EXTERNAL PRIVACY NOTICE

1.0 PURPOSE AND SCOPE

This notice explains how Venables Associates Limited ("Venables Associates", "we", "us" or "our") collects, uses, shares and protects personal data relating to external contacts and visitors to our website. It applies regardless of whether information is collected through our website, by email, telephone, in person, through project correspondence or software, or from another relevant business or professional source.

It applies to prospective and current client contacts, contractors, suppliers, sub-consultants and members of the public. Separate privacy information applies to current and former employees, workers and job applicants.

2.0 WHO WE ARE

Venables Associates Limited is the data controller for the personal data described in this notice.

Registered address: Union House, 117 High Street, Billericay, Essex, CM12 9AH.

Data Protection Manager: Sean Grant, Director – dataprotectionofficer@venables.com.

3.0 PERSONAL DATA WE COLLECT

When you contact us, we may collect:

- your name, company name and job title;
- your email address and telephone number;
- the subject and details of your enquiry, project or request;
- correspondence and records of our communications with you;
- contract, quotation, order, billing or payment information where relevant; and
- any other information you choose to provide.

When you use our website, limited technical information may also be collected, including your IP address, browser or device information, pages visited and access times. Further information about cookies and your choices is provided in Section 5.0.

We usually obtain personal data directly from you. We may also receive business contact information from the organisation you represent, another member of a project team, or a publicly available professional source. We ask that you do not provide special category personal data unless it is relevant and necessary for your enquiry.

You are not legally required to provide personal data to make a general enquiry. However, we may be unable to respond, prepare a quotation, enter into or manage a contract, or deliver our services if you do not provide the information reasonably required for those purposes. Where information is necessary to enter into or perform a contract with you, its provision may be a contractual requirement.

4.0 HOW WE USE YOUR PERSONAL DATA AND OUR LAWFUL BASIS

We use personal data for the purposes and lawful bases set out below:

Purpose	Lawful basis under UK GDPR Article 6
Responding to enquiries and preparing quotes, tenders or proposals	Our legitimate interests in responding to business enquiries and developing our business. Where you contract with us as an individual, taking steps at your request before entering into a contract.
Managing client, contractor, supplier and project	Our legitimate interests in managing business relationships and

Purpose	Lawful basis under UK GDPR Article 6
relationships and delivering our services	delivering professional services. Where you are personally a party to the contract, performance of that contract.
Maintaining enquiry, correspondence and administrative records, and protecting our website and systems	Our legitimate interests in effective administration, record keeping, network and information security, and establishing or defending legal claims.
Complying with legal, regulatory and accounting requirements	Compliance with a legal obligation.
Using optional analytics, functional or advertising cookies, where enabled	Your consent, which you may withdraw through the website cookie settings.

Where we rely on legitimate interests, we consider whether our interests are proportionate and balanced against your rights and freedoms. We do not sell personal data.

5.0 COOKIES AND WEBSITE INFORMATION

Our website uses cookies that are necessary for it to operate securely and effectively. With your consent, we may also use optional functional, analytics or advertising cookies as described in the website cookie consent tool. You can accept, reject or change your choices through the cookie settings available on the website. Withdrawing consent does not affect processing that took place before withdrawal.

Our website may contain links to websites operated by other organisations. Their privacy practices are outside our control, and you should read their privacy information when visiting them.

6.0 SHARING PERSONAL DATA AND INTERNATIONAL TRANSFERS

Where necessary for the purposes described in this notice, we may share personal data with:

- Service providers supporting our website hosting, email, IT systems, cloud services and, where relevant, project delivery systems;
- Sub-consultants and other members of a project team where necessary to respond to an enquiry, prepare a proposal or deliver our services;
- Our professional advisers, auditors and insurers where reasonably necessary; and
- Courts, regulators, law-enforcement bodies or other public authorities where required or permitted by law.

Where a service provider processes personal data on our behalf, we require appropriate contractual, data protection and security obligations to be in place. Some service providers, or their sub-processors, may store or access personal data outside the United Kingdom. Where this involves a restricted international transfer, we ensure that an appropriate transfer mechanism is in place, such as applicable UK adequacy regulations or approved contractual safeguards. You may contact our Data Protection Manager for further information about the safeguards used or to request a copy of the relevant safeguards.

7.0 HOW LONG WE KEEP PERSONAL DATA

We retain records in accordance with VA PR 004 Control of Records Procedure. General enquiries that do not become a quotation, contractual relationship or another controlled business record are retained only for as long as reasonably necessary to respond to and close the enquiry, taking account of any legal, regulatory or potential claims requirements.

The principal retention periods relevant to this notice are:

- Quotations – retained indefinitely;
- Service-delivery records – 12 years;
- Sales invoices – 12 years;
- Purchase invoices – 12 years and, where required under the procedure, indefinitely;
- Purchase orders – retained indefinitely; and
- Insurance records – 12 years.

At the end of the applicable retention period, paper records are securely shredded and electronic records are securely deleted. Records subject to indefinite retention remain subject to access controls and review against applicable data protection requirements. Website and cookie information is retained for the periods described in the website cookie settings or applicable supplier information.

8.0 YOUR RIGHTS

Depending on the circumstances, UK data protection law gives you the right to:

- Request access to the personal data we hold about you;
- Ask us to correct inaccurate or incomplete personal data;
- Request erasure of your personal data in certain circumstances;
- Request restriction of our processing in certain circumstances;
- Object to processing based on legitimate interests, including on grounds relating to your particular situation;
- Receive personal data you provided to us in a portable format, where the right to data portability applies; and
- Withdraw consent at any time where processing is based on consent, without affecting earlier lawful processing.

To exercise a right, please contact our Data Protection Manager using the details in Section 2.0. We may need to verify your identity. You also have the right to complain to the Information Commissioner's Office (ICO) at ico.org.uk if you are dissatisfied with how we have handled your personal data.

9.0 SECURITY OF PERSONAL DATA

We maintain appropriate technical and organisational measures designed to protect personal data against accidental or unlawful loss, alteration, disclosure, access or destruction. These measures are supported by our Information Security Management System, which is aligned with ISO/IEC 27001:2022.

10.0 AUTOMATED DECISION-MAKING AND CHANGES TO THIS NOTICE

We do not make solely automated decisions producing legal or similarly significant effects, or profile individuals for that purpose. We may update this notice to reflect changes in our practices or legal requirements. The current version will be published on our website and a PDF copy will be available on request.