

### Introduction and Scope

Decimo Project Engineering is committed to keeping personal information accurate and private. This Privacy Notice, together with any terms of use of our website and systems, sets out what personal information we collect directly from you, through our website or through any other form of communication with us, or which you communicate to our agents or contactors. Protecting the security and privacy of your personal data is important to us; therefore, we conduct our business in compliance with applicable laws on data privacy protection and data security.

This Privacy Notice applies to personal information we handle about our business partners, employees, staff, visitors to our website, individuals who access our sites/premises and other members of the public based in the European Union (EU) only.

## Applicable privacy laws

The relevant data privacy law governing this Privacy Notices is the EU General Data Protection Regulation 2018. To the extent that the relevant data privacy law(s) are amended, substituted or repealed from time to time then this Privacy statement should be read as referring to those relevant data privacy law(s) as so amended, substituted or repealed.

# **Commitment to Data Privacy Protection**

Decimo Project Engineering along with, as applicable, its subsidiaries, provides this Privacy Notice to help you understand how we collect, use and disclose information, including personal information that you may provide to us or that we may obtain as you use and access our website. We may update this Privacy Notice from time to time, so please check back here periodically. This Privacy Notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be process by us, including:

- How Decimo Project Engineering uses the personal information you share with us and that we learn about you because of our relationship when you use the Site.
- What personal information, if any, Decimo Project Engineering may share about you and the conditions we use to protect your information if it must be shared that has been collected through the Site.
- Other things you should know about privacy and Decimo Project Engineering.
- "Personal Information" includes information that alone or when in combination with other information may be used to readily identify, contact, or locate you or a specific individual.

### How and why we collect your personal data

We only collect personal information that is necessary for us to manage our business effectively, to develop and promote our services and to assist us with complying with our legal and regulatory obligations. We process personal information for carefully considered and specific legitimate business purposes, which are in our interests and enable us to enhance the services we provide, but which we believe also benefit our customers.



Generally, we try to collect personal information directly from you but, occasionally, we may collect personal information from public available records, third parties and/or other sources. We will only collect personal information about you from publicly available records, third parties and/or other sources if there is a lawful basis or we gain consent from yourselves to do so.

We will only collect sensitive information about you if we have your consent or we are permitted or required by law to collect the information. If we receive your personal information and we did not request it, then we will determine, within a suitable time after receiving that information, whether it is reasonably necessary for us to retain that information and, in the case of sensitive information, whether you consented to the collection. If not, we will de-identify or destroy the information.

Regardless of how we obtain the information, we will take reasonable steps to ensure that you are aware of the way we are collecting the information, any laws requiring the collection, who we usually disclose it to and any consequences for you if we are not provided with the information.

#### Passive information collection

As you navigate through our website or otherwise use our equipment, systems and technology, we may collect information about your computer, including, where available, your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

We use 'cookies' which are small text files placed on your computer by a web page server which may later be retrieved. A cookie enables us to recognise your computer without the need for a fresh request for you to register. The cookies do not allow us to collect personally identifiable information about you.

#### How we use your personal data

We may collect your personal data to enable us to properly operate, manager and administer our business. When you do provide us with personal data, we may use it to respond to your enquiry, process your order, provide you access to specific information or offers and to support our customer relationship with you. We may therefore store and process personal data for the following purposes:

- the management of our employees and staff and workforce in all of our business operations, including management planning and forecasting;
- maintaining effective access, safety and security controls for our sites and premises;
- in order to investigate any allegation or complaint about our practices or conduct;
- to comply with our legal and regulatory requirements, policies and contractual obligations or in cooperation with any governmental authority of any country;
- management of claims, disputes and litigation proceedings arising out of our business operations;
- engaging the services of external consultants, agents, temporary and casual workers and other operatives;



- obtaining credit references and conducting due diligence on individuals or representatives of corporate entities;
- processing and responding to enquiries, allegations or complaints from members of the public;
- maintaining supplier and contractor databases;
- compilation of and access to business contact databases;
- to conduct business processing functions including providing personal information to our related companies, contractors, service providers or other third parties;
- investigation/prevention/detection/prosecution of unlawful or inappropriate activities;
- establishment and operation of our corporate banking accounts and systems;
- to provide you with information that you request from us;
- to enhance the security of our network and information systems;
- to monitor use of our websites and online services (we may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests).

We may additionally use your personal information for the following purposes, subject to your explicit consent:

- as part of tenders, bids and proposals we submit to clients and potential clients for the provision of works and services;
- to inform you of existing and proposed services which we provide and commercial opportunities which we offer from time to time;
- for personal information that is sensitive information, we will only collect, use or disclose that information where it is reasonably necessary in the operation of our business and we have received your consent to do or it is permitted or required by law;
- as part of our safety and security commitment to our employees and staff, clients and members of the public, we conduct camera, computer and tracking surveillance of our sites, premises, assets and business systems. If we intend to conduct surveillance activities which might affect you, we will give you notice of those activities as we are required under applicable law(s). Any surveillance activity will only be conducted by appropriate individuals and any resulting personal information collected will be held in accordance with this Privacy Statement.
- we may also use your personal information for purposes related to those described above which would reasonably be expected by you or to which you have consented.

Whenever we process data for these purposes we will ensure that we always keep your Personal Data rights in high regard. If you choose not to have your personal data used to support our customer relationship (especially direct marketing or market research), we will respect your choice. We do not sell or otherwise market your personal data to third parties. You may withdraw your consent at any time, by contacting us at any of the following:

# How long we hold onto your personal information

Personal information is only retained for as long as is necessary to fulfil the purposes for which it was collected. We apply a granular retention policy to ensure personal data that is no longer required, out dated, inaccurate or expired is deleted in line with our legal and regulatory



requirements. Where requested by you, we will delete your personal information if we do not have any other legal or regulatory basis for which to retain it (to make requests for deletion please see "how to contact us" below). Please keep in mind that we may continue to retain your information after the conclusion of our business relationship, when that information is reasonably needed to comply with (or demonstrate our compliance with) legal obligations, or reasonably needed for our legitimate business interests.

### Sharing your personal information

We may disclose your personal information in certain circumstances, such as where we are required or permitted by law, where you have consented to us doing so or for any of the purposes for which the information was collected.

The persons to whom we typically may disclose your personal information include:

- specified persons in accordance with a request made by you (for example other employers, banks or property agents);
- our related companies, business partners, contractors, subcontractors, suppliers, consultants, clients and service providers for the purpose of our business operations (only when consented by you);
- individuals or organisations to whom we have commercial relationships, including individuals or organisations engaged in providing us with professional, business, technology, corporate and administrative services which are reasonably required for the effective operation of our business;
- Government agencies (including local tax authorities) and regulators as required or permitted by Law.

Where appropriate, we will only release personal information if we have an appropriate commitment from the recipient to use the information in a lawful, secure and responsible manner and only for the purpose(s) for which it is released.

We will never share your personal information with any unauthorised third parties for any unlawful basis. We will never sell your personal information for financial gain or be irresponsible with personal information collected.

## Access to your personal information

Under GDPR, you have rights as an individual which you can exercise in relation to the information we hold about you. You can read more about these rights here – <u>https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/</u>

# Security of personal information

We store personal information in different ways including in electronic or hard copy form. We will take reasonable precautions in the circumstances to safeguard your information from loss, misuse, interference, unauthorised access, modification, disclosure or destruction. Some of the measures we take include:



- applying technical and organisational controls in response to identified risk. This may include encryption of data at rest and in transit on our systems;
- insisting on confidentiality from our employees, staff and business partners in their use of personal information we provide to them and/or directing them to the principles we apply regarding personal information as identified in our Global Code of Conduct;
- implementing document management controls;
- using access control and security measures for our sites, premises, assets and business systems;
- maintaining our infrastructure to prevent compromise of systems or application containing personal data;
- business continuity planning.

## How to contact us or complain about a breach

Decimo Project Engineering tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate.

This Privacy Notice was drafted with brevity and clarity in mind. If does not provide exhaustive detail of all aspects of Decimo Projects Engineering's collection and use of personal information. However we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you have any questions, comments or wish to make a complaint about the Decimo Project Engineering Privacy Notice, or the way that we have processed your personal information, please click on contact us via one of the following:

Email: info@decimoprojects.com

Mail: Room 5, Ground Floor, Fountain House, Kent DA2 6QH

**Phone:** 0203 862 4955

Online: http://decimoprojects.com

If you feel that we have not adequately dealt with any privacy complaint you have made to us, you may wish to contact the appropriate data privacy authority relevant to your complaint. This is likely to be the Information Commissioner's Office if your concern is in the UK.

## **Changes to this Privacy Notice**

Our Privacy Notice may change from time to time as updated on our website. Before providing us with personal information, please check our website for changes.