

Data Privacy Policy Statement

This is the privacy policy for the RED group of companies which consists of the companies listed at the end of this privacy policy under the heading “The RED Group”. In this privacy policy “RED”, “we”, “us” and “our” refers to the RED Group of companies.

RED Engineering Design Limited is the data controller of your personal information and will make the decision as to how and why your information is used. RED Engineering Design Limited is registered with the UK Information Commissioner’s Office

Get in touch:

- Email: DPM@red-eng.com
- Phone: 01869 355 600
- Post: 1 Lower Farm Barns, Bainton Road, Bucknell, Bicester, OX27 7LT

RED is committed to protecting your privacy, and takes its responsibilities regarding the security of business contact information very seriously. This policy explains how RED uses any personal information that we collect about you, the procedures that RED has in place to safeguard your privacy and your rights in relation to your personal information.

RED seeks to provide innovative services and engineering design within the building services sector. To enable us to achieve this, we hold information about our business contacts, the services they have consulted us on or they have expressed interest in. This information is used to facilitate the delivery of projects or provision of services including to obtain feedback on our activities to help us improve the services we provide.

Our business is constantly developing and improving, to reflect that and any changes in law and regulation we may need to make changes to this privacy policy from time to time; the date at the bottom of this page indicates when we last updated this privacy policy. We will provide notice either through our website or other means when we make changes to this privacy policy.

1. Collecting and using your information

- 1.1. We collect the following information about you and use it in the following ways:
 - 1.1.1. If you enter into a contract with us to provide you with services you will need to provide us with your (or your employees and officers) name and contact details, including email address, postal address and phone number. We will use this information to provide services to you or to comply with a legal duty.
 - 1.1.2. If you contact us to request information about us or our services or to make a complaint you will need to provide us with your name and contact details (including email address, postal address and phone number). We will use this information to answer your enquiry, send you the requested information or literature or to respond to your complaint.
 - 1.1.3. If you fill in a form on our website you will need to provide us with the information requested in the form marked as “required”, “mandatory” or

similar. We will use the information for the purposes described on the relevant form.

1.1.4. If we collaborate with you on a project to provide services to a client we will collect information about you (or your employees and officers), including name and contact details, for the purposes of that collaboration and providing such services.

1.2. If you choose to submit personal information to us we will process that information in accordance with this privacy policy. Please only provide us with information that you are happy for us to process in accordance with this privacy policy (see the section below headed “Accessing your information and other enquiries” if you change your mind at any time and would like that information deleted from our systems).

2. Sharing with third parties

We may occasionally share your personal information within the RED Group of companies. Each member of the RED Group of companies complies with our Binding Corporate Rules. Our Binding Corporate Rules have been approved by the European Data Protection Authorities and are in place to ensure that each member of the RED Group of companies (wherever they are located in the world) treats the privacy and security of personal data shared with them by other members of the RED Group of companies in line with the requirements of the European Union.

2.1. We will not share your information with any unrelated third parties except:

2.1.1. where we have your permission;

2.1.2. where required in order to perform the obligations on us under any contract we enter into with you;

2.1.3. to our professional advisers for the purposes of obtaining professional advice or establishing, exercising or defending legal rights;

2.1.4. to our suppliers (for instance suppliers that provide us with IT services);

2.1.5. where any other entity is looking to buy our business or part of our business (we will always ensure that any prospective purchaser of our business processes personal information in accordance with this privacy policy); or

2.1.6. where we are required by law and to law enforcement agencies, government entities, tax authorities or regulatory bodies.

2.2. We will not share your information with third parties for marketing or market research without your explicit consent.

3. Promotional and marketing information

3.1. We like to keep clients and other businesses updated on the services that we provide and any news about our business. If we send you such information it is because we think these communications may be of interest or relevance to you. You can opt-out at any time by contacting us via any of the methods set out below.

3.2. If you change your mind about how you would like to receive such information or you no longer wish to receive this information, you can tell us at any time:

3.2.1. by contacting us (by email to DPM@red-eng.com with the word “unsubscribe” in the subject line or by phone on 01869 355 600);

- 3.2.2. by posting a letter to us including your full name, email address and the word “unsubscribe”; or
 - 3.2.3. by clicking the “unsubscribe” link in the marketing emails you receive from us.
- You can also contact us using these details if you wish to complain about a marketing communication you have received in error.

4. Accessing your information and other enquiries

- 4.1. If you:
 - 4.1.1. would like to find out what information we hold about you;
 - 4.1.2. believe that any of the information that we hold about you is incomplete, inaccurate or out of date;
 - 4.1.3. have any queries about how we use your information which you do not think are answered in this privacy policy; or
 - 4.1.4. would like us to delete your information from our systems;please contact us by using the contact details set out at the top of this page.
- 4.2. We will always try to respond to your request to your satisfaction however there may be situations where we are unable to do so (for example if we are required by law to keep your information).
- 4.3. If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you should contact the UK Information Commissioner's Office, which oversees data protection compliance in the UK. Details of how to do this can be found at www.ico.org.uk.

5. Keeping your information safe

- 5.1. We employ a variety of physical, technical and organisational measures to keep your information safe and to prevent unauthorised access to, or use or disclosure of it. Electronic data and databases are stored on secure computer systems and we control who has access to them (using both physical and electronic means including firewalls and password protection). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling your information.
- 5.2. We align our technology security measures to ISO27001 principles.
- 5.3. We cannot absolutely guarantee the security of the internet or external networks or your own device, accordingly any online communications (e.g. information provided by email or through our website) are at your own risk.

6. How long will we keep your information?

- 6.1. We will keep your information for as long as it is required for the purpose(s) we collected it for (or for a related compatible purpose); for legal reasons this will in line with our Data Retention Policy.
- 6.2. We regularly review what data we have and delete that which is no longer necessary.

7. Where will we keep your information?

- 7.1. We will usually keep your information within the European Union (EU). If we or one of our subcontractors (such as our IT service providers) need to transfer it outside of the EU then

we will take steps to make sure adequate levels of privacy protection, in line with UK data protection law, are in place. These safeguards will usually be contractual and/or the result of a European Union decision which allows the transfer of your information (for example, a US organisation which is certified under the EU-US Privacy Shield framework).

- 7.2. We use the email services platforms listed in the table below to manage and send certain of our email communications. These platforms are based in the US (if you receive emails powered by either of these platforms, this will mean your information has been transferred to the US) and are certified under the EU-US Privacy Shield scheme meaning they have taken steps to ensure your information is adequately protected. You can learn more about the way these platforms handle personal information by reading their respective privacy policy (we have included a link to them in the table below). If you would like to learn more about the Privacy Shield scheme please visit <https://privacysshield.gov/welcome>.

Email Marketing Service Provider	Privacy Policy
MailChimp (Rocket Science Group LLC)	https://mailchimp.com/legal/privacy/
SurveyMonkey (SurveyMonkey Inc)	https://surveymonkey.co.uk/mp/policy/privacy-policy/

8. Cookies

- 8.1. Our website may use “cookies” to provide essential functionality.
- 8.2. A cookie is a text file placed on your computer, to collect standard internet log information and visitor behaviour information in an anonymous form. Cookies do not damage your computer. Cookies by themselves cannot be used to discover the identity of the user.
- 8.3. You have the ability to accept or decline cookies by modifying the settings on your web browser. If you use different web browsers or different devices to access our website you will need to change the settings on each of your web browsers and devices.
- 8.4. If you disable some or all cookies you may not be able to access parts of our website and/or you may reduce the features and functionality of our website.

9. Google Analytics

- 9.1. Our website uses Google Analytics to help analyse how users use it. Google Analytics uses 'cookies' to collect this information (including your journey to, from and within our website). The information generated by the cookie about your use of our website (including your IP address) is transmitted to Google. This information is then used to evaluate visitor use of the website and to compile statistical reports on website activity and broad demographic information (such as how many of the visitors to our website access it from outside the UK).
- 9.2. We will not (and will not allow any third party) to use this statistical analytics tool to track or to collect any personally identifiable information of visitors to our website. We will not associate any data gathered from our website with any personally identifiable information from any source as part of our use of the statistical analytics tools. Google will not associate your IP address with any other data they hold. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user.

10. Third party websites

Our website may contain links to third party websites. The privacy policy for those websites will be different to our privacy policy and you should read the applicable privacy policy before submitting information to any such third party.

11. The RED Group

The RED group of companies is part of the Engie and Tractebel group of companies and includes the following entities:

RED Engineering Design Limited

Registered in England and Wales

Company number: 05299489

Registered office address: 2 Church Street, Burnham, Buckinghamshire SL1 7HZ

RED Group Holdings Limited

Registered in England and Wales

Company number: 10211704

Registered office address: 2 Church Street, Burnham, Buckinghamshire SL1 7HZ

RED Managed Services Limited

Registered in England and Wales

Company number: 07270625

Registered office address: 2 Church Street, Burnham, Buckinghamshire SL1 7HZ

RED Engineering Design

Registered Liaison Office in Turkey

Licence number: 7340795548

Registered office address: Ali Sami Yen Sokak, Orman Blok, No 3-A, Ofis 18, Gayrettepe 34394, Istanbul, Turkey

RED Engineering Asia Pacific Pte Ltd

Registered in Singapore

Company number: 201228353W

Registered office address: 143 Cecil Street, #08-01 GB Building, Singapore 609542

RED Engineering Asia Inc

Registered in Philippines

Company number: CS201018905

Registered office address: 26th Floor, GT Tower International, 613 Ayala Avenue, Makati City, Manila, Philippines