



Osborne Privacy Policy

INTRODUCTION

Who We Are

For the purpose of this Privacy Policy “you” or “your” means any end user accessing or receiving our services or our Website (as defined below), “we” or “us”, “our” or “Osborne” means Osborne Group Holdings Ltd registered in England and Wales under company number 11056197 with registered office at Fonteyn House, 47-49 London Road, Reigate, Surrey, RH2 9PY.

What We Do

We provide services in the UK across many sectors ranging from the built environment in design, to project management, property maintenance, construction, property development and investment. We work across housing, offices, the railways, hospitals, student accommodations, roads, airports, civic buildings, public realm, schools, colleges and universities.

How We Process Personal Data

This Privacy Policy, together with our Cookies Policy available at <https://www.osborne.co.uk/cookies-policy/> (the “**Cookies Policy**”) and any other documents referred to in it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This Privacy Policy also sets out how you can instruct us if you prefer to limit the use of that personal data and the procedures that we have in place to safeguard your privacy.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of this Privacy Policy, Data Protection Legislation means, the Data Protection Act 1998 (the “**DPA**”) and from 25 of May 2018, the General Data Protection Regulation 2016/679 (the “**GDPR**”) until any UK data protection legislation replaces or adopts the GDPR in the UK. For the purposes of the Data Protection Legislation we are the data controller. By using or accessing our Website at www.osborne.co.uk (the “**Website**”) or using our services you signify your consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy. If you do not agree with this Privacy Policy, you must not use our services, access the Website or submit information to us through or in connection with our services, the Website or otherwise.

1 Information We May Collect From You

1.1 Information you give us (Submitted Information):

- 1.1.1 This includes information that you provide by filling in forms and submitting information to us, by e-mail or through our services or the Website, when you register to use our services, subscribe to any one of our services, through surveys, or by requesting further services.



POLICIES & STATEMENTS



1.1.2 The information you give us may include your:

- (a) name and address,
- (b) e-mail address,
- (c) username, password,
- (d) financial information (e.g. when you purchase or order any of our services); and
- (e) your phone number.

1.1.3 Records of communications between you and us relating to services provided by us to you. If you contact us, whether through our services, the Website, our call centre or otherwise we may keep a record of that correspondence or conversation. For example, if you submit a query, a complaint, report a problem with our service, Website, or otherwise liaise with our customer service, technical support or any other department in our company we may keep a record.

1.1.4 We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

1.1.5 We may also collect information from candidates applying for a job with us (e.g. by submitting a form or sending a CV to us).

2 Information we collect about you

2.1 Each time you visit our Website or use our services we may collect the following information:

2.1.1 Details of your use and your visits to our Website including, but not limited to traffic data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise ("**Log Information**").

2.1.2 Your contact details such as your e-mail address, forename and surname ("**Contact Details Information**").

2.1.3 Information we receive from other sources ("**Third Party Information**"). We are working closely with third parties (including, for example, local councils and boroughs, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies, etc).

2.2 We may check some of the information that you provide against third party databases to confirm that it is accurate.



POLICIES & STATEMENTS



2.3 We may have access to your billing address and payment history in order to assist with customer service enquiries. Under no circumstances are these details disclosed to any third parties other than those who need to know this information for the performance of the services requested by you.

3 How We May Use The Information Collected From You

3.1 We may process this information for the purpose of:

3.1.1 Delivering services we provide in partnership with local councils, boroughs, universities, and other public institutions (e.g. social housing property maintenance and refurbishment services);

3.1.2 Engaging with you if you participate in our community programmes that aim to promote jobs, education and community initiatives;

3.1.3 Providing you access to all parts or features of our services, or the Website;

3.1.4 Dealing with your enquiries and requests, including contacting you where necessary;

3.1.5 Carrying out our obligations arising from any contracts entered into between you and us;

3.1.6 Administering registration records (including reminders, e.g. to update your payment details);

3.1.7 Contacting you for your views on our services and notifying you occasionally about important changes or developments to our services, or to the Website;

3.1.8 Carrying out market research campaigns or surveys;

3.1.9 Sending you marketing material regarding services we provide;

3.1.10 Ensuring that content from our Website is presented in the most effective manner for you and for your computer or mobile device; and

3.1.11 Debt recovery or debt tracing, crime, fraud and money laundering compliance.

3.2 We will only contact you by e-mail or by telephone with promotional material relating to services similar to those which were the subject of a previous sale to you. You will be entitled to opt out from this by contacting us or by clicking "unsubscribe" in the electronic communication you receive.

3.3 We will not pass your details on to third parties for marketing or advertising purposes.



POLICIES & STATEMENTS



- 3.4 We may also gather information and statistics for the purposes of monitoring the usage of the Website and our services and may provide such anonymised information to third parties. These statistics will not include information that can be used to identify you.
- 3.5 If you choose to post messages on any online forum or other message platforms that we may make available for this purpose on the Website, we may collect that information you provide to us, on or via those forums and platforms. We may retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems, as permitted by law.
- 3.6 If you stop using our services or our Website, or your permission to use the Website or our services is terminated, we may continue to use and disclose your personal information in accordance with this Privacy Policy (as amended from time to time) and as permitted by the Data Protection Legislation. However, if you wish us to stop e-mailing you with information in connection with the Website or our services, please send your request in accordance with paragraph 13 below.
- 3.7 We may contract out part of our services plus other ancillary services such as hosting, billing, and verification of sales. We may disclose your personal information to other organisations so that they can provide you with the services that we have contracted out.

4 Information Security

- 4.1 The Internet is not a secure medium. However, we have put in place various security procedures with regards to the Website and your electronic communications with us, as set out in this Privacy Policy.
- 4.2 Please be aware that communications over the Internet, such as e-mails/webmails are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered – this is the nature of the Internet.
- 4.3 We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.
- 4.4 We believe that we have appropriate policies, rules and technical measures to protect the personal data that we have under our control (having regard to the type and amount of that data) from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss.
- 4.5 All of our employees and data processors that have access to, and are associated with, the processing of your personal information are obliged to respect the confidentiality of our users' information.
- 4.6 We ensure that your information will not be disclosed to government institutions or authorities except if required by law or when requested to by regulatory bodies or law enforcement organisations.





5 To Whom Will Your Information Be Disclosed?

- 5.1 Your information may, for the purposes set out in this Privacy Policy, be disclosed for processing to:
- 5.1.1 Our employees;
 - 5.1.2 Our subcontractors;
 - 5.1.3 Your local council or borough (or other public institutions) for services we provide to you in partnership with them;
 - 5.1.4 Any member of our group companies and their employees, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006;
 - 5.1.5 Successors in title to our business;
 - 5.1.6 A prospective seller or buyer in the event that we sell or buy any business or assets, in which case we will disclose your personal data to such business or assets;
 - 5.1.7 Third party consultants, contractors or other service providers who may access your personal information when providing services (including but not limited to IT support services) to us;
 - 5.1.8 Government bodies and law enforcement agencies and in response to other legal and regulatory requests, if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request;
 - 5.1.9 Auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes or processes;
 - 5.1.10 To any third party where such disclosure is required in order to enforce or apply our end user terms, and/or other agreements; or to protect the rights, property, or safety of our company, our customers, or others but always in accordance with applicable laws;
 - 5.1.11 Protect the rights, property or safety of Osborne, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction; and
 - 5.1.12 Subject to the limitations in paragraphs 3.2 to 3.7 above, to carefully selected third parties that may contact you about products and services which may be of interest to you.





6 Your Rights In Relation To Your Information

6.1 You can write to us at any time to obtain a copy of your information and to have any inaccuracies corrected. Please write to: dataprotection@osborne.co.uk. Where appropriate under Data Protection Legislation, you may have your personal information erased, rectified, amended or completed as specified below:

- (a) *Access*: you are entitled to be provided with a copy of the information we hold about you.
- (b) *Deletion*: you have the right to ask us to delete personal information we hold about you though please bear in mind that we may need to keep all or part of your data in accordance with applicable Data Protection Legislation (e.g. if we need to keep all or part of your data to comply with our legal obligations, for record keeping or to keep providing you any of our services).
- (c) *Rectification*: you are entitled to have any inaccuracies in the information we hold about you corrected.
- (d) *Withdraw consent*: you have the right to withdraw your consent to any particular use of your data.
- (e) *Information*: you have the right to be informed of the use to which your personal data is put.
- (f) *Restriction*: under certain circumstances specified by Data Protection Legislation, you have the right to request us to restrict the processing of your personal data, or we may restrict the processing of your data (e.g. if you claim your data is inaccurate, you object to the processing of your personal data and we are considering your request, if processing is unlawful and you oppose erasure and request restriction instead, etc.)
- (g) *Object*: you have the right to object to our processing of your personal data based: (i) on our legitimate interests or the performance of a task in the public interest; (ii) direct marketing (including profiling); (ii) processing for purposes of scientific/historical research and statistics.
- (h) *Portability*: you have the right to request us to provide you with your personal data in a structured, commonly used and machine readable form and to ask us to transmit the data directly to another organisation if this is technically feasible.

6.2 Requests must be made in writing. Please quote your name and address. We should be grateful if you would also provide brief details of the information of which you would like a copy or which you would like to be corrected (this helps us to more readily locate your data).



POLICIES & STATEMENTS



6.3 We will require proof of your identity before providing you with details of any personal information we may hold about you.

6.4 We may only request a reasonable fee from you when your request is manifestly unfounded or excessive or repetitive or we receive a request to provide further copies of the same information.

7 Cookies

We use cookies to distinguish you from other users of the Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. For detailed information on these cookies, the way we use them and the purposes for which we use them, please see our cookie policy <https://www.osborne.co.uk/cookies-policy/>.

8 Where We Store And Process Your Information

8.1 The data that we collect from you will be stored at a destination within the European Economic Area ("EEA"). It will be processed by staff operating within the EEA who work for us or for one of our suppliers or affiliates. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

9 Your Consent And Changes To This Privacy Policy

9.1 By submitting any personal information (including, without limitation, your payment details) to us you consent to the use of information as set out in this Privacy Policy. We reserve the right to amend or modify this Privacy Policy and if we do so we will post the changes on our Website. It is your responsibility to check the Privacy Policy every time you submit information to us. Your use of the Website or our services will signify that you agree to any such changes.

9.2 In the event the purposes for which we process personal information changes, then we will contact you as soon as practicable and seek your consent, where such notification relates to a new additional purpose for processing which is not compatible with, or similar to, the originally specified purposes.

10 Use Of Your Personal Information Submitted To Other Apps or Websites

10.1 We are not responsible for the privacy policies and practices of other apps or websites even if you accessed the third party website or app using links from our Website or by means of our services.

10.2 We recommend that you check the policy of each website or app you visit and contact the owner or operator of such website or app if you have concerns or questions.





11 Data Retention

11.1 We will keep your data for as long as: (i) you have consented to it; or (ii) it is necessary for us to provide you with our services or to comply with our obligations under applicable law (such as tax and accounting rules), this Privacy Policy, or under our end user terms; (iii) it is required in respect to the purposes for which such information was provided to us, including where you have given us permission to use it to contact you in the future for marketing purposes.

12 Applying For A Job Online Or Sending Us Your CV

12.1 When you apply for a job online you will have to provide us with detailed personal information. Our People Team will retain this information for at least six months to enable us to deal with enquiries about your application, after which time it will be destroyed. If you are not selected for the post but are a preferred candidate we may contact you again should a suitable vacancy arise. Likewise if you send us your CV speculatively we may contact you should a suitable vacancy arise.

13 Further Information

13.1 For complaints or for requesting further information from us on data protection and privacy or any requests concerning your personal information please write to the Data Protection Officer, Geoffrey Osborne Ltd Fonteyn House, 47-49 London Road, Reigate, Surrey, RH2 9PY or e-mail us at dataprotection@osborne.co.uk or call us on 07392 094381.

13.2 You can also contact the Information Commissioner's Office if you have a complaint regarding your personal data that we cannot resolve. Their website address is:

<https://www.gov.uk/government/organisations/information-commissioner-s-office>

