

Privacy Policy

This is an important notice regarding your privacy and the way in which **PKB Civils** (referred to as "we", "our" or "us" in this policy) collects and makes use of your personal data. We want to be open and transparent with you, and therefore encourage you to contact us if you have any questions about this policy or the ways in which we use your personal data.

This policy applies to individuals outside of our organisation, for example, applicants for vacancies, customers, employees of our clients and suppliers, and the general public. We take our privacy responsibilities seriously and are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For applicable privacy legislation, the data controller is PKB Civils with its operating office at 80b Rugby Road, Rochdale, OL12 0DY. Questions regarding this policy should be directed to our Data Protection Compliance Manager.

1. WHAT INFORMATION DO WE HOLD ABOUT YOU?

We may collect, store and use personal data about you (referred to throughout this privacy policy as personal information):

Applicants

- Personal contact details such as the name, title, address, telephone number and email address;
- Recruitment information (including, for example, your driving licence, passport or visa information, and other personal information included in an application form, CV or cover letter as part of your application for employment with us);
- Personal information provided to us by our recruitment partners in relation to your application for employment with us;

Employees of our clients and suppliers

 Contact details such as your name, title, business telephone number and business email address.



 Information you provide or we collect during our interactions with you or your employer, such as how long we have done business with you or how long you have worked at your company.

Customers

 Personal details such as your name, title, business telephone and e-mail address and geographical address.

Generally

- Any personal information gathered when you visit our offices via our visitor sign-in process, including your name and vehicle registration.
- Any personal information you provide to us via our website, for example, by using the "Contact us" page on our website.
- Any personal information you provide to us during your interactions with us.
 Information gathered by cookies used on our website. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse and also allows us to improve the way our website works. For detailed information on the cookies we use and the purposes for which we use them please refer to our Cookie Policy at the end of this document.
- Information gathered by our security monitoring and auditing software to create logs of data about the ways that our website is used by those who have login access to it.
- Information gathered by our servers to create logs of data about the ways that our website is used by those who access it.
 Information provided to us by third party service providers we work with, for example, payment service or analytics providers.

2. HOW LONG WILL WE USE YOUR PERSONAL INFORMATION AND WHAT IS THE LEGAL GROUND WE RELY ON FOR DOING SO?

We will only use your personal information when the law allows us to. When we use your personal information, we must have a legal ground for doing so. The following are (amongst others) the legal grounds by which we can use your personal information:

- Where you have provided us with your consent for us to do so.
- Where we need to perform the contract, we have entered into with you or to take steps to enter into a contract with you.
- Where we need to comply with a legal obligation to which we are subject.
- Where it is in pursuit of our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

More specifically, we will use your personal information in the following circumstances:



Applicants:

- To evaluate and progress your application for employment with us to perform the contract with you or to take steps to enter into a contract with you, and in pursuit of our legitimate interests to verify your suitability for our vacancies.
- To keep a record of your application in pursuit of our legitimate interests in the
 event we wish to offer to place you in another role within our organisation.
 To carry out driving licence checks in pursuit of our legitimate interests to verify
 your suitability for our driver vacancies.
- To carry out right to work checks to comply with a legal obligation to which we are subject.

Employees of our clients and suppliers:

- Your contact details in pursuit of our legitimate interests to facilitate business between your organisation and ours.
- Your contact details to provide you with further information on our products and services. This may include technical information and/or marketing information – in pursuit of our legitimate interests (keeping you informed about our products, services and business updates).
- To manage your customer account –in pursuit of our legitimate interests (to facilitate business between your organisation and ours).
 To provide your organisation with our services – in pursuit of our legitimate interests (to facilitate business between your organisation and ours).

Customers

- Your contact details to facilitate your transaction or proposed transaction with us to perform the contract with you or to take steps to enter into a contract with you.
- Your contact details to provide you with information on our products and services –
 to perform the contract with you or to take steps to enter into a contract with you.
 This may also include marketing information where you have provided us with your
 consent for us to do so.
- To manage your customer account to perform the contract with you or to take steps to enter into a contract with you.
- Your personal details and payment information to facilitate your transaction with us

 to perform the contract with you.
- Your personal details and payment information to identify and prevent fraud in pursuit of our legitimate interests (to prevent fraud for you and for us).

Generally:

- Health and safety purposes to comply with a legal obligation.
- To administer our website and for internal operations, including troubleshooting, data analysist, testing, research, statistical and survey purposes in pursuit of our legitimate interests (to better understand how people interact with our website and solve any issues it may have).



- To improve our website to ensure that content is presented in the most effective manner for you and your computer in pursuit of our legitimate interests (to improve our content and your experience).
- To secure our website and the data processed by it in pursuit of our legitimate interests (for the prevention, investigation, mitigation and remediation of alleged security breaches).
- To transfer to third party service providers in pursuit of our legitimate interests (outsourcing for effectiveness and efficiency).
 To contact you if we wish to use your personal information for a purpose not set out in this policy – to comply with a legal obligation.

3. WHAT HAPPENS IF THERE IS A CHANGE OF PURPOSE?

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

4. WHICH TYPE OF THIRD PARTIES MIGHT WE SHARE YOUR PERSONAL INFORMATION WITH?

We require third parties to respect the security of your personal information and to treat it in accordance with the law. For example, where we instruct third party service providers, we carry out due diligence on those providers to ensure they treat your personal information as seriously as we do.

We may share your personal information with the following types of third parties:

- Technical support providers, for example, assisting us with our website.
 Recruitment partners assisting us with employment related matters, for example, recruitment agencies and job boards.
- Professional advisers such as lawyers, accountants and business analysts.
- Providers which assist us in assessing your suitability for employment, for example, providers who facilitate online testing.
- Providers who assist us in our disaster recovery procedures, for example, back up centres.
- Providers which help us collate and organise information effectively and securely.
- Providers which help us with logistics and delivery solutions.
 Third party software hosting companies which provide us with software solutions such as our customer relationship management system.
- Providers which host our servers in their data centres (these are all within the UK).
- Providers assisting us with payment and fraud prevention solutions.
- Providers assisting us with human resources, payroll and pension services
 Our group companies.



5. DATA RETENTION

- How long will you use my personal information for?
- We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for.
- We assess the appropriate retention period for different information based on the size, volume, nature and sensitivity of that information, the potential risk of harm to you from unauthorised use or disclosure of that information, the purposes for which we are using that information, applicable legal requirements for holding that information, and whether we can achieve those purpose(s) through other means.

Applicants

 Where your application for employment with us is successful, we will provide further information during the course of your employment as to how we use your personal information.

Employees of our clients and suppliers

- Where we have collected your personal information during the course of your and our organisations doing business, we will keep your information for as long as this business carries on, or for as long as we have a commercial interest in holding your personal information, for example, with a view to doing business in the future.
- Where you use our website and one of our cookies are activated, that cookie will
 operate for the duration set out in our Cookie Policy at the end of this document.

Customers

 Where we have collected your personal information during the course of your and our organisations doing business, we will keep your information for as long as this business carries on, or for as long as we have a commercial interest in holding your personal information, for example, with a view to doing business in the future.

Generally

- Where you use our website and one of our cookies are activated, that cookie will
 operate for the duration set out in our Cookie Policy at the end of this document.
- Any information collected for security purposes is stored only for as long as needed
 for the purposes stated above, which is not normally longer than two years. If you
 wish to find out more information about our security data retention periods, please
 contact our Data Protection Compliance Manager using the details listed at the
 beginning of this privacy policy.

6. ANY PERSONAL INFORMATION COLLECTED THROUGH OUR CONTACT US SERVICE IS RETAINED FOR 6 MONTHS ONLY.



Where we store your personal information

Electronic versions of your personal information are stored on our servers which are currently located in England within the UK and on our backup servers for disaster recovery purposes which are also stored in England within the UK. Should you require further information on this you can contact the Data Protection Compliance Manager using the email address provided above. We have taken steps to ensure any third-party processors assisting us with processing your personal data respect your personal information and treat it in accordance with the law.

Electronic versions of your personal information obtained through our website are stored on our website servers which are currently located in London in the UK and on our backup servers for disaster recovery purposes which are currently in Ireland. We have taken steps to ensure any third-party processors assisting us with processing your personal data respect your personal information and treat it in accordance with the law.

[We also use cloud hosting solution providers to assist us with storing and processing your personal information. Where their servers are based outside of the EEA (European Economic Area), we have taken steps to ensure your personal information is adequately protected and the transfer is lawful. For example, by putting place the standard contractual clauses which allow for the transfer of personal information outside of the EEA.

7. RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

Your rights in connection with your personal information Under certain circumstances, by law you have the right to:

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- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal



- information, for example if you want us to establish its accuracy or the reason for processing it.
- o Request the transfer of your personal information to another party.
- If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer in writing using the contact details set out at the beginning of this privacy policy.

8. NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

9. WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to another person who has no right to receive it.

10. MARKETING

Where we are providing you with marketing information, you can also change your marketing preferences by using the unsubscribe button at the bottom of our marketing emails to you.

11. WHAT HAPPENS IF YOU FAIL TO PROVIDE PERSONAL INFORMATION?

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing you with our products or services), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of visitors to our offices).

12. CHANGES TO THIS PRIVACY NOTICE

We may change, modify, add or remove portions of this privacy policy at any time, and any changes will become effective immediately.

Any changes we make to our privacy policy will be posted on this page and, where appropriate, notified to you.