

# DATA PROTECTION AND PRIVACY POLICY

## **This policy**

This is the McLaren Construction Limited and McLaren Property Limited (“**McLaren Group**”) (we/us/our) data protection and privacy policy that explains who we are, why and how we process your personal information (also referred to here as personal data) and **your rights** and how to **contact us** if you need to.

Our **contact details** are set out at the end of this policy. We are the controller in relation to the personal data processed in accordance with this policy (except where this policy explains otherwise).

This policy and any other documents referred to on it sets out:

- Information we collect about you
- Cookies and other technologies
- How we use your information
- Our promotional updates and communications
- Who we give your information to
- Where we store your information
- Payment processing
- How we protect your information
- How long we keep your information
- Your rights
- Changes to this policy
- Contact us

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

## **Information we collect about you**

We may process your personal data if:

- You or the company you work for are a customer or a supplier of ours.
- You or the company you work for use our products or services.
- You work for a customer or a supplier of ours, or for someone who uses our products or services.
- You are someone (or you work for someone) to whom we want to advertise or market our goods or services.

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### **Information we collect from you or from a third party**

We may process your personal data that we have either obtained from you, or obtained from somewhere else. Personal data which is not collected directly from you may be collected:

- From your employer in connection with your job and how it relates to us.
- If you use any websites operated by us.

Personal data relating to you that we process may include:

- Your name.
- Who you work for, and your job function or department.
- Your address, phone number, email address or other contact details (these details may relate to your work or to you personally, depending on the nature of our relationship with you or the company that you work for).
- Information about you that you give us by communicating with us by phone, by e-mail, via our website, via social media or otherwise. It includes information you give us or that we obtain when you use our website, obtain our goods or services, supply us with goods or services, enquire about a product, promotion or survey, or contact us to report a problem, or do any of these things on behalf of the person that you work for.
- Information relating to transactions with us involving you or the company you work for (for example, details of goods or services that we have supplied to, or obtained from, you or the person you work for).
- Other information relating to you which it is necessary for us to process in order to enter into or perform a contract with you or the company you work for (for example, right to work information and information obtained from credit references agencies where this is necessary to enable us to carry out appropriate checks in relation to contracts with you or someone else that you work for or are otherwise related to).
- Information about events to which you or your colleagues are invited, and your personal information and preferences to the extent that this information is relevant to organising and managing those events (for example, your dietary requirements).
- Information relating to you that you give us or we otherwise obtain when you visit us (for example, if you sign in or are recorded on CCTV while visiting us, or you give us the registration details of your vehicle).

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### **Information that we obtain from you when you use our website may include:**

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number or social media handle used to connect with our customer service team.

### **Cookies and other technologies**

Our website uses cookies and other similar technologies such as web beacons to collect and store certain information. These typically involve pieces of information or code that a website transfers to or accesses from your computer hard drive or mobile device to store and sometimes track information about you. Cookies and similar technologies enable you to be remembered when using that computer or device to interact with websites and online services and can be used to manage a range of features and content as well as storing searches and presenting personalised content.

Our website uses cookies and similar technologies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

We use cookies and other similar technologies to:

- Collect user information to enhance your experience using the service.
- Remember that you have visited us before; this means we can identify the number of unique visitors we receive. This allows us to make sure we have enough capacity for the number of users that we get.
- Collect anonymous statistical information about how you use our website (including
- How long you spend on our website) and where you have come to website from, so that we can improve the website and learn which parts of the site are most popular with users.

Some of the cookies used by the Site are set by us, and some are set by third parties who are delivering services on our behalf.

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### **The Cookies We Set**

Below you'll find the cookies and other technologies that we set when you visit our website and their purpose. To help you better understand why we're setting them, we've used the categories and definitions set by the International Chamber of Commerce ("ICC"):

- **Strictly Necessary:** cookies that enable the services that you have specifically asked or paid for;
- **Performance:** cookies that collect information on how visitors use Our Site including the pages visited and most frequented as well as the sources of our traffic. They are used to help us improve how the site works;
- **Functionality:** cookies that help us remember the choices you have made so we can provide you with a more personalised experience;

### **Cookie Name**

wpjb\_transient\_id

### **Purpose**

This cookie lets us remember certain settings when using the job application system.

### **Category**

Functionality

### **The Cookies Set by our Partners and Other Data Processors**

We have several partners who also set cookies and other technologies on our website. These partners include companies that help us better understand how to serve you, companies that serve our house ads, power the tools on our website, and companies that require cookies for their social applications to work.

They include:

### **Partner**

Google UAC

### **Purpose**

We use Google reporting tools and these cookies are used to measure site traffic and usage patterns.

### **Category**

Performance

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### **Cookie Removal and More Information**

You can always modify your browser so as not to accept cookies or to notify you when cookies are sent to it. For more information about cookies including removing any or all of your cookies, please visit <http://www.allaboutcookies.org>. Please note, however, that by blocking or deleting cookies used on our website, you may not be able to take full advantage of the website.

The law on data protection sets out a number of different reasons for which we may collect and process your personal data in certain circumstances, including:

### **Consent**

We can collect and process your data with your consent.

- For example, if you have given your consent to receiving to receiving marketing material from us at the point we collected your information.

### **Contractual obligations**

We need your personal data to comply with our contractual obligations.

- For example, where you have provided us with your email address so that you or your employer can receive our services, we will use this information in order to effectively deliver and communicate our services.

### **Legal compliance**

If the law requires us to, we may need to collect and process your data.

- For example, we can pass on details of people involved in fraud or other criminal activity affecting us to applicable law enforcement.

### **Legitimate interest**

We may require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

- For example, it is in our legitimate interests to ensure that content from our website is presented in the most effective manner for you and your computer and we provide you with the information, products and services that you request from us.

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### **Our promotional updates and communications**

Where permitted in our legitimate interest or with your prior consent where required by law, we will use your personal information for marketing analysis and to provide you with promotional update communications by email about our products/services.

You can object to further marketing at any time by selecting the “**unsubscribe**” link at the end of all our marketing and promotional update communications to you, or by sending us an email to **mclaren.news@mclarengroup.com**.

You can also request that we send marketing material to a non-personal email address instead of one which identifies you as an individual.

### **Who we give your information to**

We may share your personal data with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, who support our processing of personal data under this policy. [If any of these parties are using your information for direct marketing purposes, we will only transfer the information to them for that purpose with your prior consent].
- Appropriate third parties including:
  - our business partners, customers, suppliers and sub-contractors for the performance of any contract we enter into or other dealings we have in the normal course of business with you or the person that you work for;
  - our auditors, legal advisors and other professional advisors or service providers; and
  - credit reference agencies for the purpose of assessing your credit score where this is in the context of us entering into a contract with you or the person that you work for.
- In relation to information obtained via our website:
  - analytics and search engine providers that assist us in the improvement and optimisation of our site and subject to the cookie section of this policy.

### **Other disclosures we may make**

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets subject to the terms of this privacy policy.
- If McLaren Group or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

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- If 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 supply terms and other agreements with you or the company you work for; or to protect the rights, property, or safety of [insert company name], our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

### Where do we store your information?

The data that we process in relation to you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”) that may not be subject to equivalent data protection law. It may also be processed by staff situated outside the EEA who work for us or for one of our suppliers.

We may transfer your personal information outside the EEA:

- In order to store it.
- In order to enable us to provide goods or services to and fulfil our contract with you or the company you work for. This includes order fulfilment, processing of payment details, and the provision of support services.
- Where we are legally required to do so.
- In order to facilitate the operation of our group of businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

Where your information is transferred outside the EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on a recognised legal adequacy mechanism which may include contracts or the EU-U.S. Privacy Shield Framework, and that it is treated securely and in accordance with this privacy policy.

### How we protect your information

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data

transmitted to our site/; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our website may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

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### **How long we keep your information**

We retain personal data for seven years, in line with applicable data protection law and guidance. We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

### **Your rights**

You have the right under certain circumstances:

- to be provided with a copy of your personal data held by us;
- to request the rectification or erasure of your personal data held by us;
- to request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);
- to object to the further processing of your personal data, including the right to object to marketing;
- to request that your provided personal data be moved to a third party.

### **Your right to withdraw consent:**

Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us at **mclaren.news@mclarengroup.com**. You can also change your marketing preferences at any time as described in 'Our promotional updates and communications' section.

### **How to exercise your rights**

You can also exercise the rights listed above at any time by contacting us at:

**craig.young@mclarengroup.com**.

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, (see [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.html](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html)). The **Information Commissioner** is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

### **Changes to this policy**

Any changes we make to our privacy policy in future will be posted on our website at **www.mclarengroup.com** and, in relation to substantive changes, will be notified to you by e-mail. This policy was last updated on 23 May 2018.

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**Contact us**

Our full details are:

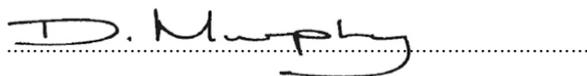
Craig Young

Leconfield House, 3rd Floor East, Curzon Street, London, W1J 5JA

**[craig.young@mclarengroup.com](mailto:craig.young@mclarengroup.com)**

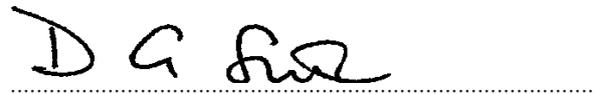
The Board of Directors of the Company delegate the approval of this statement on its behalf to the Managing Directors of the Company.

For and on behalf of McLaren Construction Ltd  
on 01 July 2018



**David Murphy**

Managing Director - Distribution and Mixed Use



**David Smith**

Managing Director - Construction