

SHEPHERD CONSTRUCTION LIMITED

CUSTOMER PRIVACY NOTICE

1 The Purpose of this Document

- We take your privacy seriously. This notice details your privacy rights and how we gather, use and share personal data about you during and after your relationship with us, in accordance with data protection legislation (including the General Data Protection Regulation (EU) 2016/679 and its implementation into local law).
- It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information. We will update this notice if we make any significant changes affecting how we use your personal data, and if so we will contact you to let you know about the change.

2 About us

- We are what is known as the 'controller' of personal data we gather and use.
- When we say 'we' or 'us' in this notice, we mean Shepherd Construction Limited,
- This notice does not form part of your contract and it may be amended by us at any time.

3 Your Privacy Rights

- You have various rights in respect of the personal data we hold about you – these are set out in more detail below. If you wish to exercise any of these rights, please contact us using the following email address: datacontroller@shepherd-group.com
- **Right to object:** You can object to our processing of your personal data 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. Please contact us as noted above, providing details of your objection.
- **Access to your personal data:** You can request access to a copy of your personal data that we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Consent:** Most of the time, we won't need your consent to use your personal data as we will be using it only to fulfil our obligations and exercise our rights as a supplier. If you have given us your consent to use personal data, you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.
- **Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

- **Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you based solely on automated-decision making. Please note that decisions in respect to you as our customers are not based solely on automated decision-making. We will inform you if this changes and will let you know what categories of data are subject to automated decision-making. Please note that your interaction with us in other ways may include automated decision-making and if that is the case will be as set out in the relevant policy notice governing that relationship.

4 What Kinds of Personal Data we Use

- In the course of our relationship with you, we will collect, store, and use the following categories of personal data about you:
 - your name, work address and work contact details, including email address and telephone number, and job title;
 - your function (e.g. job title, position and name of company);
 - information about you in relation to your project (if you choose to provide it);
 - for customers who are individuals / natural persons, your financial information (i.e. bank account details). Please note that we do not collect any information in relation to your payment information, such as credit / debit card details.

5 How We Gather your Personal Data

- We will obtain your personal data in different ways:
 - directly from you, for example when you contact us by letter, email or telephone and provide your contact details;
 - from monitoring emails, internet and telephone usage and when we use CCTV in line with our IT and Security policy. For further information about our IT and Security policy, please contact us at datacontroller@shepherd-group.com.
 - when you contact us with queries, complaints, comments or praise, or information that you post about yourself on public areas of various social media platforms ("Voluntary Data").
- From time to time, we may also collect some data about you from third parties ("Third Party Data"). This includes:
 - other companies who have obtained your permission to share data with us, such as advertisers or other companies you have bought associated products or services from;

- ;
- We may also collect information about you as follows:
 - information in relation to customers registered on our system collected directly as a result of our relationship with you (e.g. information such as your phone number and email address, collected through conversations and interactions with you).

How We Use your Personal Data

- To summarise, we process your personal data for the following key purposes:
 - primarily, in order to take the necessary steps in preparation of, or to fulfil our obligations under a booking contract to:
 - fulfil orders placed by you;
 - process any other transactions authorised by you

6 Monitoring

- It is necessary for us monitor visitors to our business premises (including our customers) in order to ensure safety and security. We monitor visitors in the following ways:
 - Visitors may be captured by CCTV systems which we use for security purposes (in accordance with our IT and security policy;
- In addition, we may request / and or be provided with CCTV footage obtained by customers or suppliers which captures images of you at a customer or supplier premises. We will not request such footage unless it is necessary for security purposes.
- We only carry out these activities to the extent it is necessary and proportionate and it is permitted by law (please see the Appendix for more information).
- If you have any concerns in relation to monitoring, please contact datacontroller@shepherd-group.com.

7 Customer enquiries

- When contacted with an enquiry, we will hold the entity name and contact details only for the purposes of handling the enquiry.
- Calls made to us may be recorded to protect the interests of all parties. Call records are deleted after 28 days unless needed for on-going actions.

8 Our Legal Basis for Using your Personal Data

- We only use your personal data where it is permitted by the laws that protect your privacy rights. To find out more about the legal bases we rely on to use your personal data, please see the Appendix.
- We do not need your consent to use your personal data where the law otherwise allows us to use it. In limited circumstances, we may approach you for your consent to allow us to process certain personal data. If we do so, we will provide you with full details of the

information that we would like and the reason we need it, so that you can consider whether you wish to consent. You may withdraw your consent at any time.

9 Sharing your Personal Data With Others

- We will share your personal data with third parties where required by law, or where it is necessary to administer the working relationship with you or where we have a legitimate interest. We will only share your personal data to the extent needed for those purposes.
- We share personal data for these purposes with:
 - third-party service providers (including analytics companies and cloud providers), which are available by contacting datacontroller@shepherd-group.com, who help us to manage our customer database and enquiry forms process;
 - other service providers such as information security service providers who help us to manage our IT systems and ensure that they are secure.
- We will also share your personal data with third parties in the following circumstances:
 - where you have specifically consented to us sharing your data with a particular third party;
 - where we are required or permitted to do so by law or to protect or enforce our rights or the rights of any third party.
- We may also share your personal data with our Group Companies, when you are registered as a customer on our system, to allow us to fulfil our contract with you and for internal business purposes (such as business improvement and customer service).

10 Data Retention

We will hold your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal and regulatory requirements.

For further information in relation to specific retention periods please contact datacontroller@shepherd-group.com

11 Transfers Outside the UK

We will not transfer your data to countries outside the European Economic Area. However in certain instances the third parties to whom we share your data may do so as part of their services to us. In the event that your personal data is shared transferred outside the EEA, we will ensure that adequate safeguards are in place to protect your personal data in accordance with data protection legislation.

12 Right to Complain

You can make a complaint to us by contacting us via datacontroller@shepherd-group.com or to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.

13 How can you contact us?

If you have any queries about this Privacy Policy and/or our processing of your data, or you would like to exercise any of the above rights, you can get in touch with our Data Protection Officer by emailing datacontroller@shepherd-group.com

14 Keeping You Up to Date

We reserve the right to change this notice at any time. The latest version of this notice will always be available by emailing datacontroller@shepherd-group.com but where we make any substantial changes which affect your rights, we will notify of these changes via email.

APPENDIX

	Purpose for Processing	Categories of Personal Data	Legal Basis
1.	To fulfil orders placed by you and to process any other transactions authorised by you	Your name, work address and work contact details, including email address and telephone number, and job title	In order to take the necessary steps in preparation of, or to fulfil our obligations under a booking contract and to exercise our legal rights
2.	To undertake product or customer research and development	Your name, work address and work contact details, including email address and telephone number, and job title	In our legitimate interest to improve our services