- To ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data, which is inaccurate, please let us know by contacting us using the contact details above. In the event that you are not satisfied with our processing of your Personal Data, you have the right to lodge a complaint with the relevant supervisory authority, which is the Information Commissioner's Office (ICO) in the UK, at any time. The ICO's contact details are available at: <https://ico.org.uk/concerns/>

WHAT WE ASK OF YOU

Keeping your information accurate and up to date. If your information changes for any reason, for example if you change your name, address, then you should inform us of the change as soon as possible so that we can ensure your information is kept accurate and up to date. To amend and update your information please email: sheqreporting@bradfordwatts.co.uk

Business cards. If you issue business cards to us your data will be processed by those who you share the business cards with. It is reasonably expected that the data will only be processed by those you share it with for business purposes, principally, to contact you in relation to your role and your business.

DEFINITIONS:

Personal Data:

Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, such identifiers including name, location data or online identifier.

Special Categories of Data include:

- reveals racial or ethnic origin.
- political opinions
- religious or philosophical beliefs
- trade union membership.
- genetic data.
- biometric data for the purpose of uniquely identifying a natural person.
- data concerning health.
- data concerning a natural person's sex life.
- data concerning a natural person's sexual orientation.

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CHANGES TO OUR PRIVACY POLICY:

This policy may be updated from time to time. Please contact BWL for any changes.

CONTACT US:

Questions, comments, and requests regarding this privacy policy are welcomed and should be addressed to:

SHEQ-M, Bradford Watts Ltd.

2 Whitehall Estate

Flex Meadow

Essex

CM19 5TP

United Kingdom

or Tel: 01992 657555 / 07518925390.

or by email: sheqreporting@bradfordwatts.co.uk

F. Pimley:
SHEQ Manager



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