

AT NOLAN PRIVACY NOTICE (EXTERNAL)

AT Nolan (Building Contractors) Limited ("AT Nolan, "we", "us") are committed to protecting the privacy and security of those with whom we interact. We recognise the need to respect and protect information that is collected or disclosed to us (called "Personal Information" as explained below).

This notice is intended to tell you how we collect and use your personal information during and after your relationship with us, in accordance with applicable Data Protection Laws.

1. WHO WE ARE

AT Nolan Limited ("AT Nolan", "we", "our", and "us") is a privately owned Mechanical & Electrical Engineering, Building Services and Facility Management Services company. As a leader in our chosen markets, our objective is to deliver excellent services for our customers, resulting in safe, fair and professional contracting services at all times.

AT Nolan is committed to handling data fairly, lawfully and in a transparent manner, and takes its data protection obligations seriously. AT Nolan ensures that it processes Personal Information in compliance with applicable data protection laws, including, without limitation, the General Data Protection Regulation 2016/679 ("GDPR"). AT Nolan is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection laws to notify you of the information contained in this Privacy Notice.

2. WHAT IS PERSONAL INFORMATION AND WHAT PERSONAL INFORMATION DOES AT NOLAN COLLECT ABOUT YOU?

For the purposes of this Privacy Notice "**Personal Information**" consists of any information that relates to you and/or information from which you can be identified, directly or indirectly. For example, information which identifies you may consist of your name, address, telephone number, photographs, location data, an online identifier (e.g. cookies identifiers and your IP address) or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity. When we combine other information (i.e. information that does not, on its own, identify you) with Personal Information, we treat the combined information as Personal Information.

We may collect use, store and transfer different kinds of Personal Information about you including your name, contact details, medical and healthcare information, bank details, time sheet information, employment history, driving licence and passport, gender, disciplinary and grievance information, performance information, recruitment information, criminal offence data, race, ethnicity, religious beliefs, location of employment or workplace, employer's details, compensation history, photographs and video images, and biometric data in the form of fingerprints (please see Appendix III of this Privacy Notice in respect of our use of biometric data).

3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We use different methods to collect data from and about you including:

I. Personal Information you provide directly.

You may give us your contact, identification details and financial data (such as your name, home address, telephone number and bank account information) by filling in forms or corresponding with us by phone, email, post or otherwise.

II. Automated technologies or interactions

In some cases, we may collect information about your computer, including your IP address, operating system and browser type. We collect this personal data by using cookies, server logs and other similar technologies.

III. Third parties or publicly available sources

We may also receive personal data about you from various third parties and public sources, such as Companies House, analytics providers such as Google and background check providers.

IV. Surveillance

We may capture photographs or video images of you by way of CCTV in operation throughout AT Nolan's controlled sites and offices.

4. HOW DO WE USE YOUR INFORMATION?

We may use the Personal Information we collect for:

- recruitment and entitlement to work in the UK (see section 13 for more information);
- providing services;
- analysis purposes;
- customer support;
- service improvement;
- general business purposes;
- carrying out our legal obligations;

- prevention of accidents on Wates' controlled sites;
- for training and quality purposes;
- internal record keeping in compliance with the GDPR; and
- marketing, sales and promotional plans including updating and maintaining our client relationship management system (see section 12 for more information).

The law allows us to use the Personal Information as set out above on the basis that the processing is necessary in the following circumstances:

- on the basis that we are acting in our "legitimate interests", for example, for the purposes of effective business management;
- where we need to comply with a legal obligation; or
- more rarely, we may need to use your Personal Information in order to protect your vital interests, for example we may need to disclose information regarding your health to a hospital in the event of a medical emergency.

Marketing communications

AT Nolan may use your Personal Information to provide you with email notifications and other communications, including surveys, by telephone or post on the basis that such use is necessary for the purposes of the legitimate interests pursued by us, or in the case of your email notification subscription, in order for us to perform our contract with you. For further information on this, see the 'Your Choices' section of this Privacy Notice at paragraph 12.

Social media, promotional material and publications

We may use your Personal Information, including photographs, film and quoted statements taken at organised events, on site or on AT Nolan's internal and external communications, including for example on AT Nolan's website, internal Intranet (using, amongst other things, Open Asset (see Appendix V for details)) and published articles. We may also use the same information to promote AT Nolan's activities on social media platforms such as Twitter, Facebook and LinkedIn. Use of your Personal Information, including photographs and film containing your image for this purpose is on the basis of AT Nolan's legitimate interest in promoting and advertising its business.

Should you not wish for photographs or film containing your image or quoted statements (or other Personal Information) to be used for this purpose then you have a right to object to this processing. Please contact the AT Nolan Privacy Team admin@atnolan.co.uk to exercise this right or for more information.

However, please be aware that once an article or promotional material is published and in circulation (for example in a brochure or a Tweet) it may be copied and used by others. If you ask us not to use the photograph, film or quoted statements in future, we will comply with your request and we will do our best to stop others doing so, but we cannot guarantee this.

We will make efforts to notify you when photography and/or filming for this purpose is taking place at an event or on site where it is likely that such images will be posted internally or externally.

Combining Personal Information

We may combine the Personal Information that we collect from you (including information received from our affiliates) to the extent permitted by applicable law.

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

5. TO WHOM DO WE DISCLOSE YOUR INFORMATION AND WHAT DO WE DO TO KEEP YOUR INFORMATION SECURE?

We will only use your Personal Information for our internal business purposes, some of which are mentioned above. We do not sell any of your Personal Information to third parties. However, we may disclose your information to service providers, email support services, regulators, HMRC, legal teams, accountants and actuaries, to our public authority clients for the purposes of key performance indicator reporting and to all parts of the AT Nolan.

We have put in place appropriate physical and technical measures to safeguard the Personal Information we collect in connection with our Services. 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. However, please note that although we take appropriate steps to protect your Personal Information, no website, product, device, online application or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your Personal Information.

We are committed to ensuring all employees understand their responsibilities under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. To this end, we provide comprehensive data protection training to all staff members upon induction and through regular refresher courses. This training covers key principles of data protection, the importance of maintaining data confidentiality, integrity, and availability, and practical measures for data handling, storage, and sharing. Employees are also educated on recognising and responding to data breaches, as well as the procedures for reporting any data protection concerns. By equipping our staff with the necessary knowledge and skills, we aim to foster a culture of data privacy and security within our organisation.

We have implemented robust IT data security measures to protect personal and sensitive information from unauthorised access, alteration, disclosure, or destruction. Our IT infrastructure is safeguarded by firewalls that continuously monitor and defend against external threats. We employ antivirus and anti-malware programs to scan and remove potential threats regularly. All company laptops and mobile devices are password-protected and configured to require strong, unique passwords. Additionally, we enforce strict access controls to ensure that only authorised personnel can access sensitive data.

6. INTERNATIONAL TRANSFER OF DATA

The Personal Information that we collect from you may be stored and processed in your region, or transferred to, stored at or otherwise processed outside the European Economic Area ("**EEA**"), including but not limited to any other country where AT Nolan or AT Nolan Affiliates, subsidiaries or service providers maintain facilities.

By using or participating in any Service and/or providing us with your Personal Information, you acknowledge that we will collect, transfer, store and process your information outside of the EEA. We will take all steps reasonably necessary to ensure that your Personal Information is kept secure and treated in accordance with this Privacy Notice and the requirements of applicable law wherever the data are located. Where we transfer your Personal Information outside the EEA to other countries, we will ensure that appropriate transfer agreements and mechanisms (such as the EU Model Clauses) are in place to help ensure that our third party service providers provide an adequate level of protection to your Personal Information. We will only transfer your Personal Information outside the EEA in accordance with applicable laws or where you have given us your consent to do so.

7. DATA RETENTION – HOW LONG WE WILL STORE/KEEP YOUR PERSONAL INFORMATION

AT Nolan retains Personal Information for as long as necessary to fulfil the purposes for which your Personal Information has been collected as outlined in this Privacy Notice unless a longer retention period is required by law. When your Personal Information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law.

8. ACCESSING YOUR PERSONAL INFORMATION AND OTHER RIGHTS YOU HAVE

AT Nolan will collect, store and process your Personal Information in accordance with your rights under any applicable Data Protection Laws. Under certain circumstances, you have the following rights in relation to your Personal Information:

- I. Subject Access** - you have the right to request details of the Personal Information which we hold about you and copies of such Personal Information.
- II. Right to Withdraw Consent** – where our use of your Personal Information is based upon your consent, you have the right to withdraw such consent at any time. In the event you wish to withdraw your consent to processing, please contact us using the details provided below.
- III. Data Portability** – you may, in certain circumstances, request us to port (i.e. transmit) your Personal Information directly to another organisation.
- IV. Rectification** – we want to ensure that the Personal Information about you that we hold is

accurate and up to date. If you think that any information we have about you is incorrect or incomplete, please let us know. To the extent required by applicable laws, we will rectify or update any incorrect or inaccurate Personal Information about you.

- V. Erasure ('right to be forgotten')** - you have the right to have your Personal Information 'erased' in certain specified situations.
- VI. Restriction of processing** – you have the right in certain specified situations to require us to stop processing your Personal Information and to only store such Personal Information.
- VII. Object to processing** – You have the right to object to specific types of processing of your Personal Information, such as, where we are processing your Personal Information for the purposes of direct marketing.
- VIII. Prevent automated decision-taking** – in certain circumstances, you have the right not to be subject to decisions being taken solely on the basis of automated processing.

9. ENFORCING YOUR RIGHTS

If you wish to enforce any of your rights under applicable Data Protection Laws, then please contact us at admin@atnolan.co.uk. We will respond to your request without undue delay and no later than one month from receipt of any such request, unless a longer period is permitted by applicable Data Protection Laws, and we may charge a reasonable fee for dealing with your request which we will notify to you. Please note that we will only charge a fee where we are permitted to do so by applicable Data Protection Laws.

Complaints

If you are concerned that we have not complied with your legal rights under applicable Data Protection Laws, you may contact the Information Commissioner's Office (www.ico.gov.uk) which is the data protection regulator in the UK which is where AT Nolan is located. Alternatively, if you are based outside the UK, you may contact your local data protection supervisory authority.

10. THIRD-PARTY LINKS AND PRODUCTS ON OUR SERVICES

Our websites, applications and products may contain links to other third party websites that are not operated by AT Nolan, and our websites may contain applications that you can download from third parties. These linked sites and applications are not under AT Nolan's control and as such, we are not responsible for the privacy practices or the content of any linked websites and online applications. If you choose to use any third party websites or applications, any Personal Information collected by the third party's website or application will be controlled by the Privacy Notice of that third party. We strongly recommend that you take the time to review the privacy policies of any third parties to which you provide Personal Information.

11. COOKIES

What are cookies?

AT Nolan may use cookies and other technologies, including web beacons, action tags, pixel tags, in certain areas of our Services. Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. Cookies are assigned to and stored in a user's internet browser on a temporary (for the duration of the online session only) or persistent basis (cookie stays on the computer after the internet browser or device has been closed). Cookies collect and store information about a user's preferences, product usage, content viewed, and registration information which allows for AT Nolan to provide users an enhanced and customised experience when engaging with our Products. We may use cookies to store your preferences and settings, help you with signing in, provide targeted ads, and analyse site operations.

Further information on cookies

For further information on what cookies are, how AT Nolan and other third parties use them, and for details of how cookies can be disabled, please see our Cookie Policy.

12. YOUR CHOICES (E.G. MARKETING RELATED EMAILS OR OTHERWISE)

We and other AT Nolan Affiliates may use your Personal Information (such as your contact details (e.g. name, address, email address, telephone number)) to send you marketing-related correspondence by email, post or telephone call related to our Products, in accordance with your email and contact preferences in your Account Preferences and Personal Information sections of your AT Nolan website My Account or as you otherwise agree to. When we process your Personal Information for marketing purposes, we do so on the basis that it is in our legitimate interests to do so, or in the case of our email notification service, that it is necessary to perform our contract with you. You have a right to object to this processing. If you wish to do so, please contact the Privacy Team by email: admin@atnolan.co.uk

We may store information that you provide for the purposes of updating and maintaining our client relationship management system. We use a third party platform provided by Hubspot to manage and store this data. Information regarding Hubspot's security and safeguarding policies can be found at: <https://www.hubspot.com/>

We do not share Personal Information with third parties for the third parties' marketing purposes.

We may also use your Personal Information to personalise and to target more effectively our marketing communications to ensure, to the extent possible, that any marketing-related correspondence is relevant to you.

To opt out of receiving marketing-related correspondence from AT Nolan, please contact us or click "Unsubscribe" or text message (SMS) you receive from us.

13. CAREERS AND JOB APPLICANTS, CURRENT AND FORMER AT NOLAN EMPLOYEES

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any other third parties for marketing purposes. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format. In addition, if you provide special category data (e.g. ethnicity) as part of your application we will process this information for reasons of substantial public interest to monitor equality of opportunity or treatment only and will not be used in our decision-making process. As set out in our Equality, Diversity and Inclusion Policy, AT Nolan has a legitimate interest in ensuring that every individual is treated with fairness and respect and has access to equal opportunities, regardless of who they are.

We will use the contact details you provide to us to contact you to progress your application. We may also use the other information you provide (where relevant) to assess your suitability for the role you have applied for.

14. CHANGES TO THIS PRIVACY NOTICE

It is also important that you check back often for updates to the Privacy Notice, as we may change this Privacy Notice from time to time. The “Date last updated” legend at the bottom of this page states when the Privacy Notice was last updated and any changes will become effective upon our posting of the revised Privacy Notice.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. We will provide this notice by email or by posting notice of the changes on our website or through any relevant Services.

15. CONTACT US / FURTHER INFORMATION

We have appointed a GDPR Privacy Team who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the Privacy Team or the Data Protection Manager using the details set out below.

Contact details

Full details are:

Limited Email address: admin@atnolan.co.uk


Postal address:

Privacy Team
Unit 6 Platinum Road
Trafford Park
Urmston
M41 7LJ

If you have any questions regarding the collection, processing, or use of your Personal Information or if you wish to correct, block, rectify, object, access, revoke your consent to any applicable aspect of this Privacy Notice or delete any of your Personal Information, please contact us.

Date last updated: November 2020

Michael Fraser



Managing Director

20 November 2023