

This privacy notice describes how the Breedon Group (**we/us**) collects and uses information about its visitors to any of our sites or offices to the extent such information is personal data in accordance with the EU Regulation 2016/679 General Data Protection Regulation (**GDPR**). This document also satisfies our obligations under Article 30 of the GDPR. It applies to all site visitors of the Breedon Group (**You/Site Visitor**).

## **1. Important information and who we are**

### **Purpose of this privacy notice**

This privacy notice aims to give you information on how we collect and process your personal data, including any data you may provide to us when you visit any of our sites (including our offices) (each a **Site**).

The Company is a data controller for the purposes of the GDPR and every Site Visitor acknowledges the use and processing of personal data described in this privacy notice.

**Company** means the member of the Breedon Group where you are visiting. **Breedon Group** means any of companies within the Breedon group of companies, including, without limitation, Breedon Trading Limited, Breedon Cement Limited, Breedon Holdings Limited, Breedon Group Services Limited, Lagan Materials Limited, Lagan Asphalt Limited, Whitemountain Quarries Ltd, Alpha Resource Management Ltd, Breedon Cement Ireland Limited, Breedon Employees Services Limited and/or Breedon Brick Limited further details of which can be found at [www.breedongroup.com](http://www.breedongroup.com).

## **2. The data we collect about you**

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title and gender.
- **Contact Data** includes address, email address and telephone numbers including mobile telephone numbers and/or emergency contact details.
- **Audio Data** includes audio recordings of all telephone orders, enquiries and supplier communications.
- **CCTV Data** includes images (still or video) from the closed circuit television (**CCTV**) on the Company's sites or from onboard vehicle monitoring.

Due to the Coronavirus pandemic, in addition to the collection of personal data as mentioned above, we may also be required to collect the following information from you when attending at one of our sites in order to comply with the Government's legislation/guidelines in respect of any track and trace system operating in the jurisdiction of the Site (**Track & Trace**):

- information to determine whether a Site Visitor:

- has experienced or may be experiencing Covid-19 symptoms (which may include temperature checks); or
- is in any of the high-risk categories which are most vulnerable to become infected and seriously ill (**Health Information**); and/or
- if so has details of anyone a Site Visitor may have, in the preceding 14 days, been in contact with who has tested positive for Covid-19; or presented with symptoms; or has been asked to self-quarantine; or travelled to another country (**Contact History**).

### 3. How is your personal data collected?

We collect your personal data when you arrive as a “walk-in” in order for us to log any visitors as required by health & safety and/or Government guidelines/legislation.

The data we collect comes directly from you when attending a Site. Failing to provide the required personal data may mean we are unable to grant you access to our Site.

### 4. How we use your personal data

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

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we need to respond to your feedback.

### 5. Our lawful basis for processing

The Company collects and processes data about Site Visitors for purposes which include:

- As necessary for our own **legitimate interests** or those of other persons and organisation, for example:
  - for good governance, accounting and managing and auditing our business operations;
  - to protect the health and safety of workers and others;
  - maintaining, monitoring, improving and enhancing our goods and services;
  - to monitor Audio Data and CCTV Data for quality control and training or for the detection and prevention of crime or unauthorised use of our Site.
- As necessary to comply with our **legal obligations** for example:
  - where disclosure is necessary for or in connection with any legal proceedings (including prospective legal proceedings), for obtaining legal advice or for establishing, exercising or defending legal rights;
  - to comply with any regulatory obligations to which we are subject;
  - where we are required to do so by law (including under any legislation, or by a court or tribunal in any jurisdiction);
  - all Health Information and Contact History will be obtained in order that we can keep you and others safe and/or where we are required to comply with Government legislation/guidelines in respect of any track and trace system as part of a response to Covid-19.

## **6. Who we share Personal Data with**

We disclose personal data to a number of recipients which includes the following categories of persons:

- Other companies within the Breedon Group;
- Auditors and professional advisors, such as our bankers, lawyers and consultants;
- Law enforcement officials and statutory or regulatory authorities;
- Third-party service providers, such as providers of CCTV management; Audio Data management; IT system management; credit checks, debtor tracing; hauliers, contractors or subcontractors or associated services necessary to perform the contract.

## **7. Compliance with Data Protection Principles**

We will comply with data protection law which includes the GDPR (**Data Protection Laws**) applicable in the country in which the Company operates. This says that the personal information we hold must be:

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

### **Personal Data Retention Periods**

Except as otherwise permitted or required by applicable law or regulation, we only retain personal data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

### **Technical and Organisational Security Measures**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. In the unlikely event your personal data changes during your relationship with us please keep us informed.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to personal information.

- **Request correction** of the personal information that we hold.
- **Request erasure** of personal information.
- **Object to processing** of personal information where we are relying on a legitimate interest (or those of a third party) and there is something about the particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of personal information.
- **Request the transfer** of personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Breedon Group.

### **Changes to this Record of Processing Activities**

We reserve the right to amend this Privacy Notice from time to time consistent with the GDPR and other applicable data protection requirements.

### **Make a complaint**

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

### **Compliance Team**

We have appointed a Compliance Team who are responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice please contact the Compliance Team using the details set out below.

### **Contact details**

<b>Name</b>	<b>Office</b>	<b>Telephone and e-mail</b>
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