

DATA RETENTION 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.

To carry out all our operations successfully, Wates is required to collect, store and process a large number of documents and records. We are committed to all these being treated in an appropriate and lawful manner which enables us to:

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

Our approach to data retention is one of sensible risk management which is driven by our Guiding Framework. We take the retention of documents seriously and we will comply with all legal requirements.

We are committed to ensuring that personal data is not kept for longer than is needed. We are always able to justify how long we keep personal data subject to the purposes for which it is held.

We are committed to ensuring that business records are retained in accordance with any statutory legislative requirements and will not be kept unnecessarily. Non business records will be disposed of when they are no longer useful for the purpose for which they were created.

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

- Implement, maintain and continually improve our policies, procedures, rules and guidance to support adherence with the principles of:
 - » Data retention
 - » Data protection
 - » Information and Data Security
- Manage and maintain a data retention schedule
- Store and file documents and records in a structured way that permits easy identification, retrieval, and disposal
- Manage and store information in a secure way
- 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 retention 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