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SLR GLOBAL LTD PRIVACY NOTICE

July 2020

Introduction

This privacy notice informs you of why, how and when SLR collects Personal Data and lets you know how your personal data will be used.

"Personal Data" is any information relating to an identified or identifiable natural person (called a "data subject").

An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

Information about us

The SLR Group (SLR), has its headquarters in the UK. SLR Global Ltd is the parent company of the group. The registered address is: 7 Wornal Park, Menmarsh Road, Worminghall, Aylesbury, Bucks HP18 9PH. SLR has operations in Africa, Asia-Pacific, Canada, Europe and the United State of America.

SLR Group Commitment

SLR is committed to maintaining the privacy of Personal Data of all individuals with whom we interact and to comply with the provisions of the UK Data Protection Act 2018 (DPA).

This privacy notice applies directly to those

SLR Group Companies operating within the European Economic Area but is also applicable to SLR Group Companies outside of the European Economic Area with whom we may transfer data. Under such circumstances, SLR Consulting Ltd will act as representative for the purposes of compliance with the DPA.

Why do we collect personal data/information?

We collect this information to enable us to establish or maintain a working relationship with you or process a request you have made to us, such as:

- To ask us to provide you with one or more of the services we offer ?
- During the execution of a contract between us
- To enable us to advise you of new or improved services we can provide
- If you want to become an Approved Supplier to SLR
- If we want to purchase goods or services from you

• To employ you (including what the legislation calls "Special Category Data" such as health, ethnicity etc)

How do we collect this information?

We may collect or obtain information about you from different places including:

- directly from you
- from a third party acting on your behalf e.g. an intermediary or broker
- from publicly available sources
- when we generate it ourselves
- from other organisations.

We will only collect information about you in line with relevant regulations and law.

We do not capture or store any personally-identifying information (such as your e-mail address, name, title, or postal address) without your knowledge when you visit our website. (See section on Cookies below for further details). You are always able to choose whether or not to provide such information to us.

How we might use your information

General Use

We may use your information in a variety of different ways dependent on why it has been provided. For example:

- To enable us to communicate with you in connection with the activities for which you have provided us data
- To store data related to any contract we have entered in to or are considering entering in to
- To keep you up to date with our service offerings
- To store data relating to your employment with SLR
- To provide information to HMRC (or other relevant government tax authority) which we are legally obliged to do

Any data you do provide, via our enquiry form or as part of our working relationship with you, will be treated in the strictest confidence and held securely. We will only use your data for the activities that it has been provided for or you have consented to.

From our Website

Website Visitor Tracking

To maintain and improve site quality and integrity, website usage is tracked by Google Analytics. We use Google Analytics Demographics and Interest Reporting tools to provide a better understanding of who is visiting the website. All data that is tracked is anonymous.

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Other sites to which we provide links may be governed by different policies. We do not assume responsibility for the content or information practices of these other websites, and we strongly encourage you to review the privacy statements and policies of all externally-linked websites.

Use of Cookies

Cookies are small text files that are stored on the devices (computer/tablet/mobile) you use to access our website.

SLR uses cookies to improve the user experience and to provide us with information about how our website is used so that we can make sure it is up to date, relevant and error free.

The following types of cookies are used on this website:

• Persistent Cookies: These are the small text files that are created in the cookies folder of your web browser by the website. They can contain information to record specific browsing information such as how you reached the website, the pages you view, options you select, and the path you have taken through the site. These typically remain in your cookies folder.

List of cookies used by SLR's website:

Cookie Type	Cookie Name	Description
Persistent Cookie	location code	A cookie that stores data relating to your geographic location to ensure you are looking at the most relevant version of the website. It stores no other information.
Persistent Cookie	funnel	This is an analytical cookie which tracks the user journey across the website. This helps with user journey and improving the overall user experience of the website

Google Cookies

In addition to the above cookies, SLR uses the following Google cookies:

_ga,_gat,__utma,__utmt,__utmb,__utmc,__utmz,__utmv

Your consent and control

Using slrconsulting.com means you agree to the use of cookies in the manner described above. You can choose to restrict cookies set on slrconsulting.com through your browser settings at any time. Before cookies are placed on your device you will see a banner at the left of your screen requesting your consent to set those cookies. By giving your consent, you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent for any cookies other than



those which are strictly necessary; however certain features of our site may then not function as intended.

You will be given the opportunity to allow or deny different categories of cookie that we use. You can return to your cookie preferences to review this at any time. For more information about how to do this, and about cookies in general, you can visit <u>www.allaboutcookies.org</u>.

E-newsletters

In regions where we deliver our regular e-newsletters, we use a third-party provider, MailChimp or Vision6, to deliver these. We gather statistics around email opening and clicks to help us monitor and improve our e-newsletters. We do not assume responsibility for the content or information practices of these other websites, and we strongly encourage you to review the privacy statements and policies of all externally-linked websites

Marketing

We want to give you control over our use of your data for direct marketing purposes. This means you can opt-out of receiving emails from us at any time by unsubscribing using the link provided in our emails.

Links to other websites

This privacy notice does not cover the links within the company website linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

What is the legal basis for our collection of this information?

We have reviewed the purposes of our processing activities and selected the most appropriate lawful bases for what we do. These are:

- For the purposes of executing a contract between us
- Because it is in our legitimate interest to do so. (If this applies, we have confirmed that our interests are not overridden by yours, or by your fundamental rights or freedoms).
- To enable us to meet our legal obligations
- When you have given your consent for us to use the data, in which case you may withdraw such consent at any time.

Who we can share your information with?

We may share your information with other SLR Group companies. We may also share your information with other companies outside the SLR Group with whom we work in partnership (such as consultant or contractor partners on a specific project) and others which are not our partners, e.g. government authorities, sub-contractors or suppliers providing services on our behalf. We will obtain your agreement before data is shared with third-parties if the sharing with such organisations would not be expected from the nature of your interaction with us.



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Data Security

Personal data collected from you is held within a secure environment in compliance with the law, and follows the SLR Data Protection Procedures.

Information retention

We will keep your information for as long as you have a relationship with us. After it ends we will keep it where we can access it for our legitimate purposes – for example to help us respond to queries or complaints, or for other reasons (such as internal project experience and/or, reference projects if you have agreed to allow us to share the project details with other potential clients) and responding to requests from regulators. Please contact us if you want to know more about how long we are keeping your personal details.

Personal data collected from the website is retained in an active processing environment for marketing purposes for a period of three years.

Transferring your information overseas

Your information may be transferred and stored in countries outside the European Economic Area, including some that may not have laws that provide the same level of protection for personal information. When we do this, we will ensure that this is carried out in such a way that the level of protection given to Personal Data is at least as good as in the European Economic Area.

Your rights

You have a number of rights relating to your Personal Data (if you are a European Citizen this is a statutory right), for example:

- to be informed of our collection and use of personal data and to see what we hold about you;
- to access this data and re-use it;
- to ask us to share this data with another party;
- to correct this data if it is inaccurate or incomplete;
- to ask us to delete any Personal Data we hold about you;
- to object to or restrict the processing of your Personal Data and to select which purpose it is used for;
- to make a complaint.

Please contact our Data Protection Officer to request access to information we may hold about you by completing the Subject Access Form, <u>Subject Access Form</u> and returning to <u>DataProtection@slrconsulting.com</u>, who you should also contact if you have any further queries or need additional information.

You can read more about these rights on your country's independent information protection commission website:



- UK Information Commissioner's Office
- France Commission Nationale de l'Informatique et des Libertés
- Ireland Office of the Information Commissioner

Queries or complaints

SLR takes the security of personal data very seriously. Please let us know if you feel the collection or use of personal information is in any way unfair, misleading or inappropriate.

If you have any queries on the processes we use to collect or store data or have any suggestions on how we could improve our processes please do get in touch with our Data Protection Officer, <u>DataProtection@slrconsulting.com</u>

Similarly, if you want to make a complaint about the way we have processed your personal information, we would first ask that you contact us directly to discuss this and allow us to remedy the situation. You are also able to lodge a complaint with the Information Commissioner Office (ICO), the statutory body which oversees data protection law. Details of how to do this can be found on their website <u>www.ico.org.uk/concerns</u>.

Changes to this privacy notice

We keep our privacy notice under regular review and may periodically make changes to this notice. We recommend that you revisit this Privacy notice and our other policies on occasion to learn of any changes. This privacy notice was last updated in July 2020.

How to contact us

If you have any questions or concerns regarding this privacy policy, please direct them to <u>DataProtection@slrconsulting.com</u>

SLR Group Companies

The SLR Group companies covered by this Privacy Notice are:

SLR Global Ltd, registration number 11182524

SLR Consulting Ltd, registration number 3880506 (acts on behalf of all Group Companies not registered in Europe for the purposes of compliance with GDPR and the Data Protection Act).

SLR Environmental Consulting (Ireland) Ltd, registration number 253332

SLR Consulting France SAS, registration number 807392980