

# Privacy Policy for Highgrove Chartered Surveyors

Last Updated: 20 May 2025

## 1. Introduction

Welcome to Highgrove Chartered Surveyors ("we," "us," or "our"). We are a construction consultancy firm operating in the United Kingdom. We are committed to protecting and respecting your privacy.

This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website [www.highgroveqs.co.uk](http://www.highgroveqs.co.uk), including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the "Site"). Please read this privacy policy carefully. If you do not agree with the terms of this privacy policy, please do not access the site.

We are a data controller registered with the Information Commissioner's Office (ICO) under registration number: ZB901613. Our contact details are provided at the end of this policy.

## 2. What Information Do We Collect?

We may collect and process the following types of personal data:

- **Identity Data:** Includes first name, last name, username or similar identifier, marital status, title, date of birth, and gender.
- **Contact Data:** Includes billing address, delivery address, email address, and telephone numbers.
- **Financial Data:** Includes bank account and payment card details (typically processed by third-party payment processors).
- **Transaction Data:** Includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data:** Includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Site.
- **Profile Data:** Includes your username and password (if you create an account), purchases or orders made by you, your interests, preferences, feedback, and survey responses.



- **Usage Data:** Includes information about how you use our website, products, and services.
- **Marketing and Communications Data:** Includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Client and Project Data:** In the course of providing our consultancy services, we may collect information relating to your construction projects, which might include personal data of individuals involved in those projects (e.g., site contacts, contractor details). This data will be handled with the utmost care and in accordance with data protection laws and our contractual obligations.
- **Candidate Data:** If you apply for a position with us, we will collect information provided in your application, CV, and during the recruitment process.

We may also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

We do not routinely collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data) unless it is directly relevant to our services (e.g., accessibility requirements for a project) and provided with your explicit consent or as otherwise permitted by law.



### 3. How Do We Collect Your Information?

We use different methods to collect data from and about you including through:

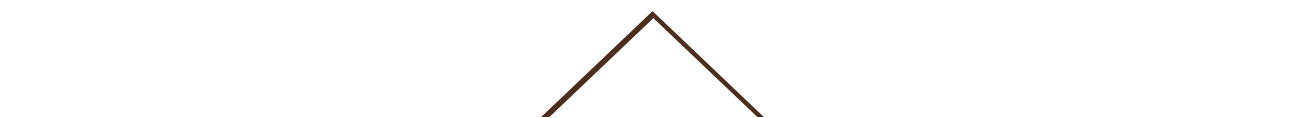
- **Direct interactions:** You may give us your Identity, Contact, Financial, Client and Project, and Candidate Data by filling in forms on our Site, or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:
  - Enquire about or apply for our services;
  - Create an account on our Site;
  - Subscribe to our service or publications;
  - Request marketing to be sent to you;
  - Enter a competition, promotion, or survey;
  - Give us feedback or contact us;
  - Apply for a job with us.
- **Automated technologies or interactions:** As you interact with our Site, we may automatically collect Technical Data about your equipment, Browse actions, and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. Please see our Cookie Policy for further details.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers such as Google;
  - Contact, Financial, and Transaction Data from providers of technical, payment, and delivery services;
  - Identity and Contact Data from data brokers or aggregators;
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.
  - Information related to construction projects from clients, contractors, or other project stakeholders.



## 4. How Do We Use Your Information?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **To Perform a Contract:** Where we need to perform the contract we are about to enter into or have entered into with you (e.g., to provide construction consultancy services).
- **Legitimate Interests:** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. This includes:
  - Providing and managing your access to our Site and services.
  - Responding to your enquiries and providing customer support.
  - Improving our website, services, and client relationships.
  - Managing our business operations, including internal record keeping.
  - Conducting data analytics to understand service usage and improve our offerings.
  - Ensuring the security of our Site and systems.
  - Sending you information about services we believe may be of interest to you (where permitted by law or with your consent).
- **Consent:** Where you have given us explicit consent to do so (e.g., for sending direct marketing communications via email or text message if you are not an existing customer or for processing certain types of sensitive data). You have the right to withdraw consent at any time by contacting us.
- **Legal Obligation:** Where we need to comply with a legal or regulatory obligation (e.g., for fraud prevention or compliance with tax laws).



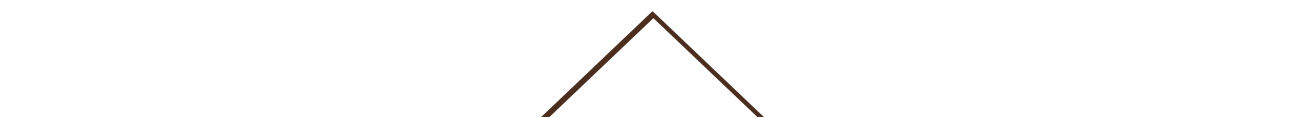
Specifically, we may use your information for the following purposes:

- To provide and deliver our construction consultancy services.
- To manage our contractual relationship with you or your organisation.
- To process payments and manage accounts.
- To communicate with you about projects, services, and administrative matters.
- To personalise your experience on our Site.
- To send you marketing communications that you have opted into or which are otherwise lawful.
- To improve the Site, our services, marketing, customer relationships, and experiences.
- To ensure the security of our Site and prevent fraud.
- To comply with legal and regulatory requirements, including health and safety obligations on construction sites.
- For recruitment purposes.

## 5. Lawful Basis for Processing

We have set out above the main ways we use your data. Under UK data protection law, we must have a "lawful basis" for processing your personal data. The lawful bases we rely on are:

- **Consent:** You have given clear consent for us to process your personal data for a specific purpose.
- **Contract:** The processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** The processing is necessary for us to comply with the law (not including contractual obligations).
- **Legitimate interests:** The processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests.

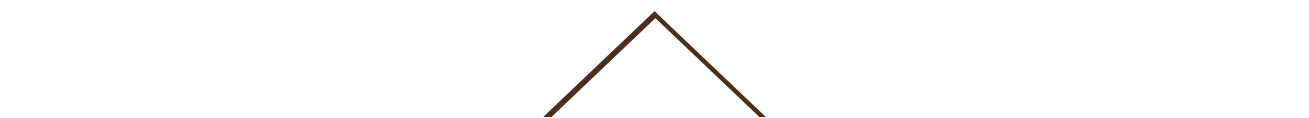


## 6. Disclosure of Your Information

We may share your personal data with the parties set out below for the purposes set out in section 4:

- **Service Providers:** Third-party vendors, contractors, and agents who perform services for us or on our behalf and require access to such information to do that work (e.g., IT support, payment processors, cloud hosting services, marketing agencies, professional advisors like lawyers, bankers, auditors, and insurers).
- **Project Partners:** Where necessary for the provision of our consultancy services, we may share information with other parties involved in a construction project, such as clients, architects, engineers, contractors, and sub-contractors. We will only do so where there is a lawful basis and appropriate safeguards are in place.
- **Business Transfers:** If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party.
- **Legal Requirements:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process.
- **To Protect Rights and Property:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **With Your Consent:** We may disclose your personal information for any other purpose with your consent.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.



## 7. International Data Transfers

Some of our external third parties may be based outside the UK or European Economic Area (EEA), so their processing of your personal data will involve a transfer of data outside the UK/EEA.

Whenever we transfer your personal data out of the UK/EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK authorities.
- Where we use certain service providers, we may use specific contracts approved by the UK authorities which give personal data the same protection it has in the UK (such as the International Data Transfer Agreement (IDTA) or Addendum to EU Standard Contractual Clauses).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK/EEA.

## 8. Data Security

We have put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. These measures include:

- Secure servers and networks.
- Encryption of data where appropriate.
- Access controls to limit access to personal data to those employees, agents, contractors, and other third parties who have a business need to know.
- Regular security assessments and updates.
- Staff training on data protection.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



## 9. Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

For example, by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. Data related to construction projects may need to be retained for longer periods in line with industry practice and contractual or legal obligations (e.g., related to defects liability periods or statutory limitation periods).

In some circumstances you can ask us to delete your data: see "Your Legal Rights" below for further information.

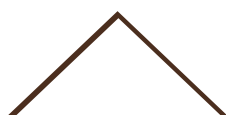
In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.



## 10. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.



- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us using the details in Section 15.

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



## 11. Cookies and Tracking Technologies

Our Site uses cookies and similar tracking technologies to distinguish you from other users of our Site, to provide certain functionalities, and to improve our Site. For detailed information on the cookies we use and the purposes for which we use them, please see our Cookie Policy.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Site may become inaccessible or not function properly.

## 12. Links to Other Websites

Our Site may contain links to other websites of interest. However, once you have used these links to leave our Site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## 13. Children's Privacy

Our Site and services are not intended for children under the age of 13 (or any higher age of consent applicable in your jurisdiction), and we do not knowingly collect personal data from children under this age. If we become aware that we have collected personal data from a child under this age without verification of parental consent, we will take steps to delete that information. If you believe we might have any information from or about a child under this age, please contact us.

## 14. Changes to This Privacy Policy

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Last Updated" date and the updated version will be effective as soon as it is accessible. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.



## 15. Contact Us

If you have any questions about this privacy policy or our privacy practices, or if you wish to exercise any of your legal rights, please contact us in the following ways:

- **Full name of legal entity:** Highgrove Surveyors Ltd (16435012)
- **Email address:** [info@highgroveqs.co.uk](mailto:info@highgroveqs.co.uk)
- **Postal address:** 3 Highgrove Point, London NW3 6PZ
- **Telephone number:** +44 (0) 7800 800 652

If you have a complaint about how we have handled your personal data, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

