

Parkwood Project Management Limited

Privacy Policy

This document explains how we use your personal data.

We are committed to ensuring the privacy of all individuals whose personal data we collect, hold, and process. Such individuals may include end users of our services, employees of our clients and users of our services, visitors to our website, and employees of our suppliers and contractors. In this policy, we explain how we hold, process, and retain your personal data.

Please note that the use of services provided by our Group companies will be subject to their respective privacy policies with full details available on their websites.

1. Who We Are and How to Contact Us

This website (<https://www.ppm-parkwood.co.uk/>) is operated by Parkwood Project Management Limited. We are the data controller responsible for your personal data (unless otherwise stated below, such as when we act as a processor for a main contractor).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out in Section 9.

2. How We Use Your Personal Data

This section provides you with information about:

1. What personal data we hold and process;
2. In respect of personal data that we did not collect from you directly, where we obtained that data from, and what types of data we have collected;
3. The purposes for which we may process your personal data; and
4. The legal grounds on which we process your data.

End Users of Our Services

Contact data. We may process information that you provide to us ("contact data"). This contact data may include your name, address, telephone number, email address, and date of birth, and may be provided to us in person or through our website. We may use this contact data during the course of providing our services, in conjunction with our partners, suppliers, and clients, to you. The legal basis for this processing is for the purposes of performing our contract with you, or in taking steps at your request prior to entering into a contract.

Where you have provided your consent for us to do so, we may contact you regarding the latest promotions and offers regarding our products and services, and those of our partner organisations, and to send you newsletters.

Our Suppliers and Contractors

Supplier data. If you are a sole trader, partnership, or self-employed, we will collect personal data about you such as your name, address, telephone number, email address, and employment details ("supplier data"). We will process this information to ensure the efficient management of our contract and relationship with you (this could include for the purposes of auditing and debt recovery), and the accurate processing of any related correspondence with you. The legal basis for this processing is for the purposes of performing our contract with you, or in taking steps at your request prior to entering into a contract.

We also use your supplier data to understand your service performance and financial stability

for the purposes of supplier monitoring. The legal basis for this processing is our legitimate interests in managing our relationship with you and ensuring that we are able to maintain the quality levels in our service.

The supplier data may also include your card or bank details and the details of any transaction we enter into with you. This supplier data may be processed for the purposes of administering the payment, for the supply of the purchased goods and services from you, and keeping proper records of those payments. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract, and our legitimate interests, namely our interest in the proper administration of our business.

Point of contact data. If you are employed by a supplier of goods, services, or consultancy which has a contractual arrangement with Parkwood for the provision of such services (the "main contractor"), we may use your information such as your name, email address, telephone number, and employment details (the "point of contact data") to enable us to:

- Provide supplier contact details for our multi-site operations;
- Create and maintain project management stakeholder lists;
- Create and maintain contact lists as required; and
- Create and maintain a list of past, current, and potential suppliers to enable us to contact you for business purposes.

We will treat the main contractor as the controller of any point of contact data that we are provided with. We may receive personal data in respect of such points of contact direct from the main contractor. We will process any such personal data strictly in accordance with the instructions of the main contractor, not the individual point of contact, including sharing all such data with the main contractor. The legal basis for this processing is our legitimate interests in receiving products or services from the main contractor, and in managing and administering our relationship and contract with the main contractor.

Shared data. Your data may be shared with the authorities with whom The Parkwood Group or its subsidiary companies and partners are working in partnership, in order to operate and administer our relationship and contract with you, develop our products and services, systems, and relationships with you, understand your requirements, and demonstrate legislative compliance. The legal basis for this processing is our legitimate interests in ensuring that we receive high levels of service from our suppliers and contractors.

Our Business Clients

Point of contact data. If you are employed by one of our corporate clients, which has a contractual arrangement with Parkwood for the provision of services (the "main contractor"), we may use your information such as your name, email address, telephone number, and employment details (the "point of contact data") to enable us to:

- Provide services to you in accordance with the contract that we have with the main contractor;
- Communicate with you regarding the provision of such services;
- Improve the services that we provide and to ensure that we maintain our levels of client care;
- Market our products, services, promotions, and offers to the main contractor; and
- Create contact lists or stakeholder lists for specific projects or activities.

We will treat the main contractor as the controller of any point of contact data that we are provided with. We may receive personal data in respect of such points of contact direct from the main contractor. We will process any such personal data strictly in accordance with the instructions of the main contractor, not the individual point of contact, including sharing all such data with the main contractor. The legal basis for this processing is our legitimate

interests in supplying products or services from the main contractor, in managing and administering our relationship and contract with the main contractor, and in marketing our products and services to the main contractor.

Shared data. Your data may be shared with the authorities with whom The Parkwood Group or its subsidiary companies and partners are working in partnership, in order to operate and administer our services to you, develop our products and services, systems, and relationships with you, understand your requirements, and demonstrate legislative compliance. The legal basis for this processing is our legitimate interests in ensuring that we maintain high levels of service to our members, clients, and other end users of our services.

Complaints

Complaint data. When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint (the "complaint data").

We will only use the complaint data to process the complaint and to check on the level of service we provide or how contracts are performed. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

Similarly, where enquiries are submitted to us, we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide. When we take enforcement action against someone, we may publish the identity of the defendant in our Annual Report or elsewhere. Usually we do not identify any complainants unless the details have already been made public.

We will keep complaint data contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle. The legal basis for this processing is our legitimate interests in dealing with the complaint appropriately and transparently.

Other Processing That We May Carry Out

Website data. We may process data about your use of our website and services ("website data"). The website data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, and website navigation paths, as well as information about the timing, frequency, and pattern of your service use. The source of the website data is our analytics tracking system, Google Analytics. The data collected is kept anonymous. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. This website data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

Enquiry data. We may process information contained in any enquiry you submit to us regarding our products or services ("enquiry data"). The enquiry data may be processed for the purposes of offering, marketing, and selling relevant products and/or services to you. The legal basis for this processing is our legitimate interests in responding to your enquiry appropriately.

Newsletter data. We may process information that you provide to us for the purpose of subscribing to our blog and press releases ("newsletter data"). The newsletter data may be processed for the purposes of sending you newsletters. Where you are a point of contact at one of our corporate customers, the legal basis for this processing is our legitimate interests, namely the marketing of relevant products and services to you. Where you are a member or end user of our services, the legal basis for this processing is consent.

Correspondence data. We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

Payment data. We may process payment information relating to products and services that you purchase from us ("payment data"). The payment data may include your contact details, your card details, and the transaction details. The payment data may be processed for the purposes of administering the payment, for the supply of the purchased goods and services, and keeping proper records of those payments. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract, and our legitimate interests, namely our interest in the proper administration of our website and business.

Other processing activities. In addition to the specific purposes for which we may process your personal data set out above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Failure to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

Automated Decision-Making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

3. Providing Your Personal Data to Others

- Sharing your data with our partners. Your data may be shared with the authorities with whom The Parkwood Group or its subsidiary companies and partners are working in partnership, in order to operate our business and administer and develop our services, and demonstrate legislative compliance. The legal basis for this processing is our legitimate interests in ensuring that we maintain high levels of service to our members, clients, and other end users of our services.
- Social Media Platforms. If you join one of our social media pages, please note that the providers of the social media platforms have their own privacy policies and we do not

accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on our social media pages.

- To our service providers. We may also disclose your personal data to certain reputable third-party service providers, such as cloud and IT services providers and other contractors whose services are required to enable Parkwood to provide its services to clients.
- Our insurers/professional advisers. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice, and managing legal disputes.
- Where we provide your personal data to any third party. Where we share your personal data with any third party, we will ensure this processing is protected by appropriate safeguards including a suitable data processing agreement with that third party.
- Main contractors. We may share personal data with a main contractor as set out in the sections relating to point of contact data above.
- To comply with legal obligations. In addition to the specific disclosures of personal data detailed above, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation we have to comply with, or in order to protect your vital interests or the vital interests of another individual.

4. Transfers of Your Personal Data Outside of the UK/EEA

Where your personal data is transferred outside of the UK or the European Economic Area (EEA), we will ensure that either (a) an "adequacy decision" has been made with respect to the data protection laws of the country to which it is transferred, or (b) we have entered into a suitable data processing agreement with the third party situated in that country (such as Standard Contractual Clauses or the UK International Data Transfer Agreement) to ensure the adequate protection of your data. In all cases, transfers outside of the UK/EEA will be protected by appropriate safeguards.

5. Retaining and Deleting Personal Data

1. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
2. Unless we contact you and obtain your consent for us to retain your personal data for a longer period, we will retain and delete your personal data in accordance with our retention policy. (For instance, complaint files are retained for two years from closure).
3. We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Your Rights

Under data protection laws, you have rights in relation to your personal data:

- Your right to access your data. You have the right to ask us to confirm whether or not we process your personal data and to have access to the personal data, and any additional information (such as purposes of processing, categories of data, and recipients). You may request a copy of your personal data. The first copy will be provided free of charge, but we may charge a reasonable fee for additional copies, or if your request is found to be unfounded or excessive. We will usually require appropriate evidence of your identity.
- Your right to rectification. If we hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the

processing, you also have the right to have any incomplete personal data about you completed.

- Your right to erasure. In certain circumstances you have the right to have personal data that we hold about you erased without undue delay. These circumstances include: it is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected; you withdraw your consent to any processing which requires consent; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. There are general exclusions, including where processing is necessary for compliance with a legal obligation or defending legal claims.
- Your right to restrict processing. You can request restriction of processing where: you contest accuracy; data is processed unlawfully but you oppose erasure; we no longer need the data but you require it for a legal claim; or you have objected to processing and are awaiting verification. Where restricted, we may continue to store your data but will only process it with consent, in relation to legal claims, or to protect rights.
- Your right to object to processing. You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it is necessary for our legitimate interests or those of a third party. If you object, we will stop processing unless we demonstrate compelling legitimate grounds overriding your interests, or the processing is in relation to a legal claim.
- Your right to object to direct marketing. You can object to us processing your personal data for direct marketing purposes. If you make an objection, we will stop processing your personal data for this purpose. You can also instruct us at any time not to process your personal information for marketing purposes.
- Automated data processing (Portability). To the extent that the legal basis we rely on is consent or performance of a contract, and processing is automated, you are entitled to receive your data in a structured, commonly used and machine-readable format, provided it does not adversely affect the rights of others.
- Right to withdraw consent. To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

Exercising your rights: You may exercise any of your rights by written notice to us. We may withhold personal information that you request to the extent permitted by law.

Point of contact Data: The rights stated above shall not apply to data obtained or processed by Parkwood in respect of points of contact in connection with a main contractor. In respect of such data, Parkwood is acting as a processor and the main contractor is the controller.

Points of contact should contact the main contractor directly to exercise their rights.

Complaining to a supervisory authority: If you think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection. In the UK, this is the Information Commissioner's Office (ICO).

7. IP Addresses and Cookies

Cookies are very small text files that are stored on your computer when you visit some websites.

We use cookies to help identify your computer, including where available, your IP address, operating system, and browser type, for system administration so we can keep your activity secure, tailor your user experience, and remember your preferences. This is statistical data and does not identify any individual. You can disable any cookies already stored on your computer or clear your browser storage, but this may result in losing any preferences which you've set previously.

8. Amendments

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy. We may notify you of changes to this policy by email.

9. Our Details

This website is operated by Parkwood Project Management Limited.

We are registered in England and Wales under registration number 03330400.

Our registered office is at: The Stables Duxbury Park, Duxbury Hall Road, Chorley, England, PR7 4AT.

You can contact us:

- by post, using the postal address given above;
- by email, using the email address published on our website.