

4.17 DATA PROTECTION POLICY

1. General Statement

It is our policy to conduct all of our business in an honest, responsible manner and we understand that your privacy is important to you and that you care about how your personal data is used. We respect the privacy of all of our customers, staff and contacts. We will only collect and use personal data in ways that are described here and in a way that is consistent with our obligations and your rights under the current law.

2 What is Personal Data?

Personal data is defined by the General Data Protection Regulation (GDPR) as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. Personal data is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data and other online identifiers. The personal data that we use is set out below.

3. What Personal Data do we collect?

We may collect some or all of the following personal data. If you do not allow us to collect this data then we may not be able to fulfil our contractual or legal requirements:

- Name
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession
- Payment information
- IP address and website cookies

4. How do we use your personal Data?

Under GDPR we must always have a lawful basis for using personal data. Our lawful basis is one or more of the following:

- The data is necessary for our performance of a contract with you
- You have consented to our use of your personal data
- It is a legal requirement.
- Providing and managing your account.
- Supplying our services to you and your personal details are required in order for us to enter into a contract with you.
- Communicating with you that may include responding to emails or calls from you.
- Supplying you with information that you have opted-in to (you may unsubscribe or opt-out at any time by following the instructions at the bottom of every communication).
- With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications Regulations and you will always have the opportunity to opt-out

5. How do we store or transfer your personal Data?

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

We may need to share your personal data with the following recipients:

- External accountant / Bankers
- Couriers making deliveries on our behalf
- Contractors working on our behalf

Any data held by the company will be kept secure (physical and digital) and will only be accessed by authorised company personnel. Any data held by the company will not be passed to or accessed/used by any third party without the consent of the individual. The only exceptions are if the company is required to pass data to third parties if required by legislation/regulation. (e.g. The Police, local authorities or Her Majesty's Revenue and Customs (HMRC), the Courts or any other Government Body if lawfully requested and where legally obliged to do so).

6. How long will we keep personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- If you make an enquiry but do not engage our services, we will keep your personal data for 3 months from the date of last communication.
- If you engage our services, we will keep your personal data for 7 years from the date of last communication.

7. What are your rights?

Under the GDPR, you have the following rights:

- The right to be informed about our collection and use of your personal data. This Policy should tell you everything you need to know, but you can always contact us to find out more
- The right to access the personal data we hold about you.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have.
- The right to restrict, i.e. prevent the processing of your personal data.
- The right to object to us using your personal data for a particular purpose
- The right to data portability: this means that if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

8. Further Information

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau. If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

To contact us about anything to do with your personal data and data protection including making a subject access request, please contact our office and ask for the attention of the data protection lead.

We may change this policy for example if the law changes or if we change our business in a way that affects personal data protection. Any changes will be made available in the latest version of this document, which is always available from our website.

The effectiveness of this policy will be reviewed by the Management Review Process

This policy will be regularly reviewed (minimum annually).
Signed on behalf of LandPro Contractors Limited

Ralph Schafer
Managing Director
February 2021