

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 accordance with the UK General Data Protection Regulation, the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025 (“**UK 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.

2.2 Tideway demonstrates accountability through documented governance arrangements, procedures, training and audit.

3 Individuals' rights

- 3.1 Under the GDPR, 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 processing and to decisions based solely on automated decision processing where such decisions have legal or similarly significant effects, subject to applicable safeguards.
 - 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.
- 3.2 Tideway maintains procedures to respond to rights request and complaints within statutory guidelines.

4 Lawful Bases for Processing

- 4.1 Personal Data shall be processed only where a lawful basis applies, including contractual necessity, legal obligation, legitimate interests (including recognised legitimate interests introduced by the Data (Use and Access) Act 2025), consent where required, and tasks carried out in the public interest.

5 International Transfers

- 5.1 Transfers of Personal Data outside the United Kingdom (restricted transfers) are permitted only where appropriate safeguards are in place, including UK adequacy regulations, the International Data Transfer Agreement (IDTA) or other mechanisms permitted under UK GDPR.
- 5.2 Transfers between the UK and EEA states are permitted on the basis of mutual adequacy decisions, subject to ongoing review.

6 Security and Personal Data Breaches

- 6.1 Tideway implements appropriate technical and organisational measures to ensure the security of Personal Data.
- 6.2 Any Personal Data breach that may result in a risk to individuals shall be assessed and managed in accordance with the **Data Breach Management Process**, including notification to the ICO and affected individuals where required.

7 Third Parties Processors

- 7.1 All third parties that process Personal Data on behalf of Tideway must do so under written agreements compliant with the Data Protection Laws and must implement appropriate security measures.

8 Governance, Training and Review

- 8.1 Tideway designates senior accountability for data protection compliance.
- 8.2 Staff who handle Personal Data receive appropriate training and guidance.
- 8.3 This policy shall be reviewed at least annually or earlier where required due to legal or operational change.

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



Matthew Parr
Chief Executive Officer
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