



Data Privacy Notice

Willmott Dixon & Associated Companies



This privacy notice sets out how we handle the personal information of our Customers, Supply Chain Partners, Job Applicants, those who are visiting our website and anyone else where we would be processing personal information in line with data protection legislation.

It is important to read this privacy notice together with any other privacy or fair processing notices we may provide from time to time.

DATA PROTECTION OFFICERS

As a Data Controller we have appointed a divisional Data Protection Officer who is responsible for overseeing compliance with this policy for the following companies:

- Willmott Dixon Holdings Limited
- Willmott Dixon Limited
- Willmott Dixon Construction Limited
- Willmott Dixon Interiors Limited
- WPHV Limited
- Be Living Holdings Limited

The divisional Data Protection Officer for these organisations is:

Company Secretary

Willmott Dixon Holdings Limited
Suite 201, The Spirella Building
Bridge Road
Letchworth Garden City
Hertfordshire
SG6 4ET

Tel: 01462 671852

E-mail: data.protection@willmottdixon.co.uk

THE INFORMATION WE MIGHT HOLD

The information could be a mixture of personal data and special category data, where special category data is collected it will be treated with strict confidentiality. The data may include information relating to:

- Personal details, including name, title, address, telephone number, bank details, personal email address, date of birth, gender, qualifications;
- Personal Preferences;
- Personal Profile;
- Membership of Organisations and Clubs;
- Employment and evaluation information;
- Medical, Biometric or Health;
- Equality and diversity information;
- Photos and Videos;
- Information about criminal convictions and offences;
- Online and Electronic identities;
- Family and Lifestyle;
- Information about your right to work in the United Kingdom; and
- Financial and other references.

If you do not provide information when requested, it may be necessary for us to exclude you from sites, offices or events and to inform any relevant people. This list is not exhaustive and we may collect other information where necessary.

WHY DO WE COLLECT THIS INFORMATION?

We will process this information in line with Article 6(1) of the GDPR, the basis will include but are not limited to:

- Based on the performance of a contract;
- It is our legitimate interest to do so;
- Pursuant to our legal obligations; and
- To protect the vital interests of you or others.

We may inform you of additional purposes for processing your information when that information is collected from you.

HOW IS YOUR INFORMATION COLLECTED?

We will collect information about from the following sources:

- You;
- Your employer;
- Property owners;
- The disclosure and Barring Service, if appropriate;
- Third party drug and alcohol testing services, if appropriate; or
- Other Third Parties where we may have a contractual relationship or legal obligation to do so.

YOUR DATA PROTECTION RIGHTS

Under data protection law, you have a number of rights. Your rights are dependent on our reasoning for processing your information.

- **Your right to access**
You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions which may mean you do not receive all information we process.
- **Your right to rectification**
You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure**
You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restrict processing**
You have the right to ask us to restrict the processing of your information in certain circumstances.
- **Your right to object to processing**
You have the right to object to processing if we are able to process your information because the process forms part of a public task or is in our legitimate interest.
- **Your right to data portability**
This will apply to information you have given us. You have the right to ask that we transfer information you gave us from one organisation to another, or give it to you. This only applies if we are processing information based on your consent.

You are not required to pay for exercising your rights and we will endeavour to respond within one month.

DATA SHARING

We will not share your information with third parties for the purposes of direct marketing. It may be necessary for us to share information about you to our associated companies or other third parties. Where information is shared with third parties it will only be shared for the purpose it was collected.

Document Name	Ref	Document Owner	Issue No	Effective Date
Willmott Dixon Privacy Notice	CS-GDPR-003	Group Company Secretary	3	January 2021



Additionally, we may disclose your personal information;

- In the defence of legal claims;
- If we choose to exercise a legal power;
- If we are under duty to disclose your personal data for the reasons set out in 'Why do we collect this information?'

DATA RETENTION

We will retain your personal information for as long as is required for the purpose it was collected. It will be kept on secure systems in line with our data retention policy.

AUTOMATED DECISION MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision making in the following instances:

- We have notified you of the decision and given you 21 days to request a reconsideration.
- Where it is necessary to perform the contract with you and appropriate measure are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

PHOTOS & VIDEOS

Where photos and videos can clearly identify an individual, it will be classed as personal data regarding data protection legislation.

From time to time we will take photos and videos at events, to support case studies, for marketing, or for internal reporting. We will always make the effort to notify you of where we will be undertaking photography and the purpose behind it.

It will be managed and retained in line with internal policies and procedures.

Where we operate CCTV at offices and on sites this will be used for security reasons and kept in line with our internal data retention policies.

WEBSITES

When someone visits our website we use a third party, Lead Forensics, to collect standard internet log information and details of visitor behaviour patterns. We do this to maintain and monitor the performance of our website to look to improve the service to the users. We do this under Article 6(1) (f) of the GDPR which allows us for our legitimate interest. This information is only processed in a way in which it does not identify anyone. We do not make, or do not allow Lead Forensics to make any attempt to find out the identities of those visiting the site.

We will also use cookies, you can read how we use them here www.willmottdixon.co.uk/cookie-policy. We will require consent for the optional cookie use which is processing under Article 6(1) (a) of the GDPR.

Where we use certain portals for our business processes and you require a log in for these they will be managed in line with this Privacy Notice and internal policies. If you have any questions in regard to this information please get in touch with data.protection@willmottdixon.co.uk or our DPO.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions.

We have in place the correct procedures to deal with suspected data breaches and if applicable will notify you or the applicable regulator.

We may transfer your data outside the European Economic Area. We will only do this with written consent or the following conditions have been fulfilled:

- To countries approved by the Information Commissioner Office;
- There are the appropriate safeguards in place; and
- We comply with obligations under the data protection legislation by providing an adequate level of protection to any personal data that is transferred.

LINKS TO OTHER WEBSITES

This privacy notice does not cover the links within this site to other websites. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website we encourage you to read their privacy statements.

CHANGES TO THIS POLICY

This policy may be updated from time to time. Please check this page on our website for any changes.

Document Name	Ref	Document Owner	Issue No	Effective Date
Willmott Dixon Privacy Notice	CS-GDPR-003	Group Company Secretary	3	January 2021