

BURO HAPPOLD LIMITED – PRIVACY POLICY

Effective Date: 30 October 2020

Introduction

Buro Happold Limited is a global engineering consultancy offering building visualisation and asset use analytics services (the "Products"). Buro Happold Limited ("Buro Happold", "we", "us" and "our") respects your right to privacy and understands that privacy is important to users of our software products and services (our "Products").

This Privacy Policy informs you of our policies and procedures regarding the use and disclosure of your personal information when using our Products. It also explains your rights and the choices available to you regarding our use of your data and how you can access and update this information.

This Privacy Policy explains what Personal Data (as defined below) we collect from you via the Microsoft Azure website. Any Product purchases made by you do not require you to use our company website www.burohappold.com in order to access the Products. As a result you will not be required to input any personal data into, or be subjected to any automated collection via our website www.burohappold.com. For detail of any technical data collected by automated technologies or interactions with the Microsoft Azure website please click **here**, for their privacy policy and information on the use of cookies.

We keep our Privacy Policy under regular review. We encourage you to review our Privacy Policy to stay informed about our information practices and the ways in which you can help protect your privacy.

1. The Personal Data We Collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) ("Personal Data").

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username and job title.
- **Contact Data** includes billing address, email address and telephone number.
- **Financial Data** includes invoicing information that you provide on behalf of your organisation. For the avoidance of doubt, no personal financial data will be collected from you.
- **Transaction Data** includes details about payments to and from your organisation and other details of products and services purchased from us.

- **Technical Data** the Microsoft Azure platform will collect and retain your internet protocol (IP) address, your login data, browser type and version, time zone setting and location.
- **Profile & Usage Data** includes your username and password and how you use the Microsoft Azure website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We will not engage in the collection, use and sharing of **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity.

We do not collect any **Special Categories of Personal Data** (e.g. 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).

2. **Data Processor**

When you purchase Products from us we will only collect limited personal identity data to enable us to provide the services. Buro Happold will act as data processor for the purposes of supplying the Products to you.

3. **How is your personal data collected?**

- **Direct interactions.** You may input your name, email address, job title and number when you create an account on Microsoft Azure website. When you contact us direct to order Products we will collect details on your purchases and invoicing details.
- **Third parties or publicly available sources.** We will not receive personal data or technical data about you from third parties (such as Google or other analytics providers) or public sources.

4. **How Do We Use, Process and Retain Your Personal Data?**

4.1 We will only use your Personal Data in the following circumstances:

- Where we need to perform and administer the Product contract we have entered into with you, or fulfil any other requests you may make.
- 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. For example we may use your Personal Data to help us improve our Products or update you on additional related services.
- Where we need to comply with a legal obligation.

4.2 We collect and process Personal Data in a transparent manner, to the extent necessary for specified, explicit and legitimate purposes, and do not process it further in a manner incompatible with those purposes. We take care that the data we collect is accurate and, when necessary, updated. We take all reasonable steps to immediately delete or rectify Personal Data, if inaccurate. We take the appropriate technical and organisational measures for the

security, confidentiality, integrity and availability of the data. We expressly declare that these measures ensure that, by definition, Personal Data is not made accessible without the intervention of the natural person to an indeterminate number of natural persons.

- 4.3 Our Customer data is retained for as long as the Customer's subscription to the Product lasts. Upon completion of the subscription term the data will be deleted or returned to the Customer if the Customer instructs us to.

5. Information Sharing and Disclosure

- 5.1 **Users:** We will display your Personal Data in your Microsoft Azure profile page and elsewhere when using our Products according to the preferences you set in your account. You can review and revise your profile information at any time. You should be aware that the administrator, as well as specially designated support personnel in order to provide support for technical issues you may face, may be able to: access information in and about your account; access communications history, including file attachments, for your account; disclose, restrict, or access information that you have provided or that is made available to you when using your account; and control how your account may be accessed or deleted.
- 5.2 **Third Parties:** We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.
- 5.3 **Service Providers, Business Partners and Others:** We use third party vendors and providers who supply the necessary hardware, networking and storage to run the Products. These third parties have access to your Personal Data only for purposes of performing these tasks on our behalf.
- 5.4 **Compliance with Laws and Law Enforcement:** We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process, to protect the property and rights of Buro Happold or a third party, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable.

6. Your Rights

- 6.1 **Transparency, information and answers to requests:** We adhere to the principle of transparency in processing. For any question regarding this Policy you may contact us at the email provided at the end of this Privacy Policy.
- 6.2 **Access:** You have the right to receive from us confirmation on whether your Personal Data is processed and in case this happens all required information thereof (processing means, records etc.).
- 6.3 **Rectification:** You have the right to require the rectification of inaccurate data relating to you without undue delay, as well as to fill in incomplete data if necessary, for processing.

- 6.4 **Erasure:** You have the right to ask for the erasure of Personal Data concerning you without undue delay. We will erase the data where one of the following grounds applies: a) the Personal Data is no longer necessary in relation to the purposes of processing; or b) the person requesting the erasure withdraws consent on which the processing is based and there is no other legal ground for the processing; or c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing or the data subject objects to processing for direct marketing; or d) the Personal Data has to be erased for compliance with a legal obligation. We will not proceed to the erasure of the Personal Data if the data must be maintained for compliance with a legal obligation or in cases where the processing is required for the establishment, exercise or defence of legal claims. If you receive marketing emails, you can remove yourself from the recipients list by selecting the "unsubscribe" link within the e-mail.
- 6.5 **Restriction of processing:** You have the right to request restriction of processing if the accuracy of Personal Data is disputed, for that period of time that allows us to verify the accuracy of Personal Data, or based on any other legitimate reason specified in applicable Data Protection Laws.
- 6.6 **Right to Object:** You may oppose the processing of Personal Data which takes place without your consent. In this case, we will no longer submit the Personal Data unless it demonstrates imperative and legitimate reasons for the processing that outweigh the interests, rights and freedoms of you as a data subject or for the foundation, exercise or support of legal claims. If you receive promotional emails, you can remove yourself from the recipients list by selecting the "unsubscribe" link within the e-mail content. You may also oppose processing at any time by contacting us at the email provided at the end of this Policy.
- 6.7 **Complaint to Supervisory Authority:** You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (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.

7. Security

We are committed to safeguarding your Personal Data. We are registered with the Information Commissioner's Office in the UK (reg no. Z355265X) and as such we align to data protection through appropriate technical and organisational measures designed to protect your information from unauthorised access.

8. Contacting Us

If you have any questions about this Privacy Policy or our privacy practices, please contact our Data Protection Officer in the following ways:

Delia Conway, Buro Happold Limited, Camden Mill, Lower Bristol Road, Bath, Somerset, BA2 3DQ. Email address: delia.conway@burohappold.com