

STEWART WATSON & CO. LTD
PRIVACY NOTICE

ABOUT THIS NOTICE

Stewart Watson & Co. Ltd is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you in accordance with data protection law. Please read it carefully.

Data protection law says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely

1 INFORMATION ABOUT US

1.1 We are Stewart Watson & Co. Ltd. Our registered office is at 130 Fleet Street, London, EC4A 2BH and our registered company number is 04301547.

1.2 If you have any questions, our contact details are:

1.2.1 Email address: gt@swco.co.uk

1.2.2 Telephone number: 020 7426 0960

1.2.3 Postal Address: 130 Fleet Street, London EC4A 2BH

2 CONTRACT INFORMATION AND OTHER CORRESPONDENCE

2.1 **If you are an individual**, when you enter into a contract with us (or someone does so on your behalf) there will be personal information about you relating to that contract such as your name, contact details, contract details, delivery details, payment details, and correspondence with us about the contract.

2.2 If you are an individual, we need certain information to carry out our contract with you and you must provide this in order to enter into a contract with us (or as required under that contract), if you do not, we may not be able to carry out our contract with you. Mandatory information fields are generally set out when you are entering into the contract, but in particular, you must provide the following information:

2.2.1 Your name and contact details.

2.2.2 Your delivery address.

2.2.3 Your payment details.

- 2.3 Anti-money laundering and “know your client” information.
- 2.4 **If you work for one of our corporate clients, suppliers or business partners**, the information we collect about you may include your contact information, details of your role and employment and our relationship and correspondence with you. This information may be collected directly from you, or provided by your organisation.
- 2.5 **Other correspondence or interaction** (for example by email, telephone, post, SMS or via our website) between you and us, will include personal information (such as names and contact details) in that correspondence. This may include enquiries, reviews, follow-up comments or complaints lodged by or against you and disputes with you or your organisation.
- 2.6 **Call information.** We may also collect details of phone numbers used to call our organisation and the date, time and duration of any calls. Please note that if we record your calls to or from us, we will inform you of this.
- 2.7 **Why we use this information.** We will keep and use that information to carry out our contract and manage our relationship with you or your organisation (as applicable), to comply with any legal requirements for us to maintain certain records or carry out certain verifications and money laundering checks, and/or for our legitimate interests in preventing fraud, dealing with a complaint or enquiry and administering your (or your organisation's) account or order and any services we offer, as well as to review and improve our offerings, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- 2.8 **Where your information relates to a contract**, it is kept for a period of up to seven years (or, in certain circumstances where our liability period is longer, twelve years) after the end of our relationship with the relevant client to enable us to deal with any after sales enquiries or claims and as required for tax purposes.
- 2.9 Any other information set out above such as initial enquiries or correspondence which doesn't relate to a customer is kept for twelve months after the last correspondence.

3 WEBSITE INFORMATION

- 3.1 **We may collect information about you and your use of our website** via technical means such as cookies, webpage counters and other analytics tools. This may include your IP address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access a website as well as the date and time of your access, what you interact with on our website, and the website from which access is made. We use this as necessary for our legitimate interests in administering and improving our website and its content, to ensure it operates effectively and securely, to develop our business and inform our marketing strategy, and for other administrative purposes. We may also create aggregate statistical data from that information (for instance, overall numbers of website visitors) which is not personal information about you.
- 3.2 For detailed information on the cookies on our site and the purposes which they are used for see our Cookie Notice which can be found at www.swco.co.uk.
- 3.3 **Third party websites.** Our website may, from time to time, contain links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

4 **SITE PHOTOS**

- 4.1 As part of our professional services, we may take photos at relevant sites which you may be incidentally captured in. To the extent that these photos include or constitute your personal data, we use them for our legitimate interests in providing our services to our clients. Photos would only be shared with our client (and in some circumstances their professional advisers and other relevant parties) as part of a professional report. You should be aware of our surveyors taking photos at the relevant site, and if you do not wish to be captured in any images please inform us or our client.
- 4.2 Photos are kept as part of our client file for up to seven years (or, in certain circumstances where our liability period is longer, twelve years) after the end of our relationship with the relevant client.

5 **OTHER PHOTOS, CONTENT AND PROMOTIONAL MATERIAL**

- 5.1 This is information about you which you provide to us (whether through our website or otherwise), or images or recordings of you which you allow us (or someone on our behalf) to take (including at our premises or events), for publication or display. This may include reviews, comments, testimonials, photographs (including stock photos and advertising material) and videos.
- 5.2 We may display and publish this content (and, if relevant, attribute it to you) on our platforms as necessary for our legitimate interests in providing content and for promotional purposes (or, in some circumstances, because you have specifically consented to us doing this). This information is kept and published or displayed by us for as long as we consider it relevant for those purposes. You can ask us to remove or delete your content at any time (subject to any agreements about our right to use it) by contacting us. If we are displaying or publishing the information based on your consent, you have the right to withdraw that consent at any time.

6 **APPLICATIONS, REFEREES AND EMERGENCY CONTACTS**

- 6.1 We will collect and hold information on job applicants (including applications for work experience or internships), including information you provide to us in your application, or provided to us by recruitment agencies, as well as information on you from any referees you provide. We may also collect information about your professional history which you make available on LinkedIn, or which are on your employer's website.
- 6.2 We use this as necessary to enter into an employment contract with you, and for our legitimate interests in evaluating candidates and recording our recruitment activities, and as necessary to exercise and perform our employment law obligations and rights. Where you voluntarily provide us with special categories of data, such as information about your race, health or sexuality, we will store this as part of your application on the basis that you have decided to make it public to us for this purpose, and to ensure that our record of your application is accurate so we can comply with (and demonstrate our compliance with) our obligations under employment law.
- 6.3 If you are successful in your application, your information will be used and kept in accordance with our internal privacy notice. If you currently work for us, or used to work for us, you can request a copy of this from us. If you are not successful in your application, your information will be held for up to six months after the relevant round of recruitment has finished.
- 6.4 You must provide certain information (such as your name, contact details, professional and educational history) for us to consider your application fully. If you have not provided all of

this information, we may contact you to ask for it. If you do not wish to provide this information, we may not be able to properly consider your application.

- 6.5 If you are listed as a referee by an applicant, we will hold your name, contact details, professional information about you (such as your employer and job title) and details of your relationship with the applicant. We will use this information as necessary for our legitimate interests in evaluating candidates and as necessary to exercise and perform our employment law obligations and rights. Your information will be kept alongside the applicant's information.
- 6.6 If you are listed as an emergency contact by someone who works for us, we will hold your name, contact details and details of your relationship with that member of staff. We will use this to contact you as necessary to carry out our obligations under employment law, to protect the vital interests of that member of staff, and for our legitimate interests in administering our relationship with that worker. Your information will be kept until it is updated by that member of staff, or we no longer need to contact them after they have stopped working for us.

7 **LEGAL CLAIMS**

Where we consider there to be a risk that we may need to defend or bring legal claims, we may retain your personal information as necessary for our legitimate interests in ensuring that we can properly bring or defend legal claims. We may also need to share this information with our insurers or legal advisers. How long we keep this information for will depend on the nature of the claim and how long we consider there to be a risk that we will need to defend or bring a claim.

8 **WHY ELSE DO WE USE YOUR INFORMATION?**

8.1 **Common uses of your information.** We will only use your personal information when the law allows us to do so. Although in limited circumstances we may use your information because you have specifically consented to it, we generally use your information in the ways set out in this notice because:

8.1.1 we need to perform a contract we have entered into with you.

8.1.2 we need to comply with a legal obligation.

8.1.3 it is necessary for our legitimate interests (or those of a third party) and your interests and rights do not override those interests.

8.1.4 we need to protect your interests (or someone else's interests) or where it is needed in the public interest (although these circumstances are likely to be rare).

8.2 **Change of purpose.** We will only use your personal information for the purposes for which we collected it as set out in this notice, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

9 **INFORMATION WE RECEIVE FROM THIRD PARTIES**

9.1 We may also receive information about you from the following sources:

9.1.1 **Our service providers.** We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers

and credit reference agencies) who may provide us with information about you, to be used as set out in this privacy notice.

- 9.1.2 **Businesses we have bought.** If we have acquired another business, or substantially all of its assets, which originally held your information, we will hold and use the information you provided to them, or which they otherwise held about you, in accordance with this privacy notice. If we are reviewing whether to acquire a business, or substantially all of its assets, which holds your personal data (whether you are a customer or employee of that business or otherwise) we may receive limited personal data about you from that business or professional advisors involved in the transaction, as necessary for our legitimate interests in making decisions about that acquisition. If we do not acquire that business, any information we receive about you will be deleted as soon as practicable following the decision not to acquire.
- 9.1.3 **Publicly available sources.** If relevant as part of our relationship with you, we may obtain information from publicly available sources such as Companies House or LinkedIn.
- 9.1.4 **Credit information.** We may also collect credit information on you from third party reference agencies.

10 SHARING YOUR INFORMATION

- 10.1 **We never sell your data to third parties.** But we may need to share your information with third parties, including third-party service providers. Third parties are required to respect the security of your personal information and to treat it in accordance with the law.
- 10.2 **Why might we share your personal information with third parties?** We may share your personal information with third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our agreements with you, or to protect the rights, property, or safety of us, our customers, or others or where we have another legitimate interest in doing so. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- 10.3 **Which third-party service providers process your personal information?** We may need to share your personal information with third-party service providers (including contractors and designated agents) so that they can carry out their services. We may use third-party service providers in relation to the following types of activity: legal advice, contract administration, administration, IT services, and file storage.
- 10.4 **How secure is your information with third-party service providers?** All our third-party service providers are required to take appropriate security measures to protect your personal information. Where third parties process your personal information on our behalf as "data processors" they must do so only on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- 10.5 **What about other third parties?** We may share your personal information with other third parties, for example with potential buyers and professional advisers in the context of the possible sale or restructuring of the business where necessary in connection with the purposes which your information was collected for. We may also need to share your personal information with a regulator or to otherwise comply with the law.

11 WHERE WE STORE YOUR INFORMATION

- 11.1 Our office headquarters and data storage are based in the UK. However, where required to perform our contract with you or for our wider business purposes, the information that we hold about you may be transferred to, and stored at, a destination outside the UK and the EU.
- 11.2 We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy notice.
- 11.3 Some countries or organisations outside of the UK and the EU which we may transfer your information to will have an "adequacy decision" in place, meaning the EU considers them to have an adequate data protection regime in place. These are set out on the European Commission website: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.
- 11.4 If we transfer data to countries or organisations outside of the UK and the EU which the EU does not consider to have an adequate data protection regime in place, we will ensure that appropriate safeguards (for example, model clauses approved by the EU or a data protection authority) are put in place where required. To obtain more details of these safeguards, please contact us.

12 DATA SECURITY

- 12.1 As well as the measures set out above in relation to sharing of your information, we have put in place appropriate internal security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- 12.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where necessary.

13 HOW LONG WILL WE KEEP YOUR INFORMATION FOR?

- 13.1 We have set out above indications of how long we generally keep your information. In some circumstances, it may be necessary to keep your information for longer than that in order to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 13.2 To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 13.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

14 YOUR RIGHTS

- 14.1 Data protection law gives you a number of rights when it comes to personal information we hold about you. The key rights are set out below. More information about your rights can be

obtained from the Information Commissioner's Office (ICO). Under certain circumstances, by law you have the right to:

- 14.1.1 **Be informed** in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why we are providing you with the information in this notice. If you require any further information about how we use your personal information, please let us know.
- 14.1.2 **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- 14.1.3 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 14.1.4 **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it (for instance, we may need to continue using your personal data to comply with our legal obligations). You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- 14.1.5 **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to us using your information on this basis and we do not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim). You also have the right to object where we are processing your personal information for direct marketing purposes.
- 14.1.6 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- 14.1.7 **Request the transfer** of your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.
- 14.1.8 **Withdraw consent.** In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another compelling legitimate interest in doing so.
- 14.1.9 **Lodge a complaint.** If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority (if you are in the UK, this will be the ICO).

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, withdraw your consent to the processing of

your personal information or request that we transfer a copy of your personal information to another party, please contact us.

- 14.2 **No fee usually required.** You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- 14.3 **What we may need from you.** We may need to request specific information from you to help us understand the nature of your request, to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. If we request any identification from you for this purpose, it is on the basis that it is necessary to comply with our legal obligations, and we will only keep and use this until your identity has been verified.
- 14.4 **Timescale.** Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will let you know.

15 **CHANGES TO THIS PRIVACY NOTICE**

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail or otherwise. Please check back frequently to see any updates or changes to our privacy notice.