

# **Watkin Jones Group**

## **Privacy Notice**

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# **Watkin Jones Group**

## **Privacy Notice**

### **Introduction**

Watkin Jones Group (“WJG/we/us/our”) is committed to safeguarding and preserving the privacy of our visitors and customers and to protecting the personal data that we process in line with the data protection principles set out in the UK Data Protection Act of 2018, the UK General Data Protection Regulation and the EU General Data Protection Regulation 2016/679) (collectively, “Data Protection Regulations”);

This privacy policy sets out the bases on which any personal information we collect from you, or that you provide to us, will be processed by us. It is important that you read this policy in full to understand what information we hold about you, how we may use it and what rights you have in relation to your data.

By giving us your personal information, directly or through third parties, and using any products or services that we provide, you are accepting and consenting to our processing of your personal information in accordance with the practices described in this policy.

Watkin Jones owns and operates Fresh Property Group limited. For information about this company, their services, and about their privacy notice, please refer to their web site (<https://thisisfresh.com/>) for further information.

- If you are a sub-contractor or visitor to one of our construction sites, please refer to our separate privacy notice for site personnel.
- If you are a home buyer, please refer to our separate privacy notice for Watkin Jones Homes (<https://www.watkinjoneshomes.co.uk/privacy-policy>).
- If you are applying for an employment opportunity with us please refer to our separate privacy notice for job applicants (<https://careers.watkinjonesplc.com/privacy>).

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to the products and services we offer. When changes are made, we will update the date at the top of this document. Please review this privacy notice periodically to check for updates.

### **Who are we?**

We are Watkin Jones Group plc, a public limited company incorporated in England and Wales with company number 09791105. Our registered address is 3 Llys Y Bont, Parc Menai, Bangor, United Kingdom, LL57 4BN

Watkin Jones is a “data controller”. This means that we are responsible for deciding how we hold and use personal information we have collected from you. We are registered with the Information Commissioner’s Office (registration number Z1850350).

If you have any questions, or want more details about how we use your personal information, you can contact our Data Protection Manager by post or email at this address:

Watkin Jones Group plc  
3 Llys Y Bont,  
Parc Menai,  
Bangor,  
LL57 4BN  
[compliance@watkinjones.com](mailto:compliance@watkinjones.com)

## Information provided by you

We may collect and process information about you when you contact us, such as;

- When you use our website to request brochures/reports or for us to contact you by telephone, post and/or email about our products, developments and offers.
- When you talk to us on the phone or face to face when you visit one of our developments and request brochures/reports or for us to contact you by telephone, post and/or email about our products, developments and services.
- When you fill in one of our forms.
- When you contact us by email or other electronic means or by letter.

We use cookies on our website. Cookies are small text files that are downloaded to your device when you visit a website, unless you have set your browser to reject them. We use cookies to remember your preferences, display content that is more relevant to you and improve your overall experience of our site.

To learn more about cookies and what you can do to opt out of receiving them, please view our cookies notice (<https://watkinjonesplc.com/site-tools/cookies-policy/>). Our website contains links to other websites. This privacy notice only applies to this website, so please read the privacy notices provided by the other websites before posting any personal information.

## Information we may collect from others

We may collect information about you from third parties that refer your personal information to us so that we can send you information about our products, developments and services, or so that we can contact you by telephone, post and/or email. These third parties include;

- Online property portals such as Zoopla and Rightmove.
- Estate agents.
- Mortgage brokers.
- Government purchase assistance scheme providers, such as Homes England or Help to Buy - Wales
- Other property companies including registered providers of social housing.

## What personal information we may hold about you

We may collect the following personal information from you:

- Your name (first and last)
- Your job title
- Your work address
- Your work contact telephone number(s)
- Your work email address(es)

- Any personal information that you disclose to us in letters, requests for information, emails and/or telephone conversations between us.
- If you are a sub-contractor who works for us, your bank account and national insurance details.

## **If you choose not to give personal information**

If you choose not to give us your personal information, it may mean that we cannot provide our products or services to you or employ you to work for us.

We will only collect the personal information that we need to be able to provide a service to you or to enable you to work for us.

When we ask you for information, we will make it clear why we need it. Any data collection that is optional will be made clear at the point of collection.

## **Our purpose for collecting and processing your personal data**

Data Protection law says that we can use your personal information only if we have a lawful purpose for doing so. This means that we can only process your personal data if we have one (or more) of these reasons:

- To fulfil a contract we have with you, or
- To comply with a legal obligation, or
- When it is in our legitimate interest, or
- When you consent to it, or
- To protect your vital interests e.g. in cases of life or death, or
- When it is in the public interest e.g. it's necessary to deliver justice.

A legitimate interest is when we have a business or commercial reason to use your information. However, our use of your personal data must not have a negative or unfair impact on you.

Here is a list of all the ways that we may use your personal information, and which of the lawful reasons we rely on to do so.

| <b>Purpose</b>  | <b>Lawful basis</b>  |
|---|--|
| To respond to your enquiries.   | Our legitimate interests to respond to enquiries made via our website, by email, through our social channels or any other means.   |
| To provide you with information about our products, consultancy services, new developments or investment opportunities, or changes to our products and services including information about new developments. | Our legitimate interests to provide you with information about our products, services or investments that we think may be of interest to you.<br><br>When you agree to be contacted for marketing, we will rely on your consent, which may be withdrawn at any time. |
| To provide you with information about government purchase assistance schemes,   | Our legitimate interests to provide you with information about products and services that we think you may want or need, or that we  |

|  |  |
|--|--|
| such as Help to Buy, and government policies that relate to home ownership.  | think may be of interest to you. There may also be a legal obligation for us to process the information.   |
| To carry out marketing analysis and research about our products and services and your marketing requirements.  | <p>Our legitimate interests to ensure we are providing you with information about products and services that we think you may want or need, or that we think may be of interest to you.</p> <p>When you agree to be contacted for marketing, we will rely on your consent, which may be withdrawn at any time.</p>   |
| To monitor telephone calls between us for authentication, security, quality, and training purposes.  | Our legitimate interests to help monitor our performance and to improve our products and services.   |
| Capture CCTV footage for security, quality and training purposes.  | Our legitimate interests to protect the health and safety of visitors, staff and contractors and to prevent crime at our premises.   |
| To process a complaint received from you.  | <p>Our legitimate interests to manage our relationship with you.</p> <p>We may also need to fulfil our legal and contractual duties.</p>   |
| To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit. | <p>Our legitimate interests to identify areas for managing current relationships, develop new products and services and manage the business.</p> <p>Our legal obligations to comply with laws and regulations that apply to us.</p>  |
| To engage you to work for us as a sub-contractor.  | <p>To enable us to fulfil our contract with you.</p> <p>Our legitimate interests are to communicate with you in the delivery of services on site and provide effective project management.</p> <p>To fulfil our legal obligations for health and safety or to comply with other laws and regulations that apply to us and for our insurance claims purposes.</p> |

## Marketing

It's a legitimate business interest for us to send you postal communications (from time to time) which may comprise information we think you may want or need, or that may be of interest to you. You can ask us to stop sending you marketing materials by contacting us at any time using the contact details below.

Before sending electronic marketing communications, we will follow the law and guidance which requires us to seek your consent. You can withdraw your consent at any time. Please contact us using the contact details below or email our Data Protection Manager at [compliance@watkinjones.com](mailto:compliance@watkinjones.com) or follow the 'unsubscribe' instructions on our marketing communications.

We may ask you to confirm or update your choices from time to time and if there are changes in the law, regulation, or the structure of our business.

We will never sell your personal data to third party organisations for marketing purposes.

## **Who we share your personal information with?**

Sometimes we need to share personal information we hold about you with other organisations that we work with or who provide services on our behalf. When sharing information, we will comply with all aspects of data protection law.

Where sharing is in our legitimate business interests, we may share your information without seeking your consent first. This may be with third parties providing services on our behalf. For example, one of our conveyancing solicitors or one of our panel of recommended independent financial advisers.

We may also share information when required by law for example where ordered by the Court or to protect an individual from immediate harm.

We may also share your personal information if the structure or ownership of Watkin Jones changes in the future. We may choose to sell, transfer, or merge parts of our company, or our assets; or we may seek to acquire other companies or merge with them. During any such restructuring we may share your information with other parties. We'll only do this if those parties agree to keep your data safe and private.

## **International transfers**

We will only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions, or
- Comply with a legal duty.

If we transfer information outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA.
- Put in place a contract with the recipient that means they must protect it to the same standards as the UK/EEA.

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

We will keep your personal information for as long as:

- You remain an active prospect on our marketing database and/or we have products and services we believe are relevant or of interest to you.
- You remain an active investor in our developments or a shareholder in our company.

- You are engaged to work with us as a sub-contractor or visit one of our construction sites.

After you stop being an active prospect, we may keep your information for up to 12 months for one of these reasons:

- To respond to any questions or complaints or to resolve any follow up issues between us.
- To show that we treated you fairly.
- To maintain records according to legal rules that apply to us.

We have a data retention schedule which sets out the periods we keep other types of information, such as construction contractual documents, H&S incident or accident reports or other regulatory purposes. This is based on legal requirements and best practice.

We will apply appropriate technical and organisational measures to ensure your personal information is kept secure.

## **Your rights regarding your personal information**

Watkin Jones is committed to upholding your data privacy rights, which are listed below. If you wish to write to us regarding any of your rights, please contact our Data Protection Manager at [compliance@watkinjones.com](mailto:compliance@watkinjones.com) to request a copy of our Data Subject Access Request Form (DSAR).

In certain situations, you are entitled:

- to be informed about the processing of your personal data (this is what this privacy notice sets out to do)
- to object to processing of your personal data
- to withdraw your consent to processing your personal data
- to have your personal data erased
- to restrict processing of your personal data
- to request access to your personal data and information about how we process it
- to have your personal data corrected if it is inaccurate and to have incomplete personal data completed

If you wish to exercise any of these rights, please contact us using the details set out in the “Contact Us” section below. You will not have to pay a fee to exercise any of these rights, unless your request is clearly unfounded, repetitive, or excessive (in which case we can charge a reasonable fee). Alternatively, we may refuse to comply with your request in these circumstances.

We have one month to provide you with the information you’ve requested (although we will try to provide this to you as promptly as possible). We may extend this period by a further two months if your request is complex or we have received several requests from you. If this is the case, we will inform you within one month of the receipt of your written request, explaining why an extension is necessary.

We encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

## **How to complain**

If you are unhappy with why or how we have used your personal information, please contact us using the contact details below.

You have the right to lodge a complaint with the supervisory authority where your data has or is being used in a way that you believe does not comply with the Data Protection Regulations. The UK supervisory authority is the Information Commissioner's Office and can be contacted at the following address:

Information Commissioner's Office,  
Wycliffe House, Water Lane,  
Wilmslow,  
Cheshire SK9 5AF  
Phone: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)

## **Contact Us**

If you have any queries or concerns about the way in which we use your information, you can contact us at [compliance@watkinjones.com](mailto:compliance@watkinjones.com) or by writing to The Data Protection Manager, Watkin Jones Group, 3 Llys Y Bont, Parc Menai, Bangor, LL57 4BN.

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