

# PRIVACY POLICY

Policy Owner: Chief of Staff

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#### Purpose

Dalcour Maclaren Limited is a Private Limited Company providing services to the Utilities and Infrastructure sectors.

This privacy notice sets out how Dalcour Maclaren uses and protects any information that you give Dalcour Maclaren either directly, via our website or through another media including email.

Dalcour Maclaren is committed to protecting your personal information. Should we ask you to provide certain information, by which you can be identified, then you can be assured that it will only be used in accordance with this privacy notice.

We will only collect and retain personal data where it has been specifically provided by you or where it has been obtained from publicly available open sources and we require to process it in conjunction with our client contract requirements, or where you have provided it to us in order to benefit from a better service and details of our services more generally, through the provision of newsletters or other promotional material.

#### **Data Security**

All information held by us is stored on secure servers and we are committed to protecting your personal data. We use strict procedures and security features to try to prevent unauthorised access.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

We may hold and process the following data about you:

#### Information you give to us

This is information about you that you give us by filling in forms physically or on our own website; or by corresponding with us by phone, e-mail or otherwise and may include the following:

- Name and job title
- Contact information including email address
- Address information including postcode
- Financial and bank account information
- Other information relevant to client specific projects

#### Information we collect throughout our relationship

This is information relating to ongoing tenancies such as rent payment and details required to undertake our service effectively.



#### Information we collect from other sources

We are working closely with other organisations and also enquire with third parties who hold information relating to property transactions, such as HM Land Registry.

#### What is the legal basis of processing your data?

The legal basis for Dalcour Maclaren processing your personal data in relation to our client contracts is 'legitimate interest' as defined by Article 6 of the General Data Protection Regulations. Where you have provided your personal data to us then this would be a 'consent' basis for lawful processing. Where you have provided, or we have obtained your data to undertake our legal and contractual requirements we may rely on 'contract or 'legal obligation' as our basis for lawful processing.

#### What do we do with the information we process?

We use this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping
- Where relevant, we may use the information to improve our services
- Where you have requested it, we may periodically send emails about our services or other information which we think you may find interesting using the email address which you have provided.
- Where we are processing information in relation to client contracts, we are processing
  the data on behalf of our clients and as such may be required to share or pass such
  information on to them, or their approved contractors, strictly in connection with this
  purpose.

## How long do we keep hold of your information?

- We will keep your information for as long as it is necessary for the purpose it was collected
- We will delete personal data gathered in relation to specific client contracts in accordance with these contract requirements, which in some instances may be up to 6 or 12 years after completion of the contract unless:
  - o Obligations to our regulators require otherwise
  - o We require the data in relation to a related claim
  - o For legal or legislative purposes
  - We are required, or reasonably requested, to remove such data from our records and we are legally and contractually able to comply



#### With whom might we share your information?

We will only share your personal data with third parties where we have a legal or contractual requirement to do so, this may include:

- Our clients and their approved sub-contractors
- Our approved sub-contractors where they are undertaking work in the course of the fulfilment of contractual obligations, we have with our clients
- Where we are under a duty to disclose or share your personal data in order to comply
  with any legal obligation, or in order to enforce or apply our terms of use and other
  agreements; or to protect the rights, property or safety of our customers, our regulator
  or others. This includes exchanging information with other companies and
  organisations for the purposes of fraud protection and prevention of money laundering

Where we are sharing your data, this will only be transferred once it has been encrypted prior to transfer.

#### How we use cookies on our website

We use cookies on our website to manage the operation and performance of our sites. Cookies are small data text files that are placed on your computer when you visit a website. Cookies help to make websites work efficiently and provide us with information about how our website is used. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

#### Links to other website

Our website may contain links to other websites. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.



#### Controlling your personal information- what are your rights?

Where the processing of your personal data is based on consent, you can withdraw that consent at any time.

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on our website, you are consenting to us using and retaining this information for the purpose as set out
- If you have previously agreed to us using your personal information, you may change your mind at any time by emailing us at info@dalcourmaclaren.com
- If you wish to update your contact information or comment on our website, please do so by emailing us at info@dalcourmaclaren.com
- To ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing
- To ask for your personal data to be deleted, provided that
  - the personal data is no longer necessary for the purposes for which it was collected
  - o you withdraw your consent, if the legal basis for processing is consent
  - you exercise your right to object and there are no overriding legitimate grounds for processing
  - o the data is unlawfully processed
  - o the data needs to be erased to comply with a legal obligation
  - the data is children's data and was provided and or processed in error or without knowledge of the data subjects' status
- To ask for the processing of personal data to be restricted if:
  - the processing is unlawful
  - the processing is no longer necessary for the purposes for which it was collected
  - o you exercise your right to object (pending verification of whether there are legitimate grounds for processing)
  - o to ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract (which means that you have the right to obtain your personal data for your own purposes, in a commonly used electronic format, such as a csv file).



We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. You may request details of personal information which we hold about you by submitting a subject access request under the General Data Protection Regulation. We will return this information within a one month following a valid request and only after your identity has been verified. If you would like a copy of the information held on you, please write to **The Barn, Bignell Park Barns, Chesterton, Bicester OX26 1TD** or email us at **info@dalcourmaclaren.com**.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

#### Complaints

Individuals have a right to complain to the Information Commissioners Office (ICO) if you believe that there is a problem with the way that we are handling your personal information. We request that you first bring any complaint to our attention before contacting the ICO so that we may take appropriate action to resolve the issue.

#### Accessing your personal information

You have the right to a copy of the information we hold about you. You may make an access request by writing to:

Data Protection Officer, Dalcour Maclaren, The Barn, Bignell Park Barns, Chesterton, Bicester OX26 1TD, or by sending an e-mail to info@dalcourmaclaren.com. Any access request will be processed as required by law and will be free of charge.

### Complaints procedure

If you are dissatisfied with any service provided by Dalcour Maclaren Ltd, you can make a complaint through our formal complaints procedure which complies to our regulated bodies.

If you wish to make a complaint, please e-mail info@dalcourmaclaren.com or write to us at The Barn, Bignell Park Barns, Chesterton, Bicester OX26 1TD to request a copy of our procedure.

Dalcour Maclaren may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

For queries relating to **Dalcour Maclaren Ireland, Block 3, Harcourt Centre, Harcourt Road, Dublin 2, DO2 A339, Ireland**, please email **info@dalcourmaclaren.com**.

# Contact

Dalcour Maclaren HQ T 0333 188 5310 E info@dalcourmaclaren.com

The Barn, Bignell Park Barns Chesterton, Bicester Oxfordshire OX26 1TD

