

## Privacy Policy

Welcome to TGA Building Consultancy's privacy policy.

As part of our obligations under the General Data Protection Regulations (GDPR), we've published this Privacy Policy to make it easier for you to find out how we use and protect your information.

We are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This includes what you tell us about yourself, what we learn by having you as a client or working with you as a service provider, and the preferences you make about what type of marketing you want us to send you. This Privacy Policy explains how we do this, tells you about your privacy rights and how the law protects you where we process your personal data.

This Policy will provide you with details such as:

- The types of information we collect about you and individuals connected to your business, and how we use it
- The legal grounds for how we use personal information
- Who the information may be shared with
- Increased rights which individuals have in relation to the information we hold about them
- How we keep your information secure and how long it is kept for

For the purpose of the Data Protection Act 1998 (Act) and General Data Protection Regulation (GDPR) (EU) 2016/679, the data controller is TGA Building Consultancy, a company registered in England and Wales under company number 2925312, with its registered office at Lake House, Market Hill, Royston, Herts SG8 9JN.

Keith Weston, Operations Director, is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact Keith Weston using the details set out below.

### Who does this Policy relate to:

This Privacy Notice relates to all our clients, who are a business (and individuals associated with them) or individuals, all 3<sup>rd</sup> party businesses and individuals who work with us to provide a service (suppliers, contractors, sub-contractors or referrer of business for example).

### Our Privacy Commitment

We commit to:

- keep your data safe and private
- not to sell your data
- give you ways to manage your marketing choices at any time

We will process all personal data in accordance with the following principles:

- all personal data must be processed lawfully, fairly and in a transparent manner

- all personal data must be collected for one or more specified, explicit and legitimate purposes and not processed in a manner incompatible with those purposes
- all personal data shall be restricted to what is adequate, relevant and limited for those purposes
- all personal data shall be kept accurate and up to date (and reasonable steps must be taken to erase or rectify inaccurate personal data)
- all personal data must be kept for no longer than is necessary for those purposes
- all personal data must be protected by appropriate technical and organisational security measures to prevent unauthorised or unlawful processing and accidental loss, destruction or damage.

#### Types of Personal data:

We will only collect details that are genuinely required e.g. in order to carry out our contractual and statutory obligations to you, or for the purposes of a balanced, genuine business interest for you and us.

Data may include but not be limited to:

- Name
- Business contact details including mobile/landline numbers, email address and business address
- Role title, position and responsibility details
- Additional information around the nature of your role, this may include qualifications and experience that you wish to tell us about
- Open data / public records which includes data that you have made freely available in a public domain such as via social media or publications and news articles
- Permissions - so we can record how you would like to receive information from us, or if you would prefer not to
- Extra information that you choose to tell us

Please note that the above list of categories of personal data we may collect is not exhaustive.

Personal data will be collected, stored and processed for the following purposes:

- In order to provide commercial building consultancy service to our Clients
- In order to comply with applicable legislation and statutory requirements
- In order to maintain adequate accounting and financial records and to invoice clients as and when appropriate
- To carry out research activities
- To provide you with marketing and other information about us and other goods and services we offer
- To obtain credit checks and or references if necessary and not prohibited by applicable legislation
- To carry out any other activities that may be ancillary or related to the above. (For marketing, advertising, or research purposes contact by email and text message),
- To make such Personal Data available (but only to the extent absolutely necessary) to third parties who provide products or services to us

## Lawful Processing Basis - Definitions

Under the GDPR, we must justify a lawful basis for processing your personal data. The most common basis are explained below.

- Legitimate interest - using people's data in ways they would reasonably expect in the context of our business, and which have a minimal privacy impact, or where there is a compelling justification for the processing.
- Contractual - where we need to fulfil our contractual or agreement obligations to you, or you have asked you to do something before entering into a contract (e.g. provide a quote).
- Consent - asking individuals to 'opt-in' as a preference to sign up to a newsletter for example.
- Legal / Statutory obligation - using your data because we are statutory required to do so, e.g. retaining invoices based on tax legislation.

## Reasons for processing your personal data

This list gives detail regarding the type of activity and what we process, why we process it and the lawful basis for us doing so.

| Processing Activity   | Reason for Processing  | Lawful Processing Basis           |
|---|--|-----------------------------------|
| Collecting personal data for new clients/3rd parties e.g. receiving a business card, exchanging details at events | To update you about our services and events  | Legitimate Interest               |
| Responding to requests for work, quotes and tenders   | Necessary in order to commence with a business prospect, processing would be expected by the client or 3rd party   | Legitimate Interest / Contractual |
| Carrying out work related requests and activities in line with an existing contract/agreement                     | To carry out duties in line with contractual/agreement related obligations.<br>To give relevant updates to clients/3 <sup>rd</sup> parties and conduct billing activities. | Contractual                       |
| Adding or amending contact details in our management system   | To keep records up to date, fulfil contractual obligations, carry out data cleansing activities  | Legitimate Interest               |
| Maintaining purchase history on client records  | To continue offering relevant services, ensuring records are kept up to date   | Legitimate Interest               |
| Conduct marketing activities to prospective clients   | To carry out marketing activities, inform clients of relevant services available, attend relevant events and give company and industry updates                             | Legitimate Interest / Consent     |
| Conduct marketing activities to existing contacts   | To carry out marketing activities, inform clients/3rd parties of relevant services available, attend relevant events and give company and industry updates                 | Legitimate Interest               |
| Record responses to questionnaires  | To maintain business relationships and monitor the quality and relevance of our services   | Contractual / Legitimate Interest |

|   |   |                     |
|---|---|---------------------|
| Address any requests from clients or 3rd parties  | To ensure clients/3rd parties receive the appropriate level of information requested.<br>To identify trends linked to repeated issues and improve our service and relationship with contacts  | Legitimate Interest |
| To address complaints from clients or 3rd parties | To comply with legal and regulatory requirements.<br>To resolve situations where the contact is dissatisfied and assess any measures of redress where justified.<br>To identify trends linked to repeated issues and improve our service and relationship to clients and 3rd parties. | Legal / Contractual |

### Marketing

We may use your data for marketing purposes as follows:

- Using your personal information by way of contact details in order to inform you and your business about new services, events and conduct campaigns
- To identify what type of marketing information we believe may be of use to you and what you may be interested in
- We will only use your information for marketing purposes when we justify our reasons to be a lawful basis using either ‘legitimate interest’ or ‘consent’
- We will only use your information for marketing purposes where you have not ‘opted out’ or otherwise indicated a preference not to hear from us
- We may periodically ask you to review your preferences about how we contact you and will make it easy for you to change your mind

### Opting Out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you OR by contacting us at any time.

### Social Media platforms

We operate social media platforms. It is our process and protocol that any personally identifiable data gathered on these platforms is only in response to users interacting out of their own volition with our marketing pages. The contact is deemed as a legitimate business enquiry. The personal contact data is removed from the site once the enquiry is processed or the user has requested so.

### Third Party Data

We work with various industries and may receive your contact details as a referral in some cases by other businesses. We will only process your data when there is legal justification for doing so e.g. where we reasonably believe it is in within our balanced business interests. If that occurs, we will provide you information about the source of the personal information.

## Parties we share data with

We may share your data with companies such as:

- Regulators and other authorities
- Any party linked with you or your business's product or service
- Companies we have a joint venture or agreement to co-operate with, where appropriate to do so, such as contractors, sub-consultants and consultants
- Organisations that introduce you to us
- Companies that we introduce you to, where appropriate to do so
- Companies you ask us to share your data with
- 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

We also have to share information or data in order to:

- Meet any applicable law, regulation or legal request
- Meet our contractual clauses for auditory purposes
- Detect, prevent, or otherwise address fraud, security or technical issues
- Protect against harm to the rights, property or safety of our users, the public or to our business and/or as required or permitted by law

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## Where we store your personal data

All information that you provide to us is stored on our, or our selected business partners', secure servers, and we will take reasonable steps to protect your information in accordance with this policy, including (without limitation):

- Installing a secure firewall
- Using anti-virus protection software
- Encrypting data where appropriate
- Carrying out regular back-ups
- Ensuring Access, at all levels, is role-based and only granted on a 'need to know' basis
- Ensuring data is periodically cleansed, archived or deleted in line with policy

In line with our security obligations we would also ask that you notify us of any changes to your data so we can keep our records as accurate as possible.

## Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from

unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

### Your rights

You have the following rights under law in respect of your personal information:

- The right to be informed about the collection and use of your personal information
- The right of access to your information to verify the legality of our use of it
- The right to request that inaccurate or incomplete information about you is rectified
- The right to request the deletion or removal of your information where there is no further reason for us to use it (such as you have withdrawn your consent)
- The right to restrict the use of your information
- The right to obtain and reuse the information that we have about you for your own purposes
- The right to object to certain uses (such as for marketing purposes)

Should you wish to exercise any of these rights, you may do so at any time by contacting us at the address given below.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### What we ask of you

**Keeping your information accurate and up to date.** If your information changes for any reason, for example if you change your name, address, then you should inform us of the change as soon as possible so that we can ensure your information is kept accurate and up to date.

**Business cards.** If you issue business cards to us your data will be processed by those who you share the business cards with. It is reasonably expected that the data will only be processed by those you share it with for business purposes, principally, to contact you in relation to your role and your business.

For any questions regarding this policy please contact.

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