

# **Privacy Policy**

#### **Definitions**

**Controller:** the person or organisation that determines when, why and how to process Personal Data. It is responsible for establishing practices and policies in line with the GDPR. We are the Controller of all Personal Data relating to our Company Personnel and Personal Data used in our business for our own commercial purposes.

**Data Subject:** a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.

**Data Protection Officer (DPO):** the person required to be appointed in specific circumstances under the GDPR. Where a mandatory DPO has not been appointed, this term means a data protection manager or other voluntary appointment of a DPO or refers to the Company data privacy team with responsibility for data protection compliance.

**EEA:** the 28 countries in the EU, and Iceland, Liechtenstein and Norway.

**Explicit Consent:** consent which requires a very clear and specific statement (that is, not just action).

**General Data Protection Regulation (GDPR)**: The General Data Protection Regulation ((EU) 2016/679). Personal Data is subject to the legal safeguards specified in the GDPR.

**Personal Data:** any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Special Categories of Personal Data and Pseudonymised Personal Data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

#### Introduction

G3 Architecture Limited trading as G3 Architecture (G3) is committed to ensuring that when we collect and use information about visitors to our website we do so in accordance with applicable and relevant data privacy laws.

This Privacy Policy explains how we may use information that we obtain about you through your use of our website. You do not have to give us any information in order to use our website. However, we may need to collect certain details from you if, for example, you want to apply for employment or instruct us in connection with a project.

We adhere to the principles relating to Processing of Personal Data set out in the GDPR which require Personal Data to be:

- (a) Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency);
- (b) collected only for specified, explicit and legitimate purposes (Purpose Limitation);
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation);
- (d) accurate and where necessary kept up to date (Accuracy);
- (e) not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation);
- (f) Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality);
- (g) not transferred to another country without appropriate safeguards being in place (Transfer Limitation); and
- (h) made available to Data Subjects and allow Data Subjects to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests).

The DPO is responsible for overseeing this Privacy Standard and, as applicable, developing Related Policies and Privacy Guidelines. That post is held by Michael Greve who can be contacted at mgreve@g3architecture.co.uk

Please contact the DPO with any questions about the operation of this Privacy Standard or the GDPR or if you have any concerns that this Privacy Standard is not being or has not been followed. In particular, you must always contact the DPO in the following circumstances:

- (i) if you are unsure of the lawful basis which you are relying on to process Personal Data (including the legitimate interests used by the Company);
- (j) if you need to rely on Consent and/or need to capture Explicit Consent;
- (k) if you need to draft Privacy Notices;
- (I) if you are unsure about the retention period for the Personal Data being Processed;
- (m) if you are unsure about what security or other measures you need to implement to protect Personal Data;
- (n) if there has been a Personal Data Breach;

- (o) if you are unsure on what basis to transfer Personal Data outside the EEA;
- (p) if you need any assistance dealing with any rights invoked by a Data Subject;
- (q) whenever you are engaging in a significant new, or change in, Processing activity which is likely to require a DPIA or plan to use Personal Data for purposes other than what it was collected for;
- (r) if you plan to undertake any activities involving Automated Processing including profiling or Automated Decision-Making;
- (s) if you need help complying with applicable law when carrying out direct marketing activities; or
- (t) if you need help with any contracts or other areas in relation to sharing Personal Data with third parties.

# **Privacy Policy**

This Privacy Policy sets out the basis on which G3 processes your personal data.

# Scope of our Privacy Policy

This Privacy Policy applies generally and to our website and any other website created or hosted by us from time to time on which this Privacy Policy appears, or on which a link to this Privacy Policy is provided.

## How we collect your personal data

Your personal data may be collected by us in a number of ways, including:

Through our provision of services to you, or the organisation you represent;

- during the course of dealings with you for or on behalf of a client;
- when you provide us with information in relation to your attendance at any event;
- when you provide information to us for example by filling in forms on this web site;
- when you contact us, for example, to enquire about our services;
- when we collect publicly available information about you or your business (including through electronic data sources); and
- when we collect your personal data from our other clients, consultants, suppliers and other advisers.

# The type of personal data that we may collect shall include and not be limited to

The categories of your personal data that we may collect includes the following:

 Contact details (for example names, postal addresses, email addresses and telephone numbers);

- Professional information such as project rolls and employment history, and professional experience and qualifications;
- Where you provide the information to us, information concerning your interests both business and personal;
- Details regarding your attendance at our events,
- Details of your visits to our website including, but not limited to, traffic data, location data, and web logs;
- Images captured by our office cameras (including CCTV) and images or footage for office or project promotions

## Use of personal information

We process personal information about you for the following purposes:

- To provide you with information and services that you request from us or which we feel may interest you as permitted under applicable law;
- To improve the content and methods of delivery of our website;
- To maintain and develop our relationship with you;
- For research, planning, service development, security or risk management;
- To carry out services we have agreed to provide to you;
- To allow you to use or access secure areas of our website;
- To comply with legal and professional obligations; and
- To disclose your information as set out below.

Personal data must be Processed lawfully, fairly and in a transparent manner in relation to the Data Subject.

You may only collect, Process and share Personal Data fairly and lawfully and for specified purposes. The GDPR restricts our actions regarding Personal Data to specified lawful purposes. These restrictions are not intended to prevent Processing, but ensure that we Process Personal Data fairly and without adversely affecting the Data Subject.

The GDPR allows Processing for specific purposes, some of which are set out below:

- (a) the Data Subject has given his or her Consent;
- (b) the Processing is necessary for the performance of a contract with the Data Subject;
- (c) to meet our legal compliance obligations;
- (d) to protect the Data Subject's vital interests;
- (e) to pursue our legitimate interests for purposes where they are not overridden because the Processing prejudices the interests or fundamental rights and freedoms of Data Subjects. The purposes for

which we process Personal Data for legitimate interests need to be set out in applicable Privacy Notices; or

You must identify and document the legal ground being relied on for each Processing activity.

#### Marketing

You have the right to ask us not to process your personal information for marketing purposes. When we collect contact information from you (for example, when you provide us with your business card or when you are the person instructing us on behalf of your employer), we may add your details to our contacts database and to our mailing lists. You can exercise the right at any time by sending us an email to mgreve@g3architecture.co.uk.

#### Cookies

We may use 'cookies' to identify you when you visit our website to build a demographic profile. A 'cookie' is a small piece of information sent by a web server to a web browser, which enables the server to collect information back from the browser. 'Cookies' are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser.

We will not cross-match information collected through 'cookies' with other personal information to determine who you are or your e-mail address. However, if you disable 'cookies' you may not then be able to access all functions of our website.

## Transfer and use of your personal information

We do not sell on or rent out the information collected via our website, or otherwise provided to us.

We may disclose your information to third parties in the following circumstances:

- We are under a legal, regulatory or professional obligation to do so (for example, in order to comply with anti-money laundering requirements);
- You have consented to us sharing your information in this way;
- It is relevant in the circumstances to disclose the information to our website service providers such as hosting, storage fulfilment and disaster recovery, subject to appropriate technical systems and on a limited use basis only;
- If we believe your use of our website has violated or may violate any law, regulation or if we believe you are or may be a threat to safety, security, property, interests or rights of us or others;
- If we use a third-party service provider to provide services that involve data processing, translation, technology, research, banking and payment, client contact, data entry and processing, litigation support, marketing and security services and other similar services;
- In order to investigate or respond to or resolve problems or inquiries or defend our interests (including, but not limited to, professional indemnity insurers, brokers, auditors and other professional advisors).

G3, and some of the third parties with whom we share information, may be located outside your country or the country from which the data is provided. Those countries to which your data may be transferred may not have well developed data protection legislation. However, for the processing of your data we will at all times ensure a data protection level equal to the one in the European Economic Area.

#### The internet

This website may, from time to time, contain links to other websites which are outside of our control and are not covered by this Privacy Policy. We do not accept any responsibility or liability for other sites' privacy policies. If you access other websites using the links provided, please check their policies before submitting any personal information.

# Security

Using the internet to collect and process personal information necessarily involves the transmission of information on an international basis. The transmission of information via the internet is not completely secure; any transmission is at your own risk. Although we do our best to protect personal information, we cannot guarantee the security of your information transmitted to this web site or otherwise sent to us electronically. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access.

If you are an employee and/or have a username and password and suspect that someone else may be using them, you should stop using both and notify us immediately.

It is our policy to virus check documents and files before they are posted on any website. However, we cannot guarantee that documents or files downloaded from our website will be free from viruses and we do not accept any responsibility for any damage or loss caused by any virus. For your own protection, you should use virus-checking software when using our website. You must not post or provide to us via any website any document or file which you believe may contain a virus. You must virus check any document or file which you intend to post or provide to us via any website.

#### Your consent

By submitting or providing to us your personal information you consent to the use of that information as set out in this Privacy Policy.

A Controller must only process Personal Data on the basis of one or more of the lawful bases set out in the GDPR, which include Consent.

A Data Subject consents to Processing of their Personal Data if they indicate agreement clearly either by a statement or positive action to the Processing. Consent requires affirmative action so silence, pre-ticked boxes or inactivity are unlikely to be sufficient. If Consent is given in a document which deals with other matters, then the Consent must be kept separate from those other matters.

Data Subjects must be easily able to withdraw Consent to Processing at any time and withdrawal must be promptly honoured. Consent may need to be refreshed if

you intend to Process Personal Data for a different and incompatible purpose which was not disclosed when the Data Subject first consented.

When processing Special Category Data or Criminal Convictions Data, we will usually rely on a legal basis for processing other than Explicit Consent or Consent if possible. Where Explicit Consent is relied on, you must issue a Privacy Notice to the Data Subject to capture Explicit Consent.

You will need to evidence Consent captured and keep records of all Consents in accordance with Related Policies and Privacy Guidelines so that the Company can demonstrate compliance with Consent requirements.

## Access to, updating and correcting your information

The privacy law gives individuals the right to access and amend their personal information. If you would like to request a copy of your information or would like to change the information we hold about you, please contact us.

We want to ensure that your information is accurate and up to date. If any of the information that you have provided to us changes, for example if you change your email address or name, please let us know the correct details by sending an email to your G3 contact or to mgreve@g3architecture.co.uk.

You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

## This privacy policy

We may need to revise this Privacy Policy in future. If we change our Privacy Policy, we will post the changes on this page so that you may be aware of the information we collect and how we use it at all times. This Privacy Policy was last updated in April 2019. You should therefore review this page regularly to ensure that you are aware of any changes to its terms. If you have any questions about this Privacy Policy, please contact mgreve@q3architecture.co.uk.