

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 reimagining places for people to thrive.

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. We take the retention of documents seriously and we will aim to comply with all legal requirements.

We have retention periods in place and always aim to maintain personal data in line with our data retention schedule.

Our rules and procedures set out that personal data should not be retained for longer than is necessary and that business records should be retained in accordance with any statutory requirements. Non business records should 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, June 2024

