



Client Privacy Notice

Introduction

This is the Client Privacy Notice of Willow Services (Southern) Ltd. Companies House No. 08124360, registered at 6 Westbrooke Close, Waterlooville, Hampshire, PO8 9RE. Willow Services (Southern) Ltd. Limited are registered as data controllers with the Information Commissioner for the United Kingdom.

When you use our services, you trust us with your personal information. This Privacy Notice is meant to help you understand what personal data we collect, why we collect it, what we do with it, how we keep your personal data safe, and your individual rights over your personal data.

We are strongly committed towards the privacy of sensitive information, acting transparently and meeting our obligations in respect of data protection. Whenever you provide personal information, we will treat that information in accordance with this Privacy Notice, relevant legislation and best practice.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

What personal data does Willow Services (Southern) Ltd. collect?

We may collect personal information about you in a variety of ways, such as through telephone conversations, email correspondence or via our website for operational use.

We may collect and process the following information while working with our clients:

- Your first name and surname
- Company name, if relevant
- Company address or contact address, if you are a private homeowner;
- Contact details, including email address and mobile and landline telephone numbers

Willow Services (Southern) Ltd.

Suite 317, Victory Business Centre, Somers Road North, Portsmouth, Hampshire, PO1 1PJ

www.willow-services.co.uk

Office: 07929 058048

Company Reg. No. 08124360

- Project details, including development proposals
- The terms and conditions of your contract
- Details of your project type and sector
- Project Purchase Order number (where provided)
- Project budgets
- Staffing, equipment and resources spent on a project
- Project email correspondence
- Financial details (invoicing address and bank account details for the return of any overpayments)

Willow Services (Southern) Ltd. does not collect or process special categories of personal data i.e. particularly sensitive information about its clients at any point, such as ethnic origin, sexual orientation or religious and/or political beliefs

Why do you need to process personal data?

Willow Services (Southern) Ltd. needs to process personal data to communicate with potential clients, or to enter into a contract with its clients as part of formal instruction to proceed with our services, and to meet our obligations under this contract to deliver those services. For example, we may need to provide you with an appropriate fee proposal and our Terms and Conditions; contact you about the progress of your project and make suitable recommendations; or use your data for accounting purposes

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations, such as to comply with health and safety laws. In other cases, the Company has a legitimate interest in processing client data before, during and after the end of the contracting relationship

Processing client data allows the Company to:

- Maintain accurate and up-to-date client records and contact details
- Provide effective project management in terms of budget, timescales and client communication
- Operate and keep a record of project progress, and plan for resourcing
- Operate and keep of record of project budgets to ensure clients are invoiced accordingly and to provide feedback for the preparation of fee proposals for similar projects in the future
- Operate and keep a record of client feedback and records of unsuccessful fee proposals to assist in improving the services of the Company
- Undertake site specific project risk assessments to ensure we meet our obligations under health and safety law
- Ensure effective general business administration
- Respond to and defend against legal claims

Where the Company relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of clients and has concluded that they are not

Do I have to provide personal data?

For Willow Services (Southern) Ltd. to deliver its services to you, you are required to enter into a contract with us. You have some obligations under your contractual agreement with Willow Services (Southern) Ltd. to provide us with certain data

You are required to provide relevant and accurate contact details for us to enter into a contract with you, as well as invoicing details for operational use. If you do not provide this information, this will hinder the Company's ability to administer any rights and obligations arising as a result of the Company/client relationship

It is in your best interests to provide all relevant information pertaining to the project, which is likely to affect the proposed development works and the project outcome. Failing to provide this data may mean that we are unable to fulfill our contractual obligations to you

Who can access personal data?

We disclose client data for the purposes of operational use with Willow Services (Southern) Ltd. employees, including the Directors, the Company Manager, the assigned project manager, the technical and administration teams and the Finance Officer (for invoicing and/or debt collection purposes)

If necessary, the Company will share your data with third parties such as solicitors and Courts for the purposes of debt collection, or with third parties that process data on our behalf, such as for the purposes of end of year accounting.

We will never sell your details to a third party or transfer your data to countries outside the European Economic Area

How does WILLOW SERVICES (SOUTHERN) LTD. protect personal data?

Willow Services (Southern) Ltd. takes the security of your data very seriously. The Company has internal policies and controls in place to ensure as is reasonably practicable that your data is not lost, accidentally destroyed, misused or disclosed to irrelevant third parties, and that your data is only accessed and used by Willow Services (Southern) Ltd. employees in the performance of their duties. Electronic client data is stored securely via a secure server and password protected systems. Hardcopy information is locked away when not in operational use. Data is subject to restricted access as appropriate.

Where the Company engages third parties to process personal data on its behalf in the course of its business operations, such parties do so on the basis of written instructions,

are under a duty of confidentiality and are obliged to implement appropriate measures to ensure the security of data held

How long does Willow Services (Southern) Ltd. keep personal data?

Willow Services (Southern) Ltd. will hold your personal data for the duration of your contract with us. The period for which your data is held after the end of the contract is six years from the last action of the contract.

Six years is considered an adequate time period to store client data related to past projects given the long-term nature of planning applications (the majority of planning applications need to be implemented within three years). Where we have to work within the monitoring requirements of Natural England European Protected Species (EPS) Licences, this can extend the period to up to ten years depending of the value and status of the protected species supported by the site.

Your Rights

As a data subject, you have rights over your personal data collected by us.

You can:

- Access and obtain a copy of your data on request
- Require the Company to change incorrect or incomplete data
- Require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- Object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing;
- Ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data; and/or
- Ask the Company not to process your personal data for marketing purposes and to ask us not to share your personal data with third parties other than our employees

We can provide details of personal data we hold about you on receipt of a written request, verification of your identity and payment of a fee of £10.00 (by cheque or BACS transfer only)

If you would like to exercise any of the above rights, please put your request in writing via email to Lily McKenna, HR Administrator, at admin@willow-services.co.uk or write to us at: Willow Services (Southern) Ltd., Suite 317, Victory Business Centre, Sommers Road North, Portsmouth, Hampshire, PO1 1PJ.

If you believe that the Company has failed to produce a satisfactory response and has not

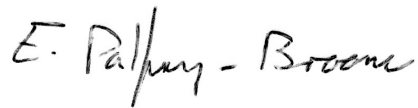
complied with your data protection rights, you have the right to complain to the Information Commissioner. For more advice and information you can visit <https://ico.org.uk/concerns/>.

Changes to our Client Privacy Notice

We may modify our Client Privacy Notice from time to time at our sole discretion; if so, we will post a revised version of this Client Privacy Notice on our website. We urge you to check this notice regularly to obtain the most up to date copy. Modifications will be effective as soon as they are posted on the website.

Contact Us

If you have any comments or queries in connection with our Client Privacy Notice, please email admin@willow-services.co.uk or write to: Willow Services (Southern) Ltd., Suite 317, Victory Business Centre, Sommers Road North, Portsmouth, Hampshire, PO1 1PJ.



Edward Palfrey-Broome
Financial Director