

The Harris Group (incorporating The Harris Partnership Ltd, Harris Project Management Ltd, Vector Design Concepts and Smeeden Foreman Ltd).

### **BACKGROUND:**

The Harris Group understands that your privacy is important to you and that you care about how your Personal Data is used and shared. We respect and value the privacy of everyone we work with and everyone who visits our websites: [www.harrispartnership.com](http://www.harrispartnership.com), [www.harrispm.com](http://www.harrispm.com), [www.vectordc.com](http://www.vectordc.com) and [www.smeedenforeman.co.uk](http://www.smeedenforeman.co.uk) ("Our Sites"). We will only collect and use Personal Data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Notice carefully and ensure that you understand it. If you do not accept and agree with this Privacy Notice, you must stop using Our Sites and/ or notify our GDPR Officer immediately.

### **1. Definitions and Interpretation**

In this Policy, the following terms shall have the following meanings:

<b>"Account"</b>	means an account required to access and/or use certain areas and features of Our Sites;
<b>"Cookie"</b>	means a small text file placed on your computer or device by Our Sites when you visit certain parts of Our Sites and/ or when you use certain features of Our Sites. Details of the Cookies used by Our Sites are set out in section 13, below;
<b>"Cookie Law"</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
<b>"Personal Data"</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
<b>"We/Us/Our"</b>	means The Harris Group Ltd, a limited company registered in England under company number 04226074, whose registered address is 2 St. John's North, Wakefield, WF1 3QA, and whose main trading address is 2 St. John's North, Wakefield, WF1 3QA. The Harris Group Ltd incorporates the following companies "The Harris Partnership Ltd" (01818226), "Harris Project Management Ltd" (04182755) and "Vector Design Concepts (division of The Harris Partnership Ltd)".

### **2. Information About Us**

- 2.1 Our Sites are owned and operated by The Harris Group Ltd including The Harris Partnership Ltd (VAT number 40485553), Harris Project Management Ltd (VAT number 829575875), Vector Design Concepts (VAT number 40485553) and Smeeden Foreman Ltd (VAT number 568851503)
- 2.2 Our GDPR Officer is Stephanie Woolley who can be contacted by email at [dataprotect@harrispartnership.com](mailto:dataprotect@harrispartnership.com) by telephone on 01924 291 800, or by post at 2 St. John's North, Wakefield, WF1 3QA.

### 3. **What Does This Policy Cover?**

This Privacy Notice includes contact and company information we hold for you and information collected during your use of Our Sites. Our Sites may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### 4. **Your Rights**

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of Personal Data have been designed to uphold:
  - 4.1.1 The right to be informed about Our collection and use of Personal Data;
  - 4.1.2 The right of access to the Personal Data We hold about you (see section 12);
  - 4.1.3 The right to rectification if any Personal Data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
  - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any Personal Data We hold about you (We only hold your Personal Data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
  - 4.1.5 The right to restrict (i.e. prevent) the processing of your Personal Data;
  - 4.1.6 The right to data portability (obtaining a copy of your Personal Data to re-use with another service or organisation);
  - 4.1.7 The right to object to Us using your Personal Data for particular purposes; and
  - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your Personal Data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

### 5. **What Data Do We Collect?**

We may collect some or all of the following Personal Data (please also see section 13 on Our use of Cookies and similar technologies):

- 5.1 name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 business/company name;
- 5.5 job title;
- 5.6 profession;
- 5.7 contact information such as email addresses and telephone numbers;
- 5.8 demographic information such as post code, preferences, and interests;
- 5.9 financial information such as credit / debit card numbers;
- 5.10 IP address;
- 5.11 web browser type and version;

- 5.12 operating system;
- 5.13 a list of URLs starting with a referring site, your activity on Our Sites, and the site you exit to.

## 6. How Do We Use Your Data?

- 6.1 All Personal Data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your Personal Data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your Personal Data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
  - 6.2.1 Providing and managing your access to Our Sites;
  - 6.2.2 Personalising and tailoring your experience on Our Sites;
  - 6.2.3 Supplying Our services to you (please note that We require your Personal Data in order to enter into a contract with you);
  - 6.2.4 Personalising and tailoring Our services for you;
  - 6.2.5 Replying to emails from you;
  - 6.2.6 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time);
  - 6.2.7 Market research;
  - 6.2.8 Analysing your use of Our Sites and gathering feedback to enable Us to continually improve Our Sites and your user experience;
  - 6.2.9 Keeping current and archived project records of project team contact information.
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email or telephone or text message or post with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 Third parties whose content appears on Our Sites may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 6.5 You have the right to withdraw your consent to Us using your Personal Data at any time, and to request that We delete it.
- 6.6 We do not keep your Personal Data for any longer than is necessary in light of the reason(s) for which it was first collected.

## 7. How and Where Do We Store Your Data?

- 7.1 We only keep your Personal Data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it and it is stored in a secure online database system.
- 7.2 Your data will only be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Sites.

## 8. Do We Share Your Data?

- 8.1 We may share your data with other companies in Our group. This includes Our holding company and its subsidiaries.
- 8.2 We may compile statistics about the use of Our Sites including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 8.3 We may sometimes use third party data processors that are located outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any Personal Data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:
  - 8.3.1 Google Analytics
- 8.4 In certain circumstances, We may be legally required to share certain data held by Us, which may include your Personal Data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

## 9. What Happens If Our Business Changes Hands?

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any Personal Data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Notice, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- 9.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

## 10. How Can You Control Your Data?

- 10.1 When you submit Personal Data via Our Sites, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).
- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 11. Your Right to Withhold Information

- 11.1 You may access certain areas of Our Sites without providing any data at all. However, to use all features and functions available on Our Sites you may be required to submit or allow for the collection of certain data.
- 11.2 You may restrict Our use of Cookies. For more information, see section 13.

## 12. How Can You Access Your Data?

You have the right to ask for a copy of any of your Personal Data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us using the contact details below in section 14.

## 13. Our Use of Cookies

- 13.1 Our Sites may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Sites and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and Personal Data is protected and respected at all times.
- 13.2 By using Our Sites you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. These Cookies are not integral to the functioning of Our Sites and your use and experience of Our Sites will not be impaired by refusing consent to them.
- 13.3 All Cookies used by and on Our Sites are used in accordance with current Cookie Law.
- 13.4 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Sites may not function fully or as intended.
- 13.5 Certain features of Our Sites depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed below in section 13.7, but please be aware that Our Sites may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 13.6 The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Duration
moove_gdpr_popup	When this Cookie is enabled, these Cookies are used to save your Cookie Setting Preferences.	1 year
hustle_module_show_count-popup-3	We have a pop up appearing on the website to sign up to our mailing list, if users dismiss the cookie without signing up, the same user will not see the pop up again for the rest of the session.	24 Hours
inc_optin_popup_long_hidden-3	The viewed_cookie_policy cookie is set to "yes" when the Cookie law info bar has been viewed and accepted.	1 year
TS01a0c22a	a session identifier for internal web site use	Session
BIGipServerTethys	used for load balancing on the site server	Session
viewed_cookie_policy	The viewed_cookie_policy cookie is set to "yes" when the Cookie law info bar has been viewed and accepted.	1 year

and the following third party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Duration
NID	google.com	6 months
_twitter_sess	twitter.com	Session
personalization_id	twitter.com	2 Years
guest_id	twitter.com	2 Years
external_referer	twitter.com	7 days
ct0	twitter.com	Persistent
JSESSIONID	linkedin.com	Session
lang	linkedin.com	-
bcookie and bscookie	linkedin.com	1 Year
Lidc and leo_auth_token	linkedin.com	1 Day
Visit	linkedin.com	2 Years

13.7 Our Sites may use analytics services. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Sites are used. This, in turn, enables Us to improve Our Sites and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Sites, it does enable Us to continually improve Our Sites, making them a better and more useful experience for you.

13.8 The analytics service used by Our Sites uses Cookies to gather the required information.

13.9 The analytics service used by Our Sites uses the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	Third	Google Analytics	To distinguish users.
_gid	Third	Google Analytics	To distinguish users.
_gat	Third	Google Analytics	To throttle request rate.
UID	Third	scorecardresearch.com	For anonymous usage statistics.
UIDR	Third	scorecardresearch.com	For anonymous usage statistics.

13.10 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

13.11 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Sites more quickly and efficiently including, but not limited to, login and personalisation settings.

13.12 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

#### 14. **Contacting Us**

If you have any questions about Our Sites or this Privacy Notice, please contact Us by email at [dataprotect@harrispartnership.com](mailto:dataprotect@harrispartnership.com) by telephone on 01924 291 800, or by post at 2 St. John's North, Wakefield, WF1 3QA. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 12, above).

#### 15. **Changes to Our Privacy Notice**

We may change this Privacy Notice from time to time (for example, if the law changes). Any changes will be immediately posted on Our Sites and you will be deemed to have accepted the terms of the Privacy Notice on your first use of Our Sites following the alterations. We recommend that you check this page regularly to keep up-to-date.

Signed



Gary Humphreys  
Joint Managing Director

Signed



James Richmond  
Joint Managing Director