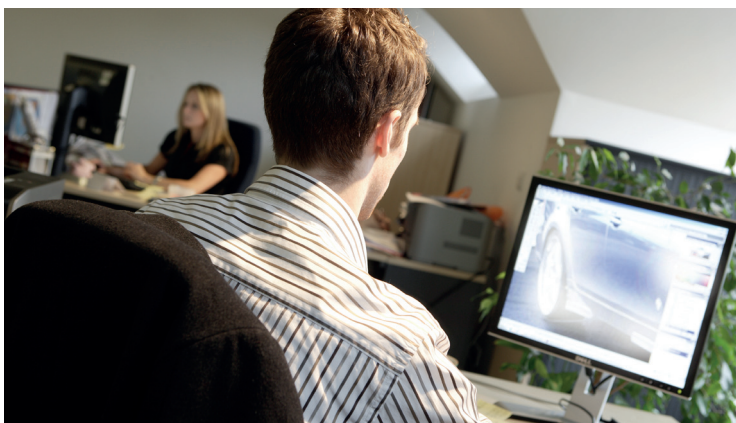


# DATA PROTECTION POLICY



## SAFEGUARDING YOUR DETAILS

### Background

In order to operate efficiently, Rydon has to collect and use personal information about people with whom it works. These people may include current, past and prospective employees; members of the public; clients, customers and suppliers. In addition, it may be required to collect personal information in order to comply with taxation, legal and other regulatory requirements.

In collecting and using such information, Rydon are committed to protecting the rights and privacy of individuals in accordance with the provision and principles of the Data Protection Act 1998.

Rydon understands the importance of respecting individuals' personal information and is committed to abiding by both the spirit and the letter of the Act.

The purpose of this policy is to enable Rydon to:

- comply with the law in respect of the data it holds about individuals;
- follow good practice;
- protect Rydon's supporters, staff and other individuals.

### Policy

Whenever collecting information about people, Rydon agrees to apply the following eight principles which reflect and address those contained in the Data Protection Act 1998.

1. Personal data will be processed fairly and lawfully;
2. Personal data will be obtained only for the purpose specified;
3. Data should be adequate, relevant and not excessive for the purposes required;
4. We will strive for all data collected and retained to be accurate and kept up-to-date;
5. Data will not be kept for longer than is necessary for purpose;
6. Data will be processed in accordance with the rights of data subjects under the Data Protection Act 1998;
7. All appropriate technical and organisational measures will be taken to avoid unauthorised or unlawful processing of personal data as well as against accidental loss or destruction or damage to personal data; and
8. Personal data will not be transferred outside the UK.

This policy applies to information relating to identifiable individuals, even where it is technically outside the scope of the Data Protection Act by virtue of not meeting the strict definition of 'data' in the Act.

#### Individual's rights to access personal data held about them

Where Rydon holds personal information about an individual, that individual has the right to access such information, to ensure that it is correct and fairly held. Should they believe this not to be the case they will be given every opportunity to rectify the issue. All requests to access such information will be handled in accordance with the Act and compliant guidance issued to Rydon's employees.

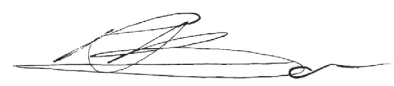
#### Register of data controllers

The Information Commissioner maintains a public register of individuals and organisations which hold and process personal data, known as data controllers. All Rydon Group Companies are registered as data controllers with the Information Commissioner. Each company has a person designated to be responsible for the annual registration renewal, and also notification of changes to the register.

### Governance

All policies within the company are approved by the Group Board which is chaired by the Chief Executive. Each policy is reviewed at least once annually to ensure that we respond to clients, business strategy, legislation and any standards or codes of practice determined by the market.

Signed: \_\_\_\_\_



**Robert Bond**  
Group Chief Executive

Dated: January 2012