



Nelson Hughes Construction respect your privacy and are committed to protecting your personal information, which we call “personal data”. This privacy notice will tell you how we look after your personal data and about your privacy rights. It supplements any other notices and is not intended to override them. We have tried to be brief and clear and we are happy to provide any additional information or explanation.

WHO WE ARE

Nelson Hughes Construction (referred to as we, us or our) It is important that the personal data we hold about you is accurate and current. Please keep us informed of any changes.

THE INFORMATION WE COLLECT

The types of personal information we collect from you include:

Information you provide to us – personal information that you provide to us including your contact details (i.e. your name, email address, phone number and postal address) and your bank account details (course customers only).

Our correspondence – if you contact us, we may keep a record of that correspondence;

Sales and services information – details of transactions that you make with us and details of the services we provide to you.

HOW WE COLLECT YOUR PERSONAL DATA

You may give us data orally or by filling in forms or by corresponding with us by post, phone, email or otherwise, for example when you:

- enter into a contract with us or contact us about doing so;
- contact us about any contract we have with you;
- request marketing to be sent to you;
- enter a survey;
- provide some feedback to us.



HOW WE USE YOUR DATA

We will only use your personal data when the law allows us to, we have set out below how and why we plan to use your personal data.

- To provide our services effectively to you – examples: to administer our services, including handling your requests, communicating with you (including about any offers or promotions); keeping up-to-date records about you and carrying out our obligations arising from any contracts entered into between you and us, to make payments to you and receive payments from you (where applicable).
- To market to you – if you have not objected, to provide you with updates and offers about our products and services and the products or services of selected third party companies that we think may be of interest to you. We may use your information for marketing our own services to you by phone and post, where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing.

We will provide an option to unsubscribe or opt-out of further communication on any marketing communication sent to you or you may opt out by contacting us using the details on this website's 'Contact Us' page

LEGAL GROUNDS TO PROCESS

The legal grounds we rely on to process your personal information are that processing is necessary for:

- Our legitimate business interests or those of a third party and these interests are not overridden by your interests or fundamental rights and freedoms in relation to the protection of your personal information. Our legitimate business interests include enabling us to provide you with products, services and information about our products and services (marketing).
- Our performance of a contract made with you. This includes our providing you with products and services and our taking steps at your request towards, and in anticipation of, providing you with products and services;
- Our compliance with legal or regulatory obligations.



VISITORS TO OUR WEBSITE

If we want to collect personally identifiable information through our website, we will be up front about this. When someone visits our website, we may use a third-party service to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

Our website may include 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.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with third parties to help us run our business or carry out our obligations to you either under performance of a contract we have with you, or if it is necessary for our legitimate business interests, as set out in the 'How We Use Your Data' section above. These third parties may include:

- Service providers for IT and system administration.
- Our professional advisors including lawyers, bankers and auditors
- HM Revenue & Customs, regulators and other authorities.

We may also share your personal data with any third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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.



We work with carefully selected insurance intermediaries, who are regulated by the Financial Conduct Authority, to provide you with information about relevant insurance services. If we intend to pass your details to them we will inform you beforehand and give you an opportunity to object. If you tell us that you do not wish to have this information passed on we will respect your wishes. We confirm that all personal information held by us about you will remain in (and will not be transferred outside of) the United Kingdom.

DATA SECURITY

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.

HOW LONG WILL WE USE YOUR DATA FOR?

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, 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 requirements.

You can ask us about the retention periods for different aspects of your personal data by contacting our DPM. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



YOUR LEGAL RIGHTS

You have the right to:

- Make a complaint at any time to the Information Commissioner's Office (ICO) (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.). We would appreciate the chance to deal with your concerns first.
- 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 (see below), 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. We do not knowingly collect data relating to children.
- No fee usually required You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. 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.
- 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.



OUR COOKIES POLICY

The Nelson Hughes Construction website makes limited use of cookies. Cookies are small text files placed on your computer, tablet or phone when you visit a web site.

Types of cookie include:

Session cookies – remain on your computer, tablet or phone during a single browsing session, for example to remember items in a shopping basket. They do not remain on your computer, tablet or phone once you have closed your browsing session.

Persistent cookies – remain on your computer, tablet or smartphone between browsing sessions, for example to authenticate you, or remember your preferences between visits.

First-party & third-party cookies – first-party cookies are set by the web site being visited, third-party cookies are issued by a different web site to that being visited.

The cookies used on our web site comply with the EU Privacy Directive, adopted by the UK in its updated Privacy and Electronic Communications Regulations on 16 May 2016.

HOW WE USE COOKIES

Our web site uses the following two types of cookie:

Session ID cookie – this cookie allows the web server hosting our web site to respond to your actions on the web site for example, delivering pages as you browse. This cookie is automatically removed from your computer, tablet or phone when you close your browsing session.

Google Analytics cookies – these cookies are set by Google Analytics for anonymous web site visitor statistics. Information captured by Google Analytics includes date and time of visit, pages looked at, length of time on those pages, IP address, computer and browser type and how you arrived at our web site (e.g. through a search engine or via another web site). This information is not used to identify any individual; it is only collected to provide us with an understanding of how people find and use our web site, and to help us improve our web site and our services.

You can view the Google Analytics privacy policy here:
<https://support.google.com/analytics/answer/6004245?hl=en>

By using our web site you agree that we can place these types of cookies on your computer or device.

BLOCKING COOKIES

You can read more about cookies, including how to see what cookies have been set and how to manage, delete and block cookies by visiting <https://www.aboutcookies.org> or <https://www.allaboutcookies.org>.

We reserve the right to amend this Cookie Policy from time to time without prior notice.

You are advised to check this page regularly for any amendments.