

DATA PROTECTION POLICY

1 Introduction

- 1.1 This policy (the “**Data Protection Policy**”) applies to the operations of Bazalgette Tunnel Limited, its group companies and Jacobs (together “**Tideway**”). Anyone working for Tideway or otherwise on the Thames Tideway Tunnel Project (the “**Project**”) must comply with this Data Protection Policy when handling or otherwise processing Personal Data¹. In the course of its activities, Tideway will handle Personal Data relating to a range of individuals who may include, for example, members of the public, current, past and prospective employees, contractors and suppliers. Tideway may be required by law to collect and use information, including Personal Data, in order to comply with the requirements of central government.
- 1.2 This Personal Data must be handled lawfully and, in particular, in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (EU 2016/679) (“**GDPR**”) and any legislation which amends, re-enacts or replaces those laws in England and Wales (together the “**Data Protection Laws**”).
- 1.3 Tideway considers that the correct treatment of Personal Data is integral to its successful operations and to maintaining trust of the persons it deals with. Tideway fully appreciates the underlying principles of the GDPR and supports and adheres to its provisions.
- 1.4 This Data Protection Policy and the associated **Data Protection Procedure** have been developed to safeguard the interests of the Project, Tideway employees, contractors, sub-contractors, consultants, agents, third party suppliers, partners, main work contractors, framework providers and anyone working on the Project, regardless of employment route or parent company.
- 1.5 For more information on how Tideway processes your Personal Data, please refer to the **Workers Privacy Notice**.

2 Data protection principles

- 2.1 The GDPR requires that anyone processing Personal Data complies with six core principles. These provide that Personal Data must be:
 - a. Processed fairly, lawfully and in a transparent manner in relation to Data subjects.

¹ Where used in this policy, “**Personal Data**” means data relating to a living individual who can be identified from that data (or from that data and other information in our possession).

- b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- c. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d. Accurate and where necessary kept up to date.
- e. Not kept longer than necessary for the purpose for which they were collected.
- f. Kept secure, in a manner that is appropriate to the type of Personal Data processed.

While it is not a separate principle, the GDPR prohibits Personal Data from being transferred outside the European Economic Area (the “**EEA**”) to countries lacking adequate data protection laws.

3 Individuals' rights

- 3.1 Under the GDPR, all individuals have the right to:
- a. Obtain confirmation as to whether their Personal Data is processed and, where that is the case, access to that Personal Data along with the details of its processing.
 - b. Obtain rectification of their Personal Data where the data is inaccurate.
 - c. Obtain from Tideway the restriction of processing of their Personal Data in certain circumstances.
 - d. Request that, in certain circumstances, their Personal Data is deleted.
 - e. Object to the processing of their Personal Data for automated decision making and profiling purposes.
 - f. Obtain a copy of their Personal Data in a structured, commonly used and machine-readable format.
 - g. Not have their Personal Data processed for direct marketing purposes.
 - h. Ask Tideway not to process Personal Data where it causes substantial unwarranted damage to them or anyone else.
 - i. Claim compensation from Tideway for damage and distress caused by any breach of the GDPR.

4 Tideway commitment

- 4.1 Tideway has procedures in place to ensure that:
- a. Everyone managing and handling Personal Data understands that they are responsible for complying with our Data Protection Procedure.
 - b. There is someone with overall responsibility for data protection in the organization.
 - c. Staff who handle Personal Data receive training in relation to data protection matters and are appropriately supervised.

- d. Queries received from individuals about the handling of Personal Data are dealt with promptly and, where applicable, in compliance with the Data Protection Laws.
- e. Employees know how to access their own Personal Data.
- f. Methods of handling Personal Data are regularly assessed and evaluated.
- g. Any disclosure of Personal Data takes place in compliance with our Data Protection Procedure.
- h. Tideway cooperates with requests received from supervisory authorities with competence to supervise and enforce compliance with the Data Protection Laws.
- i. Tideway maintains appropriate technical and organizational measures to ensure that Personal Data is kept secure at all times against unauthorised or unlawful loss or disclosure, and that any breach of security that leads to Personal Data being compromised is handled in compliance with the Data Protection Laws. The steps that Tideway will take in the event of a breach of Personal Data are set out in our **Data Breach Management Process**.
- j. All third parties who receive Personal Data from Tideway (e.g. outsourced Payroll and HR administration providers), whether in the capacity of controller or processor, will be required to enter into contractual arrangements as required by the Data Protection Laws, including in relation to any transfers of Personal Data to third countries outside of the EEA.

Details on how this policy will be implemented can be located in our Data Protection Procedure (2260-TDWAY-TTTUN-990-ZZ-PP-700013).



Andy Mitchell

Chief Executive Officer

14-Feb-2020