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## PRIVACY NOTICE

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**Prepared By:**

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**74A London Road, Stockton Heath, Warrington, WA4 6HR**

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**Version (6.0)**

**Signed:**



## Document Control Record

| Origin Date | Revision Number | Document Title | Reason for Amendment                                                                                                                          | Amendment by Amendment Date | Approved By |
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| 12/12/2021  | 1.0             | Privacy Notice | Annual review                                                                                                                                 | 13/12/2022                  | JFO         |
| 13/12/2022  | 2.0             | Privacy Notice | General Update:<br>✓ Title page added.<br>✓ Document control page added.<br>✓ Table of contents added.<br>✓ Document version added to footer. | Stuart Leak<br>01/02/2023   | JFO         |
| 01/02/2023  | 3.0             | Privacy Notice | General Update:<br>✓ Annual review                                                                                                            | Stuart Leak<br>01/02/2024   | JFO         |
| 01/02/2024  | 4.0             | Privacy Notice | General Update:<br>✓ Annual review                                                                                                            | Stuart Leak<br>31/01/2025   | JFO         |
| 31/01/2025  | 5.0             | Privacy Notice | Annual review<br>✓ Managing Director Derek Bradshaw added<br>✓ Company address changed                                                        | Stuart Leak<br>31/01/2026   | DB          |
| 31/01/2026  | 6.0             | Privacy Notice |                                                                                                                                               |                             |             |

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## PART 1 | PRIVACY NOTICE

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Please read this Privacy Notice to understand how we use and protect the data that you provide to us.

UK Data Protection Laws and EU General Data Protection Regulations (GDPR) require us to manage all personal data in a fair, lawful and transparent manner. This means that you are entitled to know how we intend to use any personal data you provide. You can then decide whether you want to give it to us in order that we may provide a service that you require. All our employees are responsible for maintaining customer confidentiality. We provide training and education to all employees and consultants to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

### 1.0 WHAT IS COVERED IN THIS DATA PRIVACY NOTICE?

- Why and how we use your personal data.
- How long we will keep your personal data.
- Passing personal data to others.
- Transferring your personal data outside of the UK.
- How we will protect your personal data.
- Your rights under General Data Protection Regulations (2018).

## 1.1 WHY AND HOW WE USE YOUR PERSONAL DATA

| Whose data will we receive?                                                                      | What type of data will we receive?                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Who will send us the data?                                                 | How will we use it?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Current Project Team Contacts; Clients, Contractors, Architects, Project Managers and Suppliers. | <p><b>General Correspondence:</b><br/>Letters, emails, faxes, etc.</p> <p><b>Tender Correspondence:</b><br/>Supplier<br/>Questionnaires, Project Briefs, ITT Forms, Drawings and other Supporting Documentation.</p> <p><b>Project Related Correspondence:</b><br/>Letters, Emails, Faxes, Surveys, Reports, Drawings, Orders, Invoices and other Project-Related Documentation.</p> <p><b>Contact details such as:</b><br/>Names, Phone Numbers, Job Titles, Email Addresses and Addresses.</p> | Individuals or Representatives from a Client Organisation or Project Team. | <ul style="list-style-type: none"> <li>In the line of everyday business activities including responding to SQs/ITTs and liaising with individual persons as part of a procurement or project team regarding project specific information and in relation to the services for which we have been appointed.</li> <li>To keep contacts updated about legitimate related news such as the latest advice and information regarding Regulatory reforms, changes to forms of contract, best practice, changes in HSE guidance, KOK services such as free CPD events and general construction news via our <i>Technical Newsletter</i>.</li> </ul> |
| Past Project Team Contacts; Clients, Contractors, Architects, Project Managers, etc.             | <p><b>General Correspondence:</b><br/>Letters, emails, faxes, etc.</p> <p><b>Tender Correspondence:</b><br/>Supplier<br/>Questionnaires, Project Briefs, ITT Forms, Drawings and other Supporting Documentation.</p> <p><b>Project Related Correspondence:</b><br/>Letters, Emails, Faxes, Surveys, Reports, Drawings and other Project-Related Documentation.</p>                                                                                                                               | Individuals or Representatives from a Client Organisation or Project Team. | <ul style="list-style-type: none"> <li>We will store this data securely in our archive for a period of up to 14 years in accordance with Client / contractual requests / requirements regarding retention of project-specific documentation. Health &amp; Safety File correspondence and other health and safety information may be kept indefinitely.</li> </ul>                                                                                                                                                                                                                                                                           |

| Whose data will we receive?                                                          | What type of data will we receive?                                                                                                                                        | Who will send us the data?                                                 | How will we use it?                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Past Project Team Contacts; Clients, Contractors, Architects, Project Managers, etc. | <b>Contact details such as:</b><br>Names, Phone Numbers, Job Titles, Email Addresses and Addresses.                                                                       | Individuals or Representatives from a Client Organisation or Project Team. | <ul style="list-style-type: none"> <li>To keep contacts updated about legitimate related news such as the latest advice and information regarding regulatory reforms, changes to forms of contract, best practice, changes in HSE guidance, KOK services such as free CPD events and general construction news via our <i>Technical Newsletter</i></li> </ul>                                                                                          |
| Marketing Contacts / Networking Partners for joint business development.             | <b>General Correspondence:</b><br>Letters, emails, faxes, etc.<br><br><b>Contact details such as:</b><br>Names, Phone Numbers, Job Titles, Email Addresses and Addresses. | Individuals only through general business discussions and enquiries to KOK | <ul style="list-style-type: none"> <li>To advise of business development opportunities of potentially joint interest.</li> <li>To keep contacts updated about legitimate related news such as the latest advice and information regarding regulatory reforms, changes to forms of contract, best practice, changes in HSE guidance, KOK services such as free CPD events and general construction news via our <i>Technical Newsletter</i>.</li> </ul> |

With regard to using your contact details/data for our *KOK Technical Newsletter*, careful consideration is put into its content to ensure it will be both relevant and useful to you as a construction professional.

However, you have the right to opt-out of this at any point by emailing us at [enquiries@kok-surveyors.com](mailto:enquiries@kok-surveyors.com) advising us as such and we will then ensure you are removed from the *KOK Technical Newsletter* mailing list, though this does not mean that your personal data is deleted entirely due to the reasons listed in the table above - there may still be a legal requirement to process them as part of a project team.

## **2.0 HOW LONG WE WILL KEEP YOUR PERSONAL DATA**

Further to the above, when determining how long we keep data for, we take into account our legal obligations, the expectations of both our clients or employers and data protection regulators and the amount of time we may strictly need to hold your personal data to carry on our business or defend our rights.

As stated above this could be up to 14 years or indefinitely if it pertains to the Health & Safety Files we collate and produce. For example, if you are on a project team alongside KOK, we have or keep your data whilst the job is ongoing. To meet legal, contractual, regulatory and business requirements, we must keep much of this data for a number of years after the job has been completed - even if we have not worked together since then.

Keelagher Okey Associates Ltd will regularly review the personal data we hold and assess if it is still necessary to have in our records. In certain circumstances, data retention will depend on details of a contract, such as archiving and storing Health & Safety Files (which will contain project team member's personal data such as contact details) for a specified length of time in the event that these are requested or in case of a dispute.

## **3.0 PASSING PERSONAL DATA TO OTHERS**

Keelagher Okey Associates Ltd will never share or send your data/contact details to any parties for reasons other than the progression of the bid or project.

## **4.0 TRANSFERRING YOUR PERSONAL DATA OUTSIDE OF THE UK**

Keelagher Okey Associates Ltd will never send your data/contact details to any party outside of the UK for reasons other than the progression of the bid or project.

## **5.0 HOW WE WILL PROTECT YOUR PERSONAL DATA**

Keelagher Okey Associates Ltd have in place appropriate and up to date technical and cyber security programs that keep our documentation and your personal data safe from breach or threat. Electronic documentation and data is periodically backed up onto remote servers and 3rd party storage which are also extremely secure and well protected. We also ensure our staff and consultants are trained and are regularly brief on best practise of the protection of data that we hold.

## 6.0 YOUR RIGHTS UNDER GENERAL DATA PROTECTION REGULATIONS (2018)

You have certain rights over your personal data. These include the right to access a copy of your personal data or have some elements of it transmitted to you or another company in a common electric format. In certain circumstances, you can have your personal data corrected or erased, or you can restrict our use of it. You also have the right to object to the way we use your personal data as described above.

You have the following rights:

- a) **Access** - You have the right to ask KOK if we have your personal data. If we do, you have a right to know why we have it, what type of data we possess, whether we have or will send it to others, how long we will keep it and where we got it from.
- b) **Rectification** - Where any of your personal data is incorrect, you have a right to tell us to correct it promptly. Please tell us as quickly as possible if you change your address or other contact details. If your data is incomplete, you can ask us to correct this too.

In certain circumstances, you'll have the following extra rights:

- c) **Right to object** - Depending on the legal basis for which we are using your data, you may be entitled to object. For example, where we're using your personal data connected with marketing, we will stop if you object (as mentioned at the end of Section 1 of this Privacy Notice). However, if we're using your data to meet certain legal obligations, we may continue to do so even if you object.
- d) **Erasure** - You may have a right to have some or all of the data we hold about you deleted. However, you should be aware that, as a Construction Consultancy Firm specialising in Health & Safety, we may be required to retain many records in relation to construction projects that you may have been involved in.
- e) **Portability** - In certain circumstances you would be entitled to receive some of your data from us electronically. We can either pass the information to you, or to another person or business if you instruct us in writing.
- f) **Restriction** - You might also be entitled to ask us to restrict our use of your data - for example if you think the information we hold on you is incorrect.
- g) **Consent** - If you consent to us using your data, you have the right to withdraw that consent at any time.



**Name:** Derek Bradshaw  
**Position:** Managing Director  
**Date:** 31<sup>st</sup> January 2026