

MASTER PRIVACY POLICY

Morgan Sindall Group plc and all of the companies within its group are committed to protecting and respecting your privacy.

Many of our group companies operate their own websites independently, but will refer to this central privacy policy to provide more information to you about the basis on which any personal data they collect from you, or that you provide to them, will be processed by them. Each group company may provide additional notices to you on its website ("**site**") about its data protection and information security practices, and this privacy policy should be read in conjunction with those notices, together with the group company's website terms of use.

In this privacy policy, the terms "**we**", "**our**", "**us**" are used to refer to the relevant group company. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

INFORMATION WE MAY 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 by filling in forms on our site, or by corresponding with us by phone, e-mail or otherwise and includes information you provide when you register to use our site, subscribe to our services, use the services provided by our site, when you provide us with information requested by us for the verification of your identity, and when you report a problem with our site. The information you give us may include your name, address, e-mail address, phone number and any comments or information you provide.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.

By collecting this information we ensure that content from the site is presented in the most effective manner for you and for your computer.

HOW WE USE YOUR INFORMATION

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
 - to carry out our obligations arising from any agreements entered into between you and us and to provide you with the information, products and services that you request from us;
 - to send you a welcome email to verify your account when you register with the site and other emails for the purposes of providing any services, products, competitions or promotions to you, including in relation to account management or system maintenance;
 - to provide you with marketing information about other services or products we offer that are similar to those that you have already enquired about, or services or products you have consented to receiving on the site; and/or
 - to notify you about changes to our services and/or products.

- **Information we collect about you.** We will use this information:
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our site, when you choose to do so;
 - as part of our efforts to keep our site safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you were permitted; and/or
 - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

USING YOUR INFORMATION IN ACCORDANCE WITH DATA PROTECTION LAWS

Data protection laws require that we meet certain conditions before we are allowed to use your data in the manner described in this privacy policy. We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. To use your personal data, we will rely on two conditions, depending on the activities we are carrying out:

- **Consent:** We may provide you with marketing information about our services or products where you have provided your explicit consent for us to do so. More detailed information about the way in which we will use your personal data for these purposes is set out on our site.
- **Legitimate interests:** To use your personal data for any other purpose described in this privacy policy, we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services to you more effectively. Effectively, this requires us to carry out a balancing test of our interests in using your personal data (for example, in order to provide you with the information, products and services that you request from us), against the interests you have as a citizen and the rights you have under data protection laws (for example, to not have your data sold to third party marketing companies without your knowledge, or store your personal data in insecure or unstable countries or regions). The outcome of this balancing test will determine whether we can use your personal data in the ways described in this privacy policy (except in relation to marketing, where we will always rely on your explicit consent). We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

There is no obligation upon you to provide us with any information. If you provide information to us we be better able to provide any products information or services.

HOW LONG WE KEEP YOUR INFORMATION FOR

When your data is no longer required for the purposes listed above, we will delete it as soon as possible but, in any event, within 15 years.

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with any member of the Morgan Sindall Group of companies, which means Morgan Sindall Group plc, its subsidiaries, and its ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 ("**MS Group**").

We will only disclose your information to:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- members of the MS Group and third party suppliers and service providers for the purposes listed under **HOW WE USE YOUR INFORMATION** above;
- selected third parties so that they can contact you with details of the services that they provide, where you have expressly opted-in/consented to the disclosure of your personal data for these purposes;
- analytics and search engine providers that assist us in the improvement and optimisation of our site and other selected third parties; and
- law enforcement or fraud prevention agencies, as well as our legal advisers etc.

We will disclose your personal information to third parties:

- 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;
- if we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- in order to enforce or apply our website terms of use;
- to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements, or otherwise for the prevention or detection of fraud or crime.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the processing of your payment details and the provision of support services. We will take reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

You have a number of rights under data protection law in relation to the way we process your personal data. These are set out **below**. You may contact us using the details on our site (or by contacting us directly – details **below**) to exercise any of these rights, and we will respond to any request received from you within one month from the date of the request.

Please address any questions, comments and requests regarding our data processing practices to gdpr@morgansindall.com.

NUMBER	DESCRIPTION OF RIGHT
Right 1	A right to access personal data held by us about you.
Right 2	A right to require us to rectify any inaccurate personal data held by us about you.
Right 3	A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).
Right 4	A right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.
Right 5	A right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation, at your request.
Right 6	A right to object to our processing of personal data held by us about you (including for the purposes of sending marketing materials to you).
Right 7	A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products).

On occasion we are required to report certain diversity statistics. In order to do this we may undertake automated profiling. We do not store this information.

If you have any concerns regarding our processing of your personal data, or are not satisfied with our handling of any request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is:

**First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF**

CHANGES TO THIS PRIVACY POLICY

Any changes to this privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this privacy policy