

DATA PROTECTION POLICY

Established in 1897, we are the UK's leading family-owned development, building and property maintenance company. We employ over 4,000 people and work with a wide range of public and private sector customers and partners. Now in our fourth generation of family ownership, we're committed to the long-term sustainability of the built environment and to making our industry more inclusive and representative of the communities we work in. We are driven by our shared purpose of working together to inspire better ways of creating the places, communities and businesses of tomorrow.

The fair and efficient collection, processing, use and retention of personal data for business purposes is crucial in facilitating Wates high-level of service. This enables us to:

- Achieve our stated targets and goals
- Ensure we remain the service provider of choice

Our approach to data protection is one of sensible risk management which is driven by our Guiding Framework. We process the personal data of our employees, of visitors to our website, job applicants, any individual who signs up to receive our business email notifications.

We may process the personal data of representatives of our clients in connection with the provision of our services. We hold the protection of this personal data that we process and control in the highest regard and comply with all legal requirements.

We are committed to ensuring that individuals trust us to use their data fairly and responsibly and to continually develop, review and maintain our policies and procedures in relation to data protection to improve our performance in this area.

We provide individuals with information about how we process their personal data in a clear, accessible and easy to understand way.

This includes the purpose for data processing, any retention period, an individual's personal rights and who the data might be shared with. All this information can be found in our Privacy Notices.

In adhering to this policy, we will:

- Implement a privacy by design and default approach - this considers data protection from the design stage and continuously throughout the lifecycle
- Use a support network of nominated data protection leads to help implement and maintain data protection policies at an operational level. This will assist us in demonstrating our accountability measures in relation to data protection compliance
- Implement, maintain and continually improve our policies, procedures, rules and guidance to ensure adherence with all principles of data protection, to include:
 - » Lawfulness, fairness and transparency
 - » Purpose limitation
 - » Data minimisation
 - » Accuracy
 - » Storage
 - » Integrity and confidentiality (Security)
 - » Accountability
- Provide information to individuals about how they can exercise their rights in relation to data protection and follow adequate processes to respond to any requests relating to data
- Follow appropriate technical and organisational measures to meet our requirements around accountability
- Provide sufficient training on data protection for our employees

This policy applies to all our employees and those working with us or on our behalf. Successful implementation requires everyone to cooperate, commit and assist us to ensure that data protection issues and risks are given adequate consideration.

The Executive Committee has overall responsibility for ensuring this policy is complied with. It will be reviewed at least once a year and at such other times as may be required, to ensure it remains relevant and appropriate to the aims and objectives of our business.

For and on behalf of the Executive Committee



EOGHAN O'LIONAIRD
Chief Executive
May 2023