

## 1. Introduction

Kuropatwa is committed to using any personal data that we hold responsibly, conscientiously and respectfully. This Privacy Policy aims to give you information on how the Kuropatwa collects and processes your personal data. This Privacy Policy outlines how, when and why we collect your personal information, how we store it to ensure it remains secure, and how you can remove your personal data from our system if you wished to. Kuropatwa is a private company limited by guarantee in England and Wales (Company number 06587544).

### Third Party Links on Kuropatwa's Website

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

We never share, sell or trade your personal information to any third parties.

## 2. The Personal Information We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified.

When you appoint Kuropatwa for your project, either by email, in writing, over the phone or in person, we may need to collect information from you in order to provide the service you are requesting (for example, the address of the project or the address for invoicing purposes). This information may include:

- Identity Data such as your name, title.
- Contact Data such as your billing address, project address, email address and telephone numbers.
- Financial information ie. personal bank details and mortgage lender information.
- Marketing and Communications Data such as your preferences in receiving marketing from us and your communication preferences.
- Professional data such as CSCS card number and other accreditations.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We will only collect data that falls into these Special Categories if you are applying for a job or are working with us; in such circumstances, the provision of such data is optional and consent will be obtained to store this data in accordance with applicable laws.

We do not knowingly collect any information from anyone under 16 years of age. Our website and services are directed to people who are at least 16 years old or older. If we learn we have collected or received personal information from a child under 16, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us directly.

If you fail to provide personal data where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### **3. Cookies**

Our website does not use Google Analytics, therefore pages have no cookies. However, where there is a Youtube video embedded onto a project page, this secondary site will collect cookies.

### **4. How We Collect Your Personal Information**

We collect your personal information when you contact us to request a quotation for your project. We also retain contact details for anyone we have met at a business meeting or networking event, when business cards or emails have been exchanged. Data, including financial and mortgage information from buyers, is obtained as part of the purchasing process of one of our properties. Employees' personal details are disclosed on induction.

### **5. How We Use Your Personal Information**

Kuropatwa will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To carry out our business and provide you with a service requested by you
- To provide you with a fee quotation, or information about Kuropatwa
- To carry out a credit check before work is undertaken
- To notify you with important updates regarding your project
- To raise invoices for services provided in accordance with our fee quotation
- Send a single follow up e-mail asking for feedback on the service provided

Where we believe there is legitimate interest:

- Target our communications to you so they are tailored and relevant
- Use the information on our database to appropriately target social media campaigns
- Invite you to participate in feedback surveys about our work and your experience of service provided by Kuropatwa.
- To determine if employees are medically fit to carry out a specific task.

### **6. How We Protect Your Personal Information**

Kuropatwa are committed to ensuring that your personal information is stored safely and securely. We have invested in appropriate technology and software to ensure that information cannot be accessed by unauthorised persons, and have in place a robust internal data processing policy to ensure that any staff, contractors or volunteers that come into contact with your personal data understand how and when it can be processed. Regular security reviews are held by us to ensure that the site remains safe and secure for your protection.

## 7. Data Retention Policy

We will only hold your information for as long as is necessary to conduct our business, unless you change your preferences or request your data to be removed at an earlier date. This retention period will vary depending upon the purpose for which your data was collected. For example, if you appointed us to provide development management or contracting services on your project, we will need to keep your information for insurance and tax purposes, we will typically keep your data for 12 years from the date of your last transaction. If you have worked with us, we will typically keep your data for 12 years from the date of your last day of paid work with us. For specific details on how long we will keep your personal data for, please contact us on the details outlined in the section below.

## 8. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights, please contact us directly.

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data’s accuracy;
- (b) where our use of the data is unlawful but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## **9. What We May Need From You**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **10. Time Limit To Respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **11. Changes To The Privacy Notices And Your Duty To Inform Us Of Changes**

Our Privacy Policy is regularly reviewed, we may need to make updates from time to time, to take into account either changes in legislation or changes at Kuropatwa. Any updates to our Privacy Policy will be posted on our website.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Signed



Mr. Alex Kuropatwa  
Director Responsible for Health and Safety  
April 2021