The provision of traffic management solutions whilst works on the highway are carried out is a part of the daily activities carried out by the Breedon Group (**we/us**). We provide temporary traffic controls in the form of temporary traffic lights or stop/go signs at adhoc locations in the UK and Ireland where works are being carried out (**Traffic Controls**). As part of providing the Traffic Controls we need to protect and manage the health and safety and welfare of persons and property at Traffic Controls by using temporary CCTV cameras installed at Traffic Controls. The CCTV cameras may capture personal data of a member of the public (**MP**) who is at or travelling through Traffic Controls in a vehicle (**Surveillance**).

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) and the UK GDPR as defined in section 3(10) of the Data Protection Act 2018the EU Regulation 2016/679 General Data Protection Regulation (**GDPR**), including any data you may provide to us when you are at or travelling through a Traffic Control and under Surveillance.

The Company is a data controller for the purposes of the GDPR and every MP using Traffic Controls acknowledges the use and processing of personal data described in this privacy notice.

Company means the member of the Breedon Group. **Breedon Group** means any of companies within the Breedon group of companies, including, without limitation, Breedon Trading Limited, Breedon Cement Limited, Breedon Holdings Limited, Breedon Materials Limited, Breedon Surfacing Solutions Ireland Limited, Whitemountain Quarries Ltd, Alba Traffic Management Limited, Alpha Resource Management Ltd, Breedon Cement Ireland Limited, Lagan Cement Products Limited, Breedon Brick Limited, Minster Surfacing Limited, Robinson Quarry Masters Limited, Thomas Bow Limited and/or Welsh Slate Limited further details of which can be found at www.breedongroup.com.

2. The data we collect about you

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

- **Identity Data** includes video footage, at or travelling through a Traffic Control, of an individual and gender.
- **Audio Data** includes recording of your voice when they are at or travelling through a Traffic Control**.**
- **Vehicle Data** includes vehicle registration numbers and associated contact details when you are at or travelling through a Traffic Control.

3. How is your personal data collected?

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

- **Direct interactions.** We will collect Audio and Vehicle Data when you use a Traffic Control.
- **Third parties or publicly available sources.** We may receive Identity, Audio and Vehicle Data from publicly available sources such as Companies House and the Electoral Register based inside the UK and Ireland.

4. How we use your personal data

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:

- Where we need to provide Traffic Controls to a third party customer.
- 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.
- Where we need to comply with a legal or regulatory obligation.

- Where we need to respond to your feedback.

See below to find out more about the types of lawful basis that we will rely on to process your personal data.

We do not rely on consent as a legal basis for processing your personal data.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To review and monitor your conduct when using a Traffic Control	(a) Identity (b) Audio (c) Vehicle	(a) Necessary for our legitimate interests (b) Where we need to comply with a legal or regulatory obligation
To protect the health and safety of any of the operatives or any of our property at or between Traffic Control(s)	(a) Identity (b) Audio (c) Vehicle	(a) Necessary for our legitimate interests (b) Where we need to comply with a legal or regulatory obligation
To manage our relationship with you which will include dealing with any allegations of damage to person or property at a Traffic Control	(a) Identity (b) Audio (c) Vehicle	(a) Necessary for our legitimate interests (b) Where we need to comply with a legal or regulatory obligation

5. Who we share Personal Data with

We disclose personal data to a number of recipients which includes the following categories of persons:

- Other companies within the Breedon Group;
- Auditors and professional advisors, such as our bankers, insurance brokers or providers, lawyers and consultants;
- Law enforcement officials and statutory or regulatory authorities.

We may use and replace any third party which we wish to use to assist us in meeting its obligations under the contract, and where such third party is a processor of personal data, this constitutes prior general written authorisation as envisaged by Article 28(2) of the GDPR.

We may transfer personal data outside the EEA in accordance with the principles of the GDPR.

6. Compliance with Data Protection Principles

We will comply with data protection law which includes the GDPR (**Data Protection Laws**) applicable in the country in which the Company operates. This says that the personal information we hold must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that have been clearly explained and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

Personal Data Retention Periods

Except as otherwise permitted or required by applicable law or regulation, we only retain personal data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

Technical and Organisational Security Measures

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

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to personal information.
- **Request correction** of the personal information that we hold.
- **Request erasure** of personal information.
- **Object to processing** of personal information where we are relying on a legitimate interest (or those of a third party) and there is something about the particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of personal information.
- **Request the transfer** of personal information to another party.
- **Raise a complaint** about the processing of personal information.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Breedon Group.

Changes to this Privacy Notice

We reserve the right to amend this Privacy Notice from time to time consistent with the GDPR and other applicable data protection requirements.

Make a complaint

You may make a complaint to the local data commissioner's office in which the Company operates if you are dissatisfied as to how your personal data is being processed. In the first instance you can also make a complaint to the Company by emailing *legal.compliance@breedongroup.com*